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Comments: I grew up in the Pacific Northwest, deeply connected to the forests and water, and all wildlife. I have seen changes and loss over time due to human causes and am devastated by the loss of our old growth and mature forests.

Thank you for taking comment on President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. Protecting our mature and old-growth forests and trees on federal lands represents one of the simplest and most cost-effective climate policies the US can deploy. But time is running out: the climate and biodiversity crises are growing exponentially worse and there is an urgent need to provide lasting protections for these inordinately valuable forests.

Mature forests provide many of the ecological roles as fully functional old growth, such as storing carbon in large live and dead trees, attenuating flood events, and providing crucial wildlife habitat. Over time, mature forests will recover depleted areas. Scientists estimate less than 1/5 of the region's mature and old-growth forests survived earlier decades of industrial logging and development.

Mature and old-growth forest definitions must be concise, simple, and effective. The regional policy for the Pacific Northwest defines mature trees as trees 80 or older. Applying this definition more broadly in policy will conserve our most climate and carbon-critical forests. Such forests collectively contain the bulk of the carbon currently stored in federal forests and they continue to sequester carbon at substantial rates. They also provide, across forest types, vital habitat and biodiversity benefits, and important sources of drinking water and clean air for communities.

President Biden's Executive Order rightly recognized the critical role mature and old-growth forests play as a natural climate solution, and the urgent need to confront the threats forests face. One of the most pressing threats to older forests is federally sanctioned logging, currently underway or under development. Restoration forestry has an important role but losing more of our mature and old-growth trees and forests to logging that undermines ecological resilience will only make the climate and biodiversity crisis worse.

We must do we all we can to limit atmospheric carbon levels. To protect remaining critical wildlife habitat, mature and old-growth forest protections must be made durable in a formal rule, so that they will endure into the future. To ensure a rule is adopted quickly 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 quickly initiate rulemaking based on a definition of mature forests and trees as 80 years or older and to permanently end the avoidable loss of their critically important carbon, water and wildlife values to irresponsible logging and other threats.

Sincerely,
Nancy Shimeall