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Organization: John Muir Project

Title: Policy and Advocacy Director

Comments: February 2, 2024

President Joe Biden

Cc: Ali Zaidi, National Climate Advisor, The White House; Stephenne Harding, Council on Environmental Quality; Thomas J. Vilsack, Secretary of Agriculture; Deb Haaland, Secretary of Interior; Tracy Stone-Manning, Director of Bureau of Land Management,

Re: Request for an Executive Order to Place a Moratorium on Mature and Old-Growth Logging on National Forests and Bureau of Land Management (BLM) Lands While the Forest Service Old Growth Amendment EIS and Related BLM Rulemaking Proceeds

Dear President Biden,

On behalf of our members and supporters, we extend our appreciation for commencing the process aimed at protecting mature and old-growth (MOG) forests. While recognizing this positive step, we strongly urge immediate action, emphasizing that an executive order from President Biden, which could be signed and issued now, holds the highest potential to establish enduring protections for MOG forests for generations to come. Our request, along with those in the scientific community, includes issuing a moratorium on logging within MOG forests, and large trees generally, on all federal lands to ensure these forests are protected as the planning processes proceed to full protections for MOG.

We urge you to implement the following critical measures:

Acknowledgment of the Singular Threat to Forests: Logging

Identify logging as a primary threat to forest carbon storage and biodiversity and address it as the foremost concern. This is the only threat that the Forest Service and BLM can effectively cease.

Closure of Logging Loopholes for MOG Forests:

The Administration's current proposal includes a glaring loophole for logging under the guises of forest health or fire management, currently used to conduct logging that is degrading the integrity of MOG forests. We request you eliminate this loophole. While the felling of some roadside hazard trees may be permissible for human safety, prioritize preserving felled trees as crucial habitat and stored carbon.

#### Inclusion of Mature Forests:

Include full protection of mature forests from logging, not just old-growth forests, and recognize mature forests as vital components of future old-growth ecosystems. For the Administration's proposal to be truly meaningful, mature forests must not be excluded from protections. The Administration's current proposal leaves out mature forests, which is tantamount to excluding the entire eastern half of the nation, since very little old-growth forest remains in the eastern U.S., due to logging.

#### Enduring Protection Regardless of Natural Processes:

Commit to the enduring protection of designated areas, irrespective of future natural processes like insect outbreaks, wildfires, or wind storms. A deep body of science finds that MOG forests most often act as climate and wildfire refugia. When these forests experience natural disturbance processes, including patches of high-intensity fire, the resulting habitat is highly biodiverse and carbon-rich. MOG forests experiencing fire or other natural processes in recent years must be protected from logging, and current MOG forests must be protected permanently, including when future natural processes, like fire, occur.

#### Full Protection for Tongass Old-growth:

Remove the Tongass old-growth logging exemption from any further analysis in the upcoming EIS. Any financial incentive to log old trees on the Tongass conflicts with the conservation directive in EO 14072 and the global biodiversity and carbon importance of the Tongass that is currently transitioning out of old-growth logging.

Scientists have extensively documented the climate and biodiversity significance of mature and old-growth (MOG) forests, and large trees generally, in the continental United States and on the Tongass, offering valuable insights for protections based on the best available science. Moreover, it is important to emphasize that even in the case of large wildfires, they only consume less than 2% of tree carbon. In contrast, thinning operations release a considerably higher amount of carbon into the atmosphere over an equivalent area compared to wildfires.

The evidence is clear: we must cease logging in MOG forests, and large trees generally, both before and after natural processes, and refrain from blaming natural processes as a threat to these resilient forests.

We implore this Administration to exercise executive authority promptly, rather than postponing crucial decisions until after the election. The time to act, to protect MOG forests, and large trees generally, for climate change mitigation and biodiversity conservation, is now. The power is in your hands; we urge meaningful and immediate action based on the wealth of evidence available to make the right decisions for our citizens and the climate.

Sincerely (234 groups),

198 methods

350 Bay Area

350 Bay Area Action

350 Chicago

350 Eugene

350 Hawaii

350PDX

350 Salem OR

350 Seattle

350 Sonoma

A Community Voice ACORN

All Aspects Ecological Restoration and Arboriculture

Alliance for the Wild Rockies

American Jewish World Service

Animals Are Sentient Beings, Inc.

Anthropocene Alliance

Athens County's Future Action Network, ACFAN

Battle Creek Alliance & Defiance Canyon Raptor Rescue

Biodiversity for a Livable Climate

Biofuelwatch

Blue Mountains Biodiversity Project

California Chaparral Institute

California River Watch

Cascadia Climate Action Now

Cascadia Wildlands

Center for Responsible Forestry

Center for Sustainable Economy

Chattooga Conservancy

Choosing Green

Christians Caring for Creation

Clean Energy Action

Climate Action Now Western MA

Climate Communications Coalition

Climate Generation

Climate Healers

Climate Healing Chorus

Climate Reality Massachusetts Southcoast

Climate Writers

Coast Range Association

Coastal Plain Conservation Group

Color Brighton Green

Colorado Democratic Party - Energy and Environment Initiative

Concerned Citizens of Franklin County (MA)

Conservation Congress

Creation Justice Ministries

Deer Creek Valley Natural Resources Conservation Association

Deignan Institute for Earth and Spirit at Iona University

Democratic Socialists of America - Knoxville, TN

Disquiet Voices

Doctors and Scientists Against Wood Smoke Pollution

Dogwood Alliance

Don't Waste Arizona

Down East Coal Ash Environmental and Social Justice Coalition

Democratic Party of Oregon Environmental Caucus

Earth Ethics, Inc.

