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Comments: We applaud the Biden administration for their recognition of the critical role of forests and the imperative to define, map and protect mature and old growth forests. Protecting our forests is the most effective and readily available measure we can take to address the climate crisis. Unlike unproven and exceptionally expensive technological approaches to industrial CCS, protecting forests is well proven and essentially free of cost. Forest protection is critical not only for carbon sequestration but also to maintaining our freshwater resources and providing critical habitat for our dwindling biodiversity, among other life-supports that we cannot live without. Healthy older forests create cooler and moister environments that are more resistant and resilient to wildfires. For all of these reasons, we need to embrace a new approach to forests, as essential elements of our life-support systems, not just a resource to be extracted and used up.

We support the goal of defining and mapping mature and old growth forests, and concur with independent scientists who advise using a cutoff of 80 years of age.

Forest stands 80 years or older must be protected from all logging. Those protections must be solid, reliable, immutable and capable of withstanding pressures to reverse them from potential future administrations and powerful well-funded logging industry lobbyists.

We believe a category of "maturing" forests should be extended to those stands with trees 50 years or older. This makes sense because of the very short time frame we have for addressing climate change. We cannot afford to set the clock back on 50 years of carbon sequestration, much less 80 years worth. The climate crisis requires us to take bold and effective actions now.

Studies have shown that emissions from logging are about 5 times greater than emissions resulting from wildfires, insect infestations and storms combined (1). Protecting forests therefore means prohibiting logging. Any rule-making intended to protect mature and old growth forests must specifically prohibit logging without embracing false rhetoric such as the claim that cutting old trees can be somehow compensated by planting new trees as "net" sequestration. Planting trees is simply not a viable alternative to allowing the regeneration and unimpeded maturation of complex, diverse, natural forests.

Rulemaking to protect mature and old growth forests should be considered only a first step, not an end goal. Defining and mapping mature, old growth, and, we hope also, maturing forests, and putting in place rules that will reliably protect them is a vitally important step - but must not result in opening the floodgates to logging on all the rest of our younger forested lands. Those lands also deserve far better stewardship, and can contribute very significantly to addressing our climate, biodiversity and water crises. Implementation of better practices for stewardship, even for these younger forests is critical.

Current policies support logging to meet ever increasing and unsustainable demand for wood and profit-making for logging and wood product industries. Unsustainable demand for wood underlies the push to support more thinning, under misguided guise of wildfire prevention. Unsustainable demand underlies the push to do salvage logging following disturbances from fire or pest infestations. Demand for wood - for paper, packaging, bioenergy, pallets and more is increasingly represented as a "green" alternative to other materials or practices - while failing to recognize the real and dire impacts of forest degradation and deforestation.

If we are to protect forests and allow them to grow old and provide their life-supporting services, we must rein in the demand for wood, not expand it under the false representation that has been promulgated by industry interests. Of crucial importance- biomass burning must not be subsidized as renewable energy. Doing so

creates a perverse incentive to escalate logging dramatically as funding for renewable energy increases.

We appreciate the opportunity to weigh in on the future of forest policy - we admonish you to take bold steps to protect old growth and maturing forests as a starting point, with the ultimate goal of protecting and limiting the destruction caused by logging on all forested lands under federal stewardship.

We believe a good faith gesture, namely calling off logging in areas already in current sales until this crucially important process of definition, mapping and rulemaking is completed, would be appropriate and indeed essential.

1) Harris, N.L., Hagen, S.C., Saatchi, S.S. et al. Attribution of net carbon change by disturbance type across forest lands of the conterminous United States. *Carbon Balance Manage* 11, 24 (2016).

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