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Comments: I condemn your decision to brazenly, flagrantly defy the recent Earth Day Executive Order 14072 concerning old-growth forests. Your 'Secretarial Memorandum' purporting to respond to the EO simply reinscribes and affirms the existing destruction of old-growth forests by the Forest Service and Bureau of Land Management.

The Memorandum rationalizes this posture with the demonstrable falsehood that '...a majority of our mature and old-growth forests on federal lands are already in a protected status,' a sadly laughable assertion for those witnessing the horrifying churn of Forest Service and BLM-licensed chainsaws against centuries-old trees at this moment. Where the EO directs the DOI and BLM to 'identify' threats to old-growth forests, the relevant agencies need only look in a mirror, and particularly at their federal land logging staff who continue their antiquated resource extraction, unmoved by newer ecological, climate, and moral considerations. The objectives of the EO can only be fulfilled through a national permanent moratorium on logging of old-growth forests.

Many of the stated ecological and climate goals of the Biden Administration have been treated as mere platitude and commentary by the relevant agencies, including the Forest Service and Bureau of Land Management, which carry on their ecologically malign resource extraction program. In particular, no agency that claims to take climate change seriously can log old-growth forests and vaporize these voluminous carbon sinks, yet the FS and BLM are doing so today. The Forest Service and BLM appear blissfully unaware that these immense stores of carbon exacerbate global warming, when timber companies shred them to pulp, leaving the corpse to oxidize and desiccate under the open sky.

This continued old-growth logging reflects the seemingly interminable inertia of the Forest Service and BLM timber programs from a generation or two ago, which agency staff stubbornly refuse to discard no matter how harmful it becomes. Old-growth logging also explicitly ignores the overriding national interest in protecting this critical component of Earth's life-support system. Federally owned lands are home to a large portion of the ancient forest remaining in American jurisdiction, and its destruction constitutes a heinous abdication of America's responsibility to maintain Earth's palette of biodiversity and its life-sustaining capacities of oxygen production and carbon sequestration.

Our remaining old-growth forests are national treasures, whose biological value vastly outweighs the value of any timber that will be extracted from it and dumped onto markets for pulp and lumber whose gross waste into landfills is disproof of any acute need for supplemental inputs from federal land. This exchange of a high-value biological treasure for a low-value commodity of wood pulp and lumber is the exact antithesis of serving the public interest with a basis in rationality, science, and moral common sense. Sadly, through some combination of administrative inertia and professional myopia, the Forest Service and BLM management teams continues to view themselves as on-call service providers to the highly subsidized local timber racket, and beholden to politicians who direct this mercantilist arrangement, rather than as public servants to all Americans.

The Forest Service and BLM must also divorce their fire risk mitigation from their logging program, which today are financially and administratively joined, but act at ecological and scientific cross-purposes. Old-growth forests are consistently found to be the most fire-resistant forest type, while the 'young-seral' stands so beloved of timber planners most frequently erupt in flames in today's perennial fire season. If these agencies are serious about reducing wildfire severity in the coming century of climate change, they must devote their chainsaws to selective thinning of second-growth stands and timber plantations, to accelerate their canopy closure while reducing their understory. These activities do not slake the pecuniary appetites of the timber industry, and will demand clarity of ecological thinking by Forest Service and BLM staff, while relinquishing the raw resource extraction program of

bygone decades and the parasitic industry tied to it.

Again, I urge you to withdraw your cynical and desultory memorandum, and instead promulgate a rule with a permanent and universal moratorium on logging these forests. Direct the Forest Service and BLM to complete their long-tarried transition to responsible ecological management that includes genuine fire risk reduction through selective cutting of secondary stands, uncorrupted by countervailing industry motivations to grab the biggest trees. Thank you for your attention to this urgent issue.