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RE: Executive Order 14072 #NP-3239

Dear Secretary Vilsack and Secretary Haaland,

Thank you for taking comment on President Biden's Executive Order on Strengthening the Nation's Forests, (14072 #NP-3239) Communities, and Local Economies. Forests across the United States provide opportunities for outdoor recreation, habitat for native wildlife and plants, and jobs in both the outdoor recreation and sustainable forestry sectors. Preserving and protecting old-growth forests is a simple and cost-effective strategy to sequester carbon; this will only become more important as the climate crisis intensifies.

National forests in the Northwest are some of the most carbon-dense in the world - they store more carbon per acre than even the Amazon rainforest. In addition to being stored in the trees, carbon is stored in soil organic carbon in healthy old-growth forests. As soil, on a global scale, contains more carbon than the atmosphere and all vegetation combined, protection of forests must include practices to ensure soil health and carbon sequestration.

As climate change intensifies, simply preserving mature forests, even if the trees themselves may be old, is not enough. Particularly in the mountain west, forest practices such as thinning and prescribed burning will be necessary to mitigate the risk of catastrophic wildfires that can destroy old-growth forests. Given that climate change is leading to longer, hotter, drier summers, once burned, these forests may never have the chance to return to an old-growth state, even if they are fully set aside for protection. Thus, active management to reduce the risk of catastrophic wildfires will be vital to ensuring that our forests remain a carbon sink, rather than a source.

Currently, mature forests in the Pacific Northwest are defined as those containing trees 80 years or older. This definition is incredibly simplistic - for instance, forests on Cougar Mountain, within the Issaquah Alps that our organization advocates for, technically qualify as mature forests, as they contain mostly broadleaf trees (bigleaf maple and red alder) over 80 years old. However, true old-growth forests in our area are primarily composed of conifers, which have a much longer lifespan. Now, county foresters are using active management techniques like gap treatment to remove some of the broadleaf trees that are reaching the end of their lifespan, and planting conifer saplings. Over time, this will result in greater carbon sequestration in the forest, habitat for greater biodiversity, and forests that are more resilient to climate change. Similar active management techniques may need to be taken in other forests to encourage the development of healthy old-growth forests.

Old-growth forests are not defined simply by the presence of old trees. Myriad other factors, including the mix of tree species, tree spacing, micro-habitats formed by dead trees, soil microbiota, and more are critical to the ecosystem function of old-growth forests. In addition to setting aside federal lands containing old growth trees for preservation, the administration should work with Tribal governments, scientists, and local agencies to determine and apply best practices for ensuring that forests containing older trees have all of the factors that define a mature and healthy forest.

We urge the US Department of Agriculture and US Department of Interior to take a holistic view of forest health, and use the best available science, expertise, and traditional ecological knowledge to not only preserve forests, but also to ensure that they retain their rich biodiversity, sequester carbon, and are resilient to a changing

climate.

Sincerely,

Paul Winterstein  
Executive Director  
Issaquah Alps Trails Club