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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. 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. 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 store most the carbon sequestered in federal forests, and they continue to sequester carbon at high rates. They also provide, across forest types, vital habitat and biodiversity benefits, shade for cooling and soil water retention, protection against erosion, 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 trees, once cut down or lost to fire, cannot be simply replaced by a newly planted tree. Most of the carbon stored in a tree is sequestered in its later years; therefore a young tree sequesters less carbon per year than an old tree. Losing more of our mature & 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. Wildfires and other climate change induced disasters present uncontrolled threat to forests. Since logging is a controllable threat, federal agencies must maximally exercise their authority to remove this threat to irreplaceable forests.

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. These protections must be made through binding regulations that will endure in future administrations, much as the Clinton-era Roadless Rule has done, and done so expeditiously. Please quickly initiate a rule-making 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.