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Comments: I am writing to submit my comments on Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. As a life long nature lover, person with graduate level education in biology, and a concerned citizen, I strongly feel our old-growth forests remain one of our countries greatest assets and that they are worth far more when left intact than when heavily logged. Protecting what little remains of our mature and old-growth forests on federal lands represents one of the simplest and cost-effective climate policies we have. However, according to the vast majority of biologists, ecologists, and climate scientists, time is running out to prevent catastrophic changes to our home. The climate and biodiversity crises are growing exponentially worse and it is critical that you fulfill the President's directive to provide lasting protections for these trees.

Obviously different species of trees have different lifespans and therefore what is "old growth" for an aspen is different than what is "old growth" for a redwood. However, in the interest of habitat preservation, biodiversity, and carbon storage, we need to have something uniform. For the purpose of protecting these climate-critical trees and forests from logging, "mature" should be defined as 80 years and older. By setting logging limits using this definition, federal agencies will establish a safety net that assures minimum protection of the ecological and carbon benefits these older forest elements provide for future generations. These older forests and big trees collectively contain the bulk of the carbon already stored in federal forests and they continue to sequester carbon at high rates far into the future. They also provide, across forest types, vital habitat and biodiversity benefits, water for communities. Critically, protecting mature forests and trees today will provide the foundation to recover old-growth ecosystems which have largely been lost to logging across the landscape.

President Biden's Earth Day Executive Order rightly recognized the critical role mature and old-growth forests play as a climate solution, and the urgent need to confront the threats forests face. If continued logging of these trees is allowed, the very values that let them play a vital role will be eliminated. Losing more of our mature & old-growth trees and forests to logging will only make the climate crisis worse: Scientific research, including that from USFS scientists, states poorly managed logging of federal forests is a major source of carbon dioxide emissions to the atmosphere.

A recent USDA Secretarial Memorandum stated that "A primary threat to old-growth stands on national forests is no longer timber harvesting, but rather catastrophic wildfire and other disturbances resulting from the combination of climate change and past fire exclusion." This statement represents an alarming and inaccurate assessment of threats to mature and old-growth forests. Numerous examples of logging projects across the country that target mature and old-growth trees, including projects in the name of "restoration", "hazardous fuels reduction", "thinning", and "wildfire mitigation," underscore this point. Not only is the threat of logging to mature and old-growth federal forests pressing, but it is also one that is entirely within federal land management agencies' power to address. Such a rule can be readily structured to leave room for ecologically appropriate risk reduction of uncharacteristic wildfire, which is very largely driven by small trees and brush, not big, fire-resistant trees that have survived for generations.

If the Biden administration is to do all it can - and must - to limit atmospheric carbon levels, and demonstrate international leadership, these protections 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 on the necessary urgent time frame, with the opportunity for robust public engagement and environmental review, it is critical for federal agencies to initiate a rule-making process as soon as possible.

In summary, I urge the US Department of Agriculture and US Department of Interior to work together to soon initiate a rulemaking based on a definition of mature forests and trees as 80 years and older, to permanently end

the avoidable loss of their critically important carbon, water, and wildlife values to logging. The future of ours and many other species depends on it.