

Data Submitted (UTC 11): 8/3/2022 12:00:00 AM

First name: Marc

Last name: Imlay

Organization:

Title:

Comments: Thank you for taking the next steps to advance President Bidens 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. But time is running short: the climate and biodiversity crises are growing exponentially worse, and its critical that you fulfill the presidents directive to provide lasting protections for these trees.

While your agencies work to define and inventory mature and old-growth forests, logging continues within these special areas, often under the guise of reducing wildfire risk. Thats why I urge you to enact an immediate moratorium on logging of mature and old-growth forests until the inventory process is complete and more permanent protections can be put in place.

For the purpose of protecting these climate-critical forests from logging, mature should be defined as trees 80 years old. Using that benchmark would protect our most climate- and carbon-critical forests. 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 vital habitat and biodiversity benefits and are 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 Bidens Earth Day Executive Order rightly recognizes the critical role mature and old-growth forests play as a climate solution and the urgent need to confront the threats that forests face. If logging these trees continues, the very values that let them play a vital role will be eliminated. Losing more mature and old-growth trees and forests to logging will only worsen the climate crisis. Scientific research indicates that logging of federal forests is a major source of carbon dioxide emissions to the atmosphere thats at least comparable to, and probably greater than, levels associated with wildfires.

A recent USDA Secretarial Memorandum stated, 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 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, its one thats entirely within federal land management agencies power to address.

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 in the necessarily urgent time frame, with opportunity for robust public engagement and environmental review, its critical for federal agencies to begin a rule-making process as soon as possible and enact a logging moratorium until new protections are in place.

I urge the U.S. Department of Agriculture and U.S. Department of the Interior to work together to soon initiate a rule-making process based on a definition of mature forests and trees of 80 years old in order to permanently end the avoidable loss of their critically important carbon, water, and wildlife values to logging.