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Comments: Thank you for advancing President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. And thank you for this opportunity to comment on the rulemaking process and provide my opinions.

I believe that it is critical to protect ALL our mature trees and remaining old-growth forests. There is far too little old growth remaining, unfortunately. Past errors of overharvesting must be atoned for with effective and strong regulations to protect what remains. Now we know the importance of mature forests for biodiversity, the survival of endangered species, and towards our fight against climate change. Please ensure that the outcome of this exercise will be the true protection of our forests.

I have been a strong and enthusiastic supporter of President Clinton's National Forest Roadless Area Conservation rule since I provided public comments during its rulemaking process. It was truly a wise decision by President Clinton to promulgate the Rule, and its survival after over twenty years of opposition from special interests is enheartening. I believe that these 58 million acres protected under the Roadless Rule should be automatically protected by this year's rulemaking.

In addition, all roadless areas must be protected without exception. I believe that Colorado National Forests and parts of the Tongass NF have been removed from the Roadless Rule protections for political reasons. These forests must be returned to full protection under this new Rule.

With regard to identifying what lands are eligible for protection under this process, I also believe that ALL the inventoried RARE II roadless areas must be protected, regardless of how small or isolated they may be. If I am not mistaken, the Roadless Rule promulgated by the Clinton Administration protected a subset of the RARE II inventoried lands. I believe strongly that all our remaining mature and old-growth forests should be protected. There should be no artificial barriers to the protection, such as an arbitrary minimum acreage eliminating protections of certain mature and old-growth forest lands.

To protect climate-critical forests from logging, "mature" forests and trees should be defined as 80 years old. Only in rare circumstances should the logging of these giants, which store massive amounts of carbon, be permitted. I am sick of the continued destruction of our old forests simply for the private profits of the lumber industry. We should stop the continued destruction of the public forests that belong to all Americans. The timber industry has had free rein in our National Forests for far too long, and we now understand the value of our forests is much greater than the price of lumber.

I believe that scientific analysis must guide all decision-making undertaken as part of this rule-making process. You must let peer-reviewed science guide the decisions on what constitutes old growth and mature forests, as well as in the selection of the lands that will be protected under the Biden regulations. No politics. No favors to industry. No special interests preempting scientific analysis. Let science be the guide.

Mature forests and trees 80 years and older in age contain the bulk of the carbon stored in federal forests and continue to sequester carbon at high rates. They also provide vital habitats for endangered species and protect important sources of our drinking water. Safeguarding mature forests and trees now will help recover old-growth ecosystems across the country that have largely been lost to logging.

President Biden's Earth Day Executive Order recognized the critical role mature and old-growth forests play as a climate solution, but 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.

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 absolutely not true. It misrepresents the reality of how restoration and hazardous fuel thinning projects are designed and implemented. 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." The targeting of mature trees in these projects is nothing more than a favor to industry and is not supported by science. It is the younger, smaller trees and shrubby undergrowth that must be the target of fuel reduction projects if they are to be effective in making our forests safe from catastrophic wildfires. I would expect this rulemaking to clearly prohibit the continuation of these practices

With the wildfire situation as it is in recent years the amount of federal funding has significantly increased for forest thinning, but the managing agencies have been lax in their design and management of these projects, to the detriment of both the forests as well as the safety of the citizens living within these forests. Scientists agree that logging older, large, fire-resistant trees does not mitigate wildfire risk. Older trees are more fire-resistant than younger trees because of their size and thicker bark. Even after a fire, they retain most of their carbon. Therefore, regulations to strictly and effectively protect mature trees (80 years and older) and old-growth forests from fuel reduction projects are urgently needed today.

I believe that the Biden administration should seize this opportunity to truly and effectively protect our mature forests through binding regulations that will endure in future administrations, similar to the Clinton-era Roadless Rule. I urge you to move quickly on this.