

Data Submitted (UTC 11): 8/20/2022 10:53:49 PM

First name: Jennifer

Last name: Normoyle

Organization: Environmental Advocate, Concerned Citizen

Title: Dr.

Comments: Dear Secretary Vilsack and Secretary Haaland,

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 the remaining mature and old-growth forests and trees is one of the simplest and most cost-effective climate policies the U.S. can deploy at scale. Communities throughout the Pacific Northwest (PNW) and California are threatened by climate-driven wildfires. By protecting our oldest, biggest trees that are most resistant to wildfire, we are also ensuring community safety and protection. It is critical that you fulfill the President's directive to provide lasting protections for these trees.

While EO 14072 correctly enumerates the many threats that climate change-enhanced drought and disturbances pose to mature and old-growth forests, it erroneously fails to include ongoing logging as a threat to older federal forests and trees. There are numerous logging projects across the PNW and California that target mature and old-growth trees that underscore this point. These forests collectively contain the bulk of the carbon already stored in federal forests and they continue to sequester carbon at high rates. If continued logging of these trees is allowed, the vital role they play in the fight against climate change will be eliminated.

For the purpose of protecting these climate-critical forests from logging, 'mature' should be defined as trees 80 years old. Many forests in the Pacific Northwest and California are fire-prone, and wildfire potential will increase with climate change. However, several studies over the past decade have found that older forests are more fire resilient than younger, second-growth forests. Using an 80-year definition framework as a benchmark would capture the most fire-resistant trees and carbon-storing forests. Land management can be directed toward protecting homes and communities from wildfire and forest resiliency projects that help safeguard older forests. Exceptions for logging trees over 80 years must be scientifically defensible while protecting biodiversity values and encouraging management that restores older forest character.

A broad definition of mature and old-growth will also help ensure the restoration of mature and old-growth forest ecosystems in the Pacific Northwest and California. Such an approach will better ensure that there is enough redundancy in the definition of mature and old forests to allow for natural disturbances and subsequent losses over time under climate change.

Old-growth forests of the Pacific Northwest are some of the best in the world for carbon storage and sequestration. The older trees in our nation's forests are climate champions-absorbing and storing carbon for centuries and helping slow down climate change. Old forests with fire-resistant trees can also help buffer communities from extreme wildfires. The Biden administration must do everything it can to ensure lasting protections for our remaining mature and old-growth forests.

In summary, we urge the USDA and DOI to work together to create durable policies based on a definition of mature forests and trees of 80 years, to permanently end the avoidable loss of their critically important carbon, water and wildlife values to logging.