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To: Forest Service, Agriculture (USDA); Bureau of Land Management, Interior (DOI)

Comments in response to Request for Information (RFI) on Federal Old Growth and Mature Forests (Executive Order 14072) #NP-3239

Submitted by Josephine Koehne for Treekeepers of Washington County (Oregon)

We will comment on the following topics requested in the RTF:

- to define old-growth and mature forests on Federal lands;
- coordinate conservation and wildfire risk reduction activities;
- identify threats to mature and old-growth forests;
- develop policies to address threats; and
- develop recommendations for community-led local and regional economic development opportunities.

Thank you for this opportunity to provide public comment. I am representing a new organization formed solely for the purpose of saving existing mature trees in Washington County, Oregon. We track forest policy at the state level (Land Conservation and Development, the Board of Forestry, the Oregon Department of Forestry, and all Oregon bills related to forestry proposed and adopted by Oregon State Legislature), as well as all major federal policies. We also follow the research on climate and forestry, wildfire and the wood products industry.

We are thrilled that the IRA has passed with its many recommendations to address the climate emergency, but we have grave concerns regarding the omissions in forestry proposals under consideration in EO 14072.

Unless there are clear and unambiguous definitions for "mature" and "old growth" and the "protections" for them both are spelled out without any possibility for misinterpretation, we will surely miss our short window of 8-10 years to meet our US Greenhouse gas emissions goals, and with them our opportunity to save the planet from rapid ecological disaster and the social chaos that will surely accompany it.

What the executive order fails to mention is the impact of logging on carbon emissions. Logging operations that allow for the harvesting of both mature and old growth trees were not even mentioned as a large source of carbon dioxide emissions. Protecting these trees from pests and wildfires caused by climate is dwarfed in comparison to the impact of harvesting mature and old growth trees for short-lived wood products that will soon decompose and add to our atmospheric carbon problem. The impact of clear-cut logging destroys the benefit of carbon sequestration that growing trees provide, and it takes many decades for young trees to catch up. Logging compacts and bakes the soil by killing the fragile mycelium, reducing soil fertility. It also contributes to run-off and stream sedimentation and reduces the capacity of water retention for future drinking water, not to mention destroying wildlife habitat and the many other ecological services mature forests supply. Allowing logging in these forests for the enrichment of a handful of fully-automated industrial timber companies that provide so few jobs is unconscionable, especially when the future of the planet is at stake. The value of these trees left standing

far outweighs the very small and insignificant financial benefit for those few operators for a small supply of particleboard. Trees left standing for many years are a cost-free mechanism to reduce CO2 and air pollution from the planet, and mature trees are more resilient to wildfire and drought conditions compared to young trees.

We suggest immediate national rule-making with clear definitions for mature trees (80 years and over) and old growth (at over 21 inches DBH). These trees must be specifically protected from logging. Clear guidelines are needed for "thinning", "selective thinning" and "patch harvesting" which are far better approaches to timber harvesting than "clear cutting" and "fuels reduction" which has been shown to be ineffective when drought and high winds can spread embers for great distances. Far better to employ loggers on the ground to thin stands, and to leave the duff on the ground to enrich the soil. If it burns, large mature trees will not suffer and many forms of wildlife will benefit from these newly burnt over areas. Fuels reduction is a false solution. Far better to use those funds for hardening homes against wildfire and improving building codes to fire code standards.

We are drawing from the scientific literature on carbon, wildfire, climate and old growth research (Dr. Beverly Law, TW Hudiburg, DA Dellasala, DB Lindenmayer, among many others).

We hope you will consider our comments when designing federal forest policy where a high percentage of mature and old growth are to be found. Please protect these trees and save us from destroying life on earth.