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Comments: August 30, 2022 To: Secretary of Agriculture Thomas Vilsack and Secretary of the Interior Deb Haaland Re: Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies (E.O. 14072) Dear Secretary Vilsack and Secretary Haaland: I am writing on behalf of the Kalmiopsis Audubon Society. Our group has more than 400 members in Southwestern Oregon who are concerned about habitat for birds, fish, and wildlife, stewardship of public lands, and a positive future for coming generations. Our group has been engaged in conservation of some of our rare remaining old growth forests and so we know first-hand the importance of these ecosystems in our region[mdash]on so many levels! We are grateful that you are considering policies to advance President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies (E.O. 14072) and to help safeguard these important natural assets. In the big picture, protecting the remaining mature and old-growth forests is one of the most cost-effective and simple strategies the U.S. can deploy at scale. Although an enormous amount of this forest was cutover, the remaining old growth forests of the Pacific Northwest are some of the most important in the world for carbon storage and sequestration. Our largest, oldest trees have been absorbing and storing carbon for centuries, and conserving this massive carbon storage bank -which continues to grow[mdash]is hugely important to slowing the impacts of climate change. These forests collectively contain the bulk of the carbon already stored in federal forests and they continue to sequester carbon at high rates. Old-growth forests also have the largest and most fire-resistant trees. It's a wonder to walk through the forest and notice that most all of the largest trees have burn scars[mdash]evidence of the long history of fire and of resilience of these trees! As you know, communities throughout our region are now regularly threatened by climate-driven wildfires. By protecting our oldest, biggest trees that are most resistant to wildfire, your policies can also help to ensure community safety. In addition, our old growth forests serve as critical habitat for many threatened and endangered species, from the iconic spotted owl to the small marbled murrelet, to the coastal coho salmon. The forests also anchor steep slopes and act as a sponge to hold and filter rain water, allowing for gradual release through the year and assuring high water quality. The wood from big old trees becomes habitat that supports the base of riverine food webs and also forms structure in streams (cool pools and cover) that our iconic salmon and steelhead need for rearing habitat. These are important values to our region's ecology and economy. Although Executive Order 14072 enumerated many threats that climate change-induced drought, and related stresses pose to mature and old-growth forests, it neglected to include logging as a continuing threat to older federal forests and trees. Despite the many important recognized values of these forests, logging projects continue to target mature and old-growth trees on federal lands in our region. If logging these big old trees is allowed to continue, we are concerned that the vital role they play in the fight against climate change and in providing for fire resilience and habitat, will be lost, and so it's crucially important for you to develop policies that will help to prevent such losses. In particular, it's important that your policy use 80 years of age as the benchmark to define mature trees. Although many forests in the Pacific Northwest are fire prone, several studies over the past decade have found that older forests are more fire resilient than younger, second growth forests. Using an 80-year definition framework would capture the most fire-resistant trees and help to conserve the most carbon-storing forests. Protecting trees at 80 years would also help to protect biodiversity values and ensure the restoration of mature and old-growth forest ecosystems in the Pacific Northwest. Trees that are 80 years old are either already providing for habitat or are well on the way to developing traits, such as large limbs and cavities, needed by wildlife. Such an approach will also better ensure that there is enough redundancy in the definition of mature and old-forest to allow for natural disturbances and subsequent losses over time under climate change. In conclusion, we urge the Departments of Agriculture and Interior to work together to create durable policies based on a definition of mature forests and trees of 80 years to permanently end the avoidable loss of their critically important carbon, water, and wildlife values to logging. We thank the Biden Administration for its leadership in addressing climate change and also in ensuring lasting protections for our remaining mature and old-growth forests. Sincerely, Ann Vileisis President, Kalmiopsis Audubon Society