

Data Submitted (UTC 11): 8/11/2022 8:33:37 PM

First name: Janna

Last name: Treisman

Organization:

Title:

Comments: Greetings:

I live in the Pacific Northwest, once home to vast stretches of old growth forests. The few areas of old growth that remain speak to the majesty and value of what was lost to logging and fragmentation over the past years. It is imperative that we conserve, protect and cherish what remains.

Thank you for taking the next steps to advance President Biden's Executive Order on "Strengthening the Nation's Forests, Communities, and Local Economies." Protecting our remaining mature and old-growth forests and trees from logging and development on federal public lands represents one of the simplest and most cost-effective climate policies the U.S. can deploy. Literally nothing needs to be done on-the-ground and no money spent (except on the effort to map them), we simply need to restrain ourselves from logging, i.e., any cutting and removing of mature and old forests/trees, from these areas.

-The mature and old-growth trees on our federally managed lands are one of this country's greatest resources: these forests protect our drinking water, provide critical habitat for wildlife, prevent erosion and flooding, and -- because of how much carbon they sequester and store -- are an essential climate solution. In 2019, the carbon sequestered in federally managed forests offset approximately 12% of the United States' greenhouse gas emissions.

-I urge the U.S. Department of Agriculture and U.S. Department of the Interior to work together immediately to initiate a rule-making process based on a minimum definition of mature forests and trees of 50 years old and older, (to be adjusted by region, ecosystem and species to capture the age of reproductive maturity for all tree species), in order to permanently end the avoidable loss of their critically important ecosystem, carbon, water, and wildlife values to logging.

-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 developments 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, it is one that is fully 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 mature trees that have survived for generations.