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Comments: 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, 'mature' should be defined as trees over 80 years old. 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 elders be allowed. Protecting mature forests and trees today will provide the foundation to recover old-growth ecosystems that have largely been lost to logging across the landscape-

Timber harvesting kills more trees than fire, insects, and wind combined. Less than five percent of our nation's timber comes from our national forests; therefore, it would not be a great hardship to eliminate this source of wood products and instead allow our public forests to provide ecological services such as clean air, clean water, and wildlife habitat.

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.

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