

Data Submitted (UTC 11): 7/31/2022 8:00:36 PM

First name: J. William

Last name: Stubblefield. PhD

Organization:

Title:

Comments: Dear Secretary Vilsack and Secretary Haaland,

Thank you for taking the next steps to advance President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. As you are well aware, we confront multiple planetary emergencies, including a rapidly heating climate and accelerating extinction rates, both of which portend dire consequences for human civilization and ecosystem integrity. An essential component of our response to these threats is to protect the mature and old-growth forests that still exist, especially on federal lands, which are jointly owned by all of us and should be managed in such a way as to ensure a livable future. This is one of the simplest and most cost-effective climate policies the U.S. can deploy at scale. But time is running short: the climate and biodiversity crises are growing exponentially worse and it is critical that you fulfill the President's directive to provide lasting protections for these trees.

For the purpose of protecting these climate-critical forests from logging, 'mature' should be defined as trees over 80 years old. Using that definition as a benchmark would protect our most climate and carbon-critical forests, and only in rare and exceptional circumstances should logging of these elders be allowed. Protecting mature forests and trees today will provide the foundation to recover old-growth ecosystems that have largely been lost to logging across the landscape-

President Biden's Earth Day Executive Order rightly recognized the critical role mature and old growth forests play as a climate solution, and the urgent need to confront the threats forests face. If continued harvesting of these trees is allowed the climate crisis will only worsen. Timber harvesting kills more trees than fire, insects, and wind combined. Less than five percent of our nation's timber comes from our national forests; therefore, it would not be a great hardship to eliminate this source of wood products and instead allow our public forests to provide ecological services such as clean air, clean water, and wildlife habitat.

If the Biden administration is to do all it can - and must - to limit atmospheric carbon levels, and demonstrate international leadership, these protections must be made through binding regulations that will endure in future administrations, much as the Clinton-era Roadless Rule has done. To ensure a rule can be adopted on the necessary urgent time frame, with opportunity for robust public engagement and environmental review, it is critical for federal agencies to initiate a rule-making process as soon as possible.

In summary, I strongly urge the US Department of Agriculture and US Department of Interior to work together immediately to initiate a rulemaking based on a definition of mature forests and trees over 80 years, to permanently end the avoidable loss of their critically important carbon, water and wildlife values to logging.

Sincerely,

J. William Stubblefield, PhD