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First name: Cynthia

Last name: Bethell

Organization:

Title:

Comments: I am writing to urge the US Department of the Interior and US Department of Agriculture to immediately begin a rulemaking process that ensures strong, durable protections for mature and old-growth trees and forests across federal lands as a cornerstone of U.S. climate policy. Conserving our mature and old-growth trees and forests represents one of the simplest and most cost-effective climate solutions available. Implementing this rule would support a powerful natural climate solution, helping us address the unprecedented threats of climate change and biodiversity loss while also safeguarding vital sources of clean water and recreation for all Americans.

Earth Day Executive Order 14072, Strengthening the Nation's Forests, Communities, and Local Economies, and the recent Secretarial Memorandum, Climate Resilience and Carbon Stewardship of America's Forests and Grasslands, describe the indispensable value that mature and old-growth forests provide. Unfortunately, across the country on federal forests, numerous logging projects that cut mature and old-growth trees continue to move forward. Guidance issued to the Forest Service does not acknowledge the threat the agency's own logging projects pose. Instead, the USDA guidance falsely denies the active logging of centuries-old forests and refuses to outline any meaningful steps to actually protect mature and old-growth forests.

It is unacceptable that, rather than taking steps to protect our forests and climate, the President's Executive Order is being wilfully misinterpreted to reinforce the status quo and justify more destructive logging.

The Department of Interior and Department of Agriculture must take much bolder action if the Biden administration is to truly embrace mature and old-growth forest conservation as a natural climate solution. That action must include an open, transparent public engagement process that results in meaningful, lasting regulations that endure as a climate legacy.

Ensuring strong, durable protections for mature and old-growth forests is complementary to federal agencies' efforts to meet other management objectives, including securing clean drinking water for communities in a rapidly changing climate where droughts and floods are becoming more common; improving wildfire resilience by protecting large fire-resistant trees; and enhancing access to outdoor recreation opportunities.

This is an opportunity to give permanent effect to key climate provisions in the President's order and position the United States as an international leader in forest conservation and natural climate solutions, offering a model for other nations to follow. We cannot afford to delay. Thank you.