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Comments: Dear Secretary Vilsack and Secretary Haaland,

Thank you for taking comment on President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. As you know, 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 short: 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 and old-growth refer to stages in forest successional development. 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 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,

Dan Struble