

Data Submitted (UTC 11): 8/1/2022 12:00:00 AM

First name: DEREK

Last name: DEXHEIMER

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. It is imperative we protect our remaining mature and old-growth forests and trees on federal lands as quickly and comprehensively as possible.

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.

Old-growth forests must be safe from harvesting under the guises of "restoration", "hazardous fuels reduction" and "wildfire mitigation." This threat is entirely within federal land management agencies' power to address. Such rules 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 — 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 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.