

Data Submitted (UTC 11): 8/1/2022 3:10:19 PM

First name: Lucy

Last name: Duff

Organization:

Title:

Comments: Thank you for taking the next steps to advance President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. Protecting our remaining mature and old-growth forests and trees on federal lands represents one of the simplest and most cost-effective climate policies the U.S. can deploy at scale. Since the climate and biodiversity crises are growing exponentially worse, it's now critical that you fulfill the President's directive to provide lasting protections for these trees.

In order to protect these climate-critical forests from logging, I'd say 'mature' should be defined as trees over 80 years old. That definition would include our most climate and carbon-critical forests, which should not be logged except in rare and exceptional circumstances. Protecting mature forests today will provide the foundation to recover old-growth ecosystems now largely lost to indiscriminate logging.

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, let's see that the US Department of Agriculture and US Department of Interior work together soon to initiate a rulemaking based on a definition of mature forests and trees over 80 years.