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Comments: Dear Secretary Vilsack and Secretary Haaland,

Firstly, I would like to 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 climate change continues to damage our natural resources and threaten the stability of our planet, 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. As with many western states, communities throughout the Pacific Northwest (PNW) are threatened by climate-driven wildfires. However, protecting our oldest, biggest trees that are most resistant to wildfire, can simultaneously ensure greater community safety and protection while have longer term benefits in carbon sequestration and climate change mitigation. It is critical that you fulfill the President's directive to provide lasting protections for these trees.

While Executive Order 14072 correctly lists the many threats that climate change-enhanced drought and disturbances pose to mature and old-growth forests, it currently fails to include on-going logging as a threat to older federal forests and trees. There are numerous logging projects across the PNW 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. Additionally, scientific evidence continues to show that logged forests are more vulnerable to wildfire impact's for decades following harvest as shrubs and other small vegetative fuels take the place of previously fire resistant large trees. This sets up a pernicious feedback loop wherein degraded landscapes make themselves more vulnerable to fire, and become more degraded over time and fire intensity increases in areas invaded by annual grasses and non-forest vegetation types, subsequently shrinking the natural fire return intervals.

For the purpose of protecting these climate-critical forests from logging, 'mature' should be defined as trees 80 years old or older. Many forests in the Pacific Northwest are fire prone, and we know that wildfire potential will increase with climate change and accompanying drought. 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. Wildfire mitigation actions are significantly more beneficial and cost effective when directing efforts to resources immediately surrounding human developments rather than remote locations far from communities. The Forest Service needs to better align management activities to only allow exceptions for logging trees over 80 years that are scientifically defensible and protect biodiversity values, while specifically encouraging management that restores older forest character at scale.

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. Such an approach will better ensure that there is enough redundancy in the definition of mature and old-forest 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, particularly in the Pacific Northwest, are the most cost effective and useful climate change mitigation tools we have at our disposal. 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.