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Comments: Thank you for providing the opportunity to offer input on President Biden's Executive Order, 14072, "Strengthening the Nation's Forests, Communities, and Local Economies." Protecting our remaining mature and old-growth forests and trees from logging and development on federal public lands represents one of the simplest and most cost-effective climate policies the U.S. can deploy. Literally nothing needs to be done on-the-ground and no money spent (except on the effort to map them). We simply need to restrain ourselves from any cutting and/or removal of mature and old forests/trees from these areas.

The mature and old-growth trees on our federally managed lands are one of this country's greatest resources: these forests protect our drinking water, provide critical habitat for wildlife, prevent erosion and flooding, and, by sequestering and storing large quantities of carbon, are an essential climate solution. There are over 50 million acres of unprotected mature and old growth forests on federal public lands that could be contributing to carbon capture if left unmolested. In 2019, the carbon sequestered in federally managed forests offset approximately 12% of the United States' greenhouse gas emissions. These forests also help ameliorate climate change by providing refugia from heat, absorbing and slowly releasing moisture when it is needed, shading streams, etc. Furthermore, they are integral to religious, cultural, and subsistence practices of Indigenous and other citizens.

I urge the U.S. Department of Agriculture and U.S. Department of the Interior to work together immediately to initiate a rule-making process based on a minimum definition of mature forests and trees of 60 years old and older, (to be adjusted by region, ecosystem and species to capture the age of reproductive maturity for all tree species), in order to permanently end the avoidable loss to logging of their critically important ecosystem, carbon, water, and wildlife values. The definition should also include primary forests that have had no industrial activity but may be composed of younger trees because of natural disturbances such as fire, disease, or insect infestation. These forests still store carbon and provide other important functions.

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 developments 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. It is critical that implementation of this Executive Order prohibit ANY logging within old growth or mature forests, including thinning of younger trees within the stand aimed at "improving" forest structure or "restoration." The primary threat to these forests is logging, plain and simple!

Not only is the threat of logging to mature and old-growth federal forests pressing, it is one that is fully within federal land management agencies' power to address. The rule should incorporate a moratorium on any logging or development of mature and old growth forests, including currently planned timber sales and other logging.

Since local economies are mentioned in the Executive Order, I would also like to point out that healthy forests contribute to the economic well-being of communities by virtue of their ecosystem services (clean water and air, preventing floods and landslides, etc.) as well as reduced healthcare (including mental health) and other social costs, and as a resource to attract tourism.

Above all, it is critical that the definition of mature and old growth forests err on the side of conservatism. If we make a mistake by cutting too many trees, it will take many decades, or even centuries, to replace the ecosystem services-including carbon sequestration-they provide. The definition and guidelines for this endeavor do not

need to be complicated. Common sense and the simple parameters suggested here and by competent and independent scientists are all that are needed to protect this priceless asset.

Sincerely,
Katherine Johnson, DVM