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Comments: I am a member of the old growth forest network. A forest that we protected in 2004 is now part of that network. This forest resides in the City of Atlanta amongst millions of people. 1000s of community hours have been spent caring for it and connecting neighbors. Old growth forests are valuable on their own, however, they also energize human connectivity to the earth.

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, we urge the US Department of Agriculture and US Department of Interior to work together to soon 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.