Data Submitted (UTC 11): 7/31/2022 12:00:00 AM
First name: Jenna
Last name: Ayers
Organization:
Title:
Comments: My name is Jenna Ayers and I am a young adult afraid about Earth's future. I see ecocide and genocide all around.

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 know, 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. 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 no older than 80 years. By establishing the age of mature forests and trees at 80 years, federal agencies will establish a safety net that assures minimum protection of the ecological and carbon benefits they provide for future generations. These forests collectively contain the bulk of the carbon already stored in federal forests and they continue to sequester carbon at high rates. They also provide, across forest types, vital habitat and biodiversity benefits, and important sources of drinking water for communities. Critically, protecting mature forests and trees today will provide the foundation to recover old-growth ecosystems which 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 logging of these trees is allowed, the very values that let them play a vital role will be eliminated. Losing more of our mature &amp; old-growth trees and forests to logging will only make the climate crisis worse: Scientific research indicates that logging of federal forests is a major source of carbon dioxide emissions to the atmosphere that is at least comparable to, and probably greater than, levels associated with wildfires.

A recent USDA Secretarial Memorandum stated that "A primary threat to old-growth stands on national forests is no longer timber harvesting, but rather catastrophic wildfire and other disturbances resulting from the combination of climate change and past fire exclusion." This statement represents an alarming and inaccurate assessment of threats to mature and old-growth forests. Numerous examples of logging projects across the country that target mature and old-growth trees, including projects in the name of "restoration", "hazardous fuels reduction" and "wildfire mitigation," underscore this point. Not only is the threat of logging to mature and old-growth federal forests pressing, but it is also one that is entirely within federal land management agencies' power to address. Such a rule can be readily structured to leave room for ecologically appropriate risk reduction of uncharacteristic wildfire, which is very largely driven by small trees and brush, not big, fire-resistant trees that have survived for generations.

If the Biden administration is to do all it can &mdash; and must &mdash; 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 the 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 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 as no older than 80, to permanently end the avoidable loss of their critically important carbon, water and wildlife values to logging.