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Comments: Dear Secretary Vilsack and Secretary Haaland,

Protecting 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. However, current 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 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.

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 these forests face. Restoration forestry has a role, but losing more mature and old-growth trees and forests to logging that undermines ecological resilience will make the climate and biodiversity crisis only worse.

We must limit atmospheric carbon levels and protect remaining critical wildlife habitat, and mature and old-growth forest protections must be made durable in a formal rule, so that they will better endure into the future. It is critical for federal agencies to initiate a rule-making process as soon as possible.

I urge the U.S. Department of Agriculture and U.S. 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,

Stephen De Blois