Earth Law Center

Earth Ministry/Washington Interfaith Power and Light

Earth Neighborhood Productions

Earth Path Sanctuary LLC

Eco Justice Collaborative

Eco-Integrity Alliance

ecoAmerica

Education, Economics, Environmental, Climate and Health Organization (EEEECHO)

Eighty2degrees Design Studio

Elders Climate Action

Empower Our Future

Endangered Species Coalition

Environmental Education Fund

Environmental Justice Ministry Cedar Lane Unitarian Universalist Congregation

Environmental Protection Information Center - EPIC

Edmonds Unitarian Universalist Congregation

Extinction Rebellion Portland

Extinction Rebellion San Francisco Bay Area

Extinction Rebellion Western Massachusetts

Feather River Action!

Forest Keeper

Forest Unlimited

Forests Forever

Foundation Earth

Fox Valley Citizens for Peace & Justice

Franciscan Action Network

Fridays for Future Orange County

Friends of Bell Smith Springs

Friends of Big Bear Valley

Friends of Inwood Hill Park

Friends of the Bitterroot

Friends of the Clearwater

Friends of the Ferdinand State Forest

Friends of Trees Committee of Restoring Earth Connection

Friends of Wakefield's NEMT Forest

Gallatin Wildlife Association

Gallatin Yellowstone Wilderness Alliance

Great Swamp Watershed Association

Greater Northfield Watershed Association

Greece Baptist Church Sustainability Team

Green Snohomish

Greenenvironment, LLC

Heartwood

Heirs To Our Ocean

Holloway Educational Resources

Human Nature, Tree Foundation

Indiana Forest Alliance

Inland Empire Task Force

Interfaith Oceans Program

In The Shadow Of The Wolf

John Muir Project

Kentucky Heartwood

Kettle Range Conservation Group

Klamath Forest Alliance

Kootenai Environmental Alliance

Last Tree Laws Massachusetts

Legacy Forest Defense Coalition

Life Net Nature

Los Padres ForestWatch

Love Our Land

Magnolia Forest Group

Mason County Climate Justice

Massachusetts Forest Watch

MO's Defensible Space

Mount Shasta Bioregional Ecology Center

Muslim Caucus - YDA

Native Ecosystems Council

Natural Capitalism Solutions

Natural Resources Law

New Jersey Forest Watch

New Jersey Highlands Coalition

New Mexico Climate Justice

Nicaragua Center for Community Action

North American Climate, Conservation and Environment (NACCE)

North Cascades Conservation Council

North Country Earth Action

Northwest Environmental Defense Center

Northwest Watershed Institute

NTS Group

Occupy Bergen County

Ohio Environmental Council

Oil and Gas Action Network

Old-Growth Forest Network

Olympic Climate Action

Olympic Forest Coalition

Olympic Park Advocates

One Earth

Oregon Unitarian Universalist Voices for Justice

Our City SF

Our Revolution Massachusetts - GND/Climate Crisis Working Group

Our Revolution Michigan

Our Revolution National

Outdooredge

Pacific Rivers

Partnership for Policy Integrity

Passaic River Coalition

Peace Action WI

People's Justice Council

People's Voice on Climate

Pisgah Defenders

Portland Raging Grannies

Presente.org

Progressive Democrats of America, Oregon Chapter

Protect Our Woods

Protect Thacker Pass

Public Employees for Environmental Responsibility

Putnam Progressives

Rachel Carson Council

Raritan Headwaters Association

RESTORE: The North Woods

Ridgeview Conservancy

Rocky Mountain Wild

San Diego County Democrats for Environmental Action

Santa Fe Forest Coalition

Satoria Sustainability Consulting

Save Massachusetts Forests

Save Our Woods

Selkirk Conservation Alliance

Shagbark

Shawnee Forest Defense

Shawnee Natural Area Guardians

Sisters of St. Dominic of Blauvelt, New York

Sisters Trails Alliance

Soda Mountain Wilderness Council

Sonoma County Climate Activist Network (SoCoCAN!)

South Umpqua Rural Community Partnership

Southern Forest Conservation Coalition

Spokane Audubon Society

Stand4Forests

Standing Trees

Sunflower Alliance

Support Roaring Rock Park

Swan View Coalition

Tahoe Forests Matter

Tennessee Heartwood

Terra Advocati

The Conservation Cooperative

The Enviro Show

The Forest Advocate

The Rewilding Institute

The Wei LLC

Timbuctoo Mountain Club

Thurston Climate Action Team (TCAT)--Tree Action Group

Treehuggers International

Trees as a Public Good Network

Turtle Island Restoration Network

U.S. Youth Advisory Council for the UN Ocean Decade

Umpqua Natural Leadership Science Hub

Umpqua Watersheds

Unitarian Universalists for a Just Economic Community

Unitarian Universalists for Social Justice

Unite the Parks

United Plant Savers

Utah Physicians for a Healthy Environment

Veterans for Peace

Virginia Interfaith Power & Light

Vote Climate

Wall of Women

Washington Green Amendment

Wasteful Unreasonable Methane Use

Water League

Waterspirit

Wenatchee350.org

Wendell State Forest Alliance

Western Watersheds Project

Wild Heritage, a Project of Earth Island Institute

Wild Hope magazine

Wild Nature Institute

Wild Watershed

WildEarth Guardians

Wilderness Watch

WildLands Defense

Williams Community Forest Project

Women's Earth and Climate Action Network

World Rainforest Fund

Yaak Valley Forest Council

Young Democrats of America Environmental Caucus

Young Democrats of America Jewish Caucus

Young Democrats of America Rural Caucus

ATTACHMENT: NGO MOG Letter - Comments were also included in text box; coded/completed.