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Comments: Vermonters for a Clean Environment supports President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies. Protecting our mature and old-growth forests and trees on federal lands represents one of the simplest and most cost-effective environmental policies the U.S. can deploy at scale. Water and biodiversity crises are growing exponentially worse. It is critically important to change the paradigm around public lands management to provide lasting protections for public forests.

We understand the purpose of this comment period is to assist the USFS in determining the appropriate definition of "mature" forests. "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 provide, across forest types, vital habitat and biodiversity benefits, and important sources of water for human and natural 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.

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.

If the Biden administration is to do all it can 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.