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First name: William

Last name: Gray

Organization: HRB of S OR

Title:

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) 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. And old growth forests have unique and critical importance as wildlife habitat. The Northern Spotted Owl and Marbled Murrelet are but a couple of the many species of many different life forms that rely on old growth for preferred habitat, if not for their very survival. It is critical that you fulfill the President's directive to provide lasting protections for these trees, and by extension, for these species and communities.

I have spent my entire adult life living and working in and around public forests. My home property abuts public mature and old growth stands. I have worked for several decades in these forests, performing surveys for Spotted Owls, Murrelets, other wildlife, and rare plant species. I am acutely aware of just how tenuous a grasp on survival the Spotted Owl currently holds. I have seen countless thousands of acres of beautiful, ecologically important old growth mowed down by the industrial forestry model. This included my own property, BEFORE I was able to purchase it and begin the long hard work of re-establishing a healthy functioning forest ecosystem. (That was 37 years ago that my land was logged, and it is not NEARLY to the point of having good fire resilience yet. My work continues.)

And two years ago, I came far too close for comfort to seeing my own home destroyed by wildfire. Specifically, it was the 150,000+ acre Slater Fire of September 2020 that nearly eliminated my small rural community of Takilma, and came within 1/4 mile of my home. I believe one important factor that saved our community was the high density of mature and old growth forests in close proximity. We have battled the federal agencies for decades to keep our local older forests intact, and had we allowed those timber sales to be conducted in our midst, I am confident our watershed would have been even more heavily impacted than it was during the recent fire.

And yet, in spite of how relatively resilient older trees and stands are in the face of wildfire, the alarmingly high intensity fires of this modern era are capable of destroying even these older stands. Witness the enormous Biscuit Fire of 2002, and the aforementioned Slater Fire (and many others), that eliminated many acres of old forests, just roaring up into the canopies and tearing along through them from one tree to the next, bypassing that thick, fire-resistant bark that characterizes older tree trunks. This is a reminder that we need to be actually creating MORE, much more, old growth, to replace that which is destroyed by wildfires and other disturbances.

For the purpose of protecting these climate-critical forests from logging, 'mature' should be defined as trees 80 years and older. Using an 80 year definition framework would capture the most fire resistant trees and carbon storing forests. And preserving the mature stands will help to fill the "pipeline" for creation of additional old growth stands over time.

I am concerned, and have been for many years, about the numerous logging projects across the PNW that target mature and old-growth trees. These forests collectively contain the bulk of the carbon already stored in federal forests and they continue to sequester carbon at high rates.

Logging of these older stands MUST STOP. NOW. Any exceptions that allow logging of trees over 80 years must be scientifically defensible, while protecting biodiversity values and encouraging management that restores

older forest character.

In summary, I 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.