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Comments: Dear Secretary Vilsack and Secretary Haaland,

Last Earth Day President Biden issued an executive order calling on the Forest Service and Bureau of Land Management to conserve mature and old-growth forests as a climate solution. This was a momentous step towards meaningful protections, but now it's up to us to ensure that this turns into real and lasting changes in how federal agencies manage - and protect - older forests.

Thank you for taking the next steps to advance President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. As you know, protecting our remaining mature and old-growth forests and trees on federal lands represents one of the simplest and most cost-effective climate policies the U.S. can deploy at scale. But time is running short: 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.

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, and important sources of drinking 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 indicates that logging of federal forests is a major source of carbon dioxide emissions to the atmosphere that is at least comparable to, and probably greater than, levels associated with wildfires.

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" 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.

In response to the executive order, the Dept of Agriculture and the Dept of Interior have opened an official public comment period to solicit feedback on how "to define, identify, and complete an inventory of old-growth and mature forests on Federal lands." It is critical that we demonstrate widespread, overwhelming public support from every corner of the country for urgent action to permanently protect mature & old growth forests and trees across all federal lands. The Forest Service and BLM continue to log these forests and trees, badly damaging their ability to store climate pollution and to preserve biodiversity-and setting a terrible precedent internationally. There are limited chances for the public to weigh in, so we need to take advantage of every opportunity.

I would like to show support for the concept of saving Old Growth Forests throughout the Country as a show of support for the future of our world and the next generations. Many of the Old Growth has been logged without considering their immense value still standing. These are majestic trees and forests that hold and store enormous amounts of carbon in their systems that will stay in place for 100 or more years. They are the lifeline to the destructive methods that we have released carbon into our atmosphere and left our children with an overheated world and climate in crisis.

Old Growth are those trees and forests that have been left to grow in their natural state for 80 to 800 years and building up a groundcover of native vegetation that adds to that carbon storage system. Old Growth are stately trees that have carbon built up inside that rivals the smaller trees that are planted to replace them in tree farms of the west. Old Growth trees grow slowly but store more than younger trees because of their width and mass. Each year they store more than all the smaller trees around and are the most important ones. When I see Old Growth trees in the woods, they do not take up a lot more space than a smaller one but store a mass that is bigger and more solid than others.

Old Growth trees store more water than younger ones and can release and protect the watershed storage capacity better. They provide shade and vegetation mulch that is important to the temperature of the air and forest groundcover. Younger tree stands take more water to maintain their life cycle and the Old Growth trees are the best at storing and releasing water to stream systems. They also protect the undergrowth more than smaller trees. The undergrowth plants such as ferns, salal, Oregon grape, etc. are great forest plants that keep the ground health.

There are many reasons to save more Old Growth trees for the future. Vegetation, wildlife habitat, and water release are great reasons. Cooling, survival of the species, and overall climate change protection are others. In short, please do all you can to save and keep the Old Growth forests and trees for the future generations to enjoy and protect the planet.