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Comments: Dear Secretary Vilsack and Secretary Haaland,

Thank you very much for your involvement on President Biden's Executive Order to strengthen the Nation's forests, along with communities and local economies. As you are well aware, the protection of our old growth forests is crucial and vital for mitigating the effects of climate change and biodiversity crises, which are both growing exponentially in severity. There is now an urgent need to protect these forests given the urgency of our environmental issues.

The different stages in the growth of forests incorporate both mature and old-growth forests. There are many ecological benefits to old-growth forests, in which they provide much needed functions, such as the storing of carbon in large trees which are either dead or alive, reduce flood events, and allowing vital wildlife habitat. Over time, mature forests will recover depleted areas, which scientists, along with old-growth, have estimated to have survived by less than 1/5 of previous sizes by past decades of industrial logging and development.

Mature and old-growth forest definitions must be concise, simple, and inclusive to be operationally effective. The regional policy for the Pacific Northwest defines mature trees as trees 80 or older. Applying this definition more broadly in a protective 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.

If we are to do all we can - and must - to limit atmospheric carbon levels and protect remaining critical wildlife habitat, mature and old-growth forest protections must be made durable in a formal rule, so that they will better endure into the future. To ensure a rule is adopted quickly, with an 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 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,

Matthew Helgeson