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Title: President

Comments: Thank you for taking steps to implement President Biden's Executive Order. I am a retired professional wildlife biologist that has monitored and still continues to work on restoration efforts on forest land. There is absolutely no more important action that the USFS can take since its inception by Thodore Roosevelt and Gifford Pinchot to protect the present and future forests of the United States than the action of protecting all mature and old growth forest from logging. The faulty agricultural management paradigm that has been in place since post world war II has caused huge threats to forests, increased fire severity, and it now puts huge landscapes into the que for total loss of forests by processes moving towards desertification. Our forests which are critical for our national security and health are now in an existential crisis. What they need most is to be left as intact as possible despite what fire managers say. You see, the process of desertification starts with removing the forest's tree biomass be it logging or fuel reduction or insects. No one wants our National Forests to become something they were not because of logging, fire management fuels treatments and climate change. Post logging replanting does not replace the biomass that functions in hundreds of ways both when alive and dead in a forest including maintaining microclimate and water in drought cycles that we know are not going away any time soon thanks to wrongful human management actions. The issues are false paradigms like a "build up of fuels" because of lack of logging when in fact less than 5% of the forests are older "unmanaged" forest and the mature forests as well as the old forests are known to be more fire resilient. It is the disturbance and removal of the biomass from the forest that is the problem. Another false paradigm is that bark beetles are causing a problem so we need to remove trees. Again the bark beetles are not the problem drought is and when you remove the trees your are removing the biomass that is needed to fight the drought. You can't fix the problem by removing the trees and the false paradigm of "competition" so you have to "thin" out unmanaged stands by foresters is destroying the very processes that the forest has to maintain itself. Science has fully demonstrated that it is the trees that can help themselves through their mother trees, and the dead trees that provide the food and moist microclimate for the micorrhizae network (Suzanne Simard) . Instead, logging and fuels management is making it harder for the forests to recover from drought by removing the biomass that is supposed to function on the land and into the soil to support its recovery.

The USFS is supposed to prevent managment activities that cause adverse impacts. We are now far beyond small individual adverse inpacts of an area. You cannot replace the huge loss biomass energy that the forest needs to function by replanting. Given the climate change issues as they stand today there is no guarantee that trees in the classic post logging biomass poor plantations will ever become something more than fire match sticks yet bot the USFS and BLM are still planning "regeneration" logging which science evidence and personal experience has demonstrated creates severe fire hazards. We already have too much landscape stands of small diameter water inefficient plantations removing over 50% of our much needed water (Julia Jones and Timothy Perry OSU 2017) and stressed out from drought because we took everything that the forest needs to maintain itself. This loss of water to the people alone is illegal according to current laws and I personally am impacted by this loss. We also have tons of evidence that these activities and the expensive roads that service them are eliminating the storage of ground water. Time is running short. The loss of biological diversity, the climate, the loss of water are all growing worse exponentially therefore it is critical that you fulfill the President's directive to provide lasting protections for these areas. In fact the logging that your agency continues to persue under the false excuse of wildlfire risk is horribly gut wrenching to say the least. Will we have enough drinking water? How much more will it cost? Having lived here for 40 years I watch water trucks now daily go up and down my road to fill peoples water tanks since they no longer have spring/well water along with the parade of log trucks and gravel trucks for the past 20 years totally liquidating the mature trees of the forest in the watershed I live in. Of course next will be the fires that tear through the plantations. I have seen the patterns and they are obvious. That is why the very first action that needs to be taken is to put an immediate moratorium on logging of mature and old-growth forests/trees - until the inventory process is complete and permanent protections are in place.

For the purpose of this immediate moratorium, individual trees and forests that have enough of these mature and older trees and stands of trees, whether burned in a fire (dead or alive) or unburned, that are 50 years old or older, should be excluded from cutting and removal in any areas where logging operations are allowed, and should be prohibited from being cut and removed in any area where logging operations have been approved. There is no amount of money and "restorative action" the agency can do that meets the absolute value of this and the agency is responsible to the public trust to utilize the best value. The agency should not log out these trees for any reason including the various euphemisms used by the agencies to authorize the cutting and removing of trees, e.g. thinning, clearcutting, shelterwood cut, group selection, fuel break, restoration, reforestation, fire risk reduction, gap treatment, regeneration, hazardous fuels treatment, etc.. Using this benchmark will ensure that our most climate-and carbon-critical forests are protected while the mapping project is completed and permanent protections are put in place. These mature and old forests burned or unburned are the cornerstone, the keystone structure absolutely necessary for forest recovery and their very existence through the era of climate change.