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Comments: Dear Secretary Vilsack and Secretary Haaland,

I am submitting these comments on behalf of Blue Mountains Biodiversity Project (BMBP). BMBP is a non-profit that has been working to protect and restore the ecosystems of the Blue Mountains and Eastern Oregon Cascades since 1991. President Biden's Executive Order on Strengthening the Nation's Forests, Communities, and Local Economies is a step in the right direction, but we urge you to take timely action to implement concrete rules for protecting US forests. In particular, we encourage you to protect mature and old growth trees from their biggest current threat: logging.

The Executive Order (EO) mentions catastrophic wildfires, insect infestation, and disease as threats to mature and old growth trees in the US, but does not mention logging, a far greater threat to those forests and the biodiversity they sustain and carbon they sequester [1]. Scientific research indicates that logging--in addition to releasing the carbon held in forests--is itself a major source of carbon dioxide emissions to the atmosphere [2] [3]. The surest and most cost effective way to reach the goals outlined in section 2 of the Executive Order is to leave mature and old growth trees standing.

Trees show mature and old growth characteristics at around 50 years old or even younger, far before they are often defined as mature and old growth. We know that without specific, concrete rules in place, many mature and old growth forests will still be logged, taking advantage of loopholes and vague guidance. We are asking you to implement a moratorium on logging trees 50 years old and older. These trees contain the vast majority of the carbon stored in forests on federal lands (the rate of carbon accumulation increases as tree size increases). Whether burned or not, they also provide vital habitat for animals and drinking water for communities. Protecting older trees is necessary but not enough; mature trees 50 years old and older will soon become old growth and provide the many benefits associated with them.

Here in Eastern Oregon and southwestern Washington, we have seen the recent loosening of protections for trees over 21" used to log some of the last remaining old growth in the region. These protections were part of the rules known as the Eastside Screens, first put into place in the 1990s, and were rolled back during the last days of the Trump administration. A federal rule could protect these important trees, which are now at great risk. In our region in Eastern Oregon, the size of trees is particularly important for wildlife habitat, water quality, and other ecosystem services. Although large trees are a mere 2 to 3.7% of the trees in the region, they store 33 to 46% of the total above ground carbon stored in the area [4].

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. In Eastern Oregon, these projects include the Austin and Cliff Knox projects in the Malheur National Forest; the Mill Creek Dry Forest Restoration Project in the Ochoco National Forest; the Morgan Nesbit Forest Resiliency Project in the Wallowa