

Data Submitted (UTC 11): 8/29/2022 2:22:05 PM

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Comments: Monday, August 29, 2022

Subject: Old Forests Are Worth More Standing. Protect Old-growth and mature forests. -- Request for information on federal old growth and mature forests (Executive Order 14072) #NP-3239

To Secretary of Agriculture Secretary Vilsack, Secretary of the Interior Haaland, USFS Chief Moore, BLM Director Stone-Manning, and USFS Assistant Director of Ecosystem Management Coordination Barbour:

Thank you for taking the next steps to advance President Biden's Executive Order (Strengthening the Nation's Forests, Communities, and Local Economies) to fulfill the President's directive to provide lasting protection for mature and old-growth forests and trees on federal lands, and to make progress toward the President's goal to protect 30% of lands by the year 2030. 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. Communities throughout the nation 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.

I strongly urge the U.S. Forest Service and Bureau of Land Management to:

- * Adopt a rule that ensures that old-growth and mature forest protections will endure through time.
- * Protect old and mature trees from logging.
- * Start now by halting old-growth logging projects that are in development.

To achieve meaningful protections, it is essential to adopt a definition of "mature" that truly encompasses all mature trees. I urge you to define mature trees as all trees 80 years and older. Using that definition as a benchmark would protect our most climate and carbon-critical forests, and only in rare and exceptional circumstances should logging of these giants be allowed. These forests collectively contain the bulk of the carbon already stored in federal forests and they continue to sequester carbon at high rates. These trees also provide vital wildlife habitats, clean air, clean water, and resilience against floods and droughts.

Old-growth and mature trees in federal forests are crucial for combatting the climate crisis, as 35 million metric tons of carbon is sequestered from the atmosphere by federal forestlands and 17.2 billion metric tons of carbon is stored in US federal forests. Research indicates that logging of federal forests is a substantial source of carbon dioxide emissions to the atmosphere that is at least comparable to levels associated with wildfires.

Critically, a broad definition that protects mature forests and trees today will provide the foundation to restore and recover mature and old-growth forest ecosystems which have largely been lost to logging across the landscape. Such an approach will better ensure that there is enough redundancy in the definition of mature and old-growth forest to allow for natural disturbances and subsequent losses over time under climate change. We are already seeing the impacts of a warming climate and it is critically important to create a meaningful rule that can be easily implemented across the landscape to protect the most high-value climate forests.

Importantly, the inventory should recognize the role of mature and old-growth trees that have succumbed to ecological disturbances, such as fire, insects or disease. Post-disturbance logging is a principal threat to the entire seral development of mature and old-growth forests. When trees die, they become the building blocks - biological legacies - for forests to replenish and soils to further develop.

This definition framework is a great first step, but I urge you to move quickly to a rulemaking to provide durable protections from logging, especially as there are old-growth and mature trees currently at risk of being cut down—an action that is truly irreparable. 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. However, 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 on-going logging as a threat to older federal forests and trees. Disappointingly, federal agencies routinely target these trees for logging, which emits decades of stored carbon and worsens the climate crisis. Scientific research shows that logging federal forests is a major source of carbon dioxide emissions—maybe even greater than wildfires. There are numerous logging projects across the nation 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. This rule can easily protect mature and old-growth trees from logging, while allowing ecologically appropriate restoration and fire mitigation.

I was dismayed to read a recent USDA Secretarial Memorandum that inaccurately stated, "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 is untrue. There are numerous examples of logging projects across the country that target mature and old-growth forests for timber production in the name of "restoration," "hazardous fuels reduction," and "wildfire mitigation." Logging mature and old-growth federal forests is a destructive activity that must be stopped—and it's entirely within the power of federal land-management agencies to do so.

Scientists agree that logging older, large, fire-resistant trees does not mitigate wildfire risk. Older trees generally are more resistant to fire than younger trees because of their size and thicker bark. Old forests with fire resistant trees can also help buffer communities from extreme wildfires. Even after a fire, they retain most of their carbon. Federal funding has significantly increased for forest thinning, including commercial logging. Therefore, a rulemaking to protect mature and old-growth forests and trees is more urgently needed than ever. 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.

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 of 80 years, and to permanently end the avoidable loss of their critically important carbon, water, and wildlife values to logging. 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 opportunity for robust public engagement and environmental review, it is critical for federal agencies to initiate a rule-making process as soon as possible.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
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