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Comments: As a stakeholder, I strongly urge you to protect old-growth and mature trees in federal forests. These trees are crucial for combatting the climate crisis, as 35 million metric tons of carbon is sequestered from the atmosphere by federal forestlands and 17.2 billion metric tons of carbon is stored in US federal forests. Research indicates that logging of federal forests is a substantial source of carbon dioxide emissions to the atmosphere that is at least comparable to levels associated with wildfires.

To achieve meaningful protections, it is essential to adopt a definition of "mature" that truly encompasses all mature trees. I urge you to define mature trees as all trees 80 years and older. 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 giants be allowed. These forests collectively contain the bulk of the carbon already stored in federal forests and they continue to sequester carbon at high rates. These trees provide vital wildlife habitats, clean air, clean water, and resilience against floods and droughts.

This definition framework is a great first step, but I urge you to move quickly to a rulemaking to provide durable protections from logging, especially as there are old-growth and mature trees currently at risk of being cut down - an action that is truly irreparable. 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 logging of these trees is allowed, the very values that let them play a vital role will be eliminated. This rule can easily protect mature and old-growth trees from logging, while allowing ecologically appropriate restoration and fire mitigation.

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.