

Data Submitted (UTC 11): 8/15/2022 5:35:22 PM

First name: Nancy

Last name: Polan

Organization:

Title:

Comments: Thank you for taking the next steps to advance President Biden's Executive Order on "Strengthening the Nation's Forests, Communities, and Local Economies." Protecting our remaining mature and old-growth forests and trees from logging and development on federal public lands represents one of the simplest and most cost-effective climate policies the U.S. can deploy. Literally nothing needs to be done on-the-ground and no money spent (except on the effort to map them), we simply need to restrain ourselves from logging, i.e., any cutting and removing of mature and old forests/trees, from these areas.

But time is running short: the climate and biodiversity crises are growing exponentially worse, and it's critical that you fulfill the president's directive to provide lasting protections for these areas. In fact, while your agencies work to inventory mature and old-growth forests, logging continues, often under the false claim of reducing wildfire risk. That's why the very first action that must be taken is the issuance of 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 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 already been approved. Logging operations shall include any 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, hazardous fuels reduction, 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. The forests which fit into this definition collectively contain the entirety of reproductively mature conifer species and the vast majority of carbon currently stored in federal forests. These mature and old forests, whether fire-affected or unburned, are the cornerstone of our forest ecosystems, also provide vital habitat and biodiversity benefits and are important sources of drinking water for communities. Protecting the oldest old-growth forests and legacy trees that exist today from being cut down is of course critical, but protecting mature forests and trees today is also essential. For it is these trees/forests that will provide the foundation to recover old-growth ecosystems tomorrow, systems which have largely been wiped off the map due to expansive logging across the United States.

President Biden's Earth Day Executive Order rightly recognizes the critical role mature and old-growth forest ecosystems play as a climate solution and the urgent need to confront the threats that forests face. Unfortunately, this Executive Order inaccurately claims that the threats to these ecosystems are from wildfires and other natural disturbances, setting the stage to inappropriately justify logging these areas to save them. But under no circumstances could the logging (i.e. killing with a chainsaw and removing from the forest) of mature and old-growth trees or stands be seen as protection. The reality is, if logging these trees continues, the very attributes that enable these forested areas to play their vital role in our fight against climate change will be eliminated. Losing more mature and old-growth trees and forests to chainsaws will only worsen the climate crisis. Especially since logging in the United States currently contributes as much carbon to the atmosphere annually as burning coal. Logging operations (as described above) also do not stop wildfires, and wildfires that burn through areas that have been logged (whether clear cut or "thinned") tend to burn faster and more intensely than when burning through mature and old-growth forests that have been protected from logging.

Almost every logging project currently planned across the country targets some mature and old-growth trees/stands for removal, including projects in the name of "restoration," "hazardous fuels reduction," and "wildfire mitigation," underscore this point. Not only is the threat of logging to mature and old-growth federal forests

pressing, it's one that federal land management agencies actually have control over.

If the Biden administration is to do all it can-and must-to limit atmospheric carbon levels and demonstrate international leadership, protecting mature and old growth trees/stands from logging must be made through binding regulations that will endure in future administrations, much as the Clinton-era Roadless Rule has done. To ensure a rule can be adopted in the necessarily urgent time frame, with opportunity for robust public engagement and environmental review, it's critical for federal agencies to begin a rule-making process as soon as possible and enact a logging moratorium until new protections are in place.

I urge the U.S. Department of Agriculture and U.S. Department of the Interior to work together immediately to initiate a rule-making process based on a minimum definition of mature forests and trees of 50 years old and older, (to be adjusted by region, ecosystem and species to capture the age of reproductive maturity for all tree species), in order to permanently end the avoidable loss of their critically important ecosystem, carbon, water, and wildlife values to logging.