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Comments: It is critically important right now to protect mature and old forests, those over 80 years old, in order to protect our climate! The decisions we make in this country reverberate around the world, and we have a duty to humanity to help protect our climate and our forests for the sake of global humanity and the livability of life on earth.

We should be focused on thinning plantations and small diameter trees only near homes and communities, and we should protect our mature and old forests for global climate resilience.

As someone who lives within a National Forest inholding within the Rogue River-Siskiyou National Forest, in the Applegate River watershed. I have lived through many wildfires, and it's the large, old trees that can survive low to moderate severity fire, and will provide us with the carbon storage we need for the future.

As the climate warms, trees that have survived in places for millennia can no longer survive in some locations, and tree mortality is at an all-time high in many areas, even drought tolerant pine trees growing in open stands. Why would we exacerbate the tree mortality that is occurring from climate change by cutting even more trees? The Forest Service needs to stop logging our mature and old forests before you shoot us all in our collective feet!

I have seen the Rogue River-Siskiyou National Forest and Klamath National Forest log old growth trees during so-called "fuel reduction" or "forest restoration" projects. This old growth logging is a step in the wrong direction and does nothing for fuels or restoration. We need to protect mature trees and focus on thinning and restoring the millions of acres of plantations from old clearcuts, that could someday be more carbon sinks and storage for climate resilience.

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 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 and it is critical that you fulfill the President's directive to provide lasting protections for these trees.

For the purpose of protecting these climate-critical trees and forests from logging, "mature" should be defined as 80 years and older. By setting logging limits using this definition, federal agencies will establish a safety net that assures minimum protection of the ecological and carbon benefits these older forest elements provide for future generations. These older forests and big trees collectively contain the bulk of the carbon already stored in federal forests and they continue to sequester carbon at high rates far into the future. They also provide, across forest types, vital habitat and biodiversity benefits, and important sources of drinking water for communities. Critically, protecting mature forests and trees today will provide the foundation to recover old-growth ecosystems which have largely been lost to logging across the landscape.

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. If continued logging of these trees is allowed, the very values that let them play a vital role will be eliminated. Losing more of our mature & old-growth trees and forests to logging will only make the climate crisis worse: Scientific research indicates that logging of federal forests is a major source of carbon dioxide emissions to the atmosphere that is at least comparable to, and probably greater than, levels associated with wildfires.

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 projects 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. Not only is the threat of logging to mature and old-growth federal forests pressing, but it is also one that is entirely within federal land management agencies' power to address. Such a rule can be readily structured to leave room for ecologically appropriate risk reduction of uncharacteristic wildfire, which is very largely driven by small trees and brush, not big, fire-resistant trees that have survived for generations.

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 the opportunity for robust public engagement and environmental review, it is critical for federal agencies to initiate a rule-making process as soon as possible.

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 as 80 years and older, to permanently end the avoidable loss of their critically important carbon, water, and wildlife values to logging.

Sincerely,  
Suzie Savoie  
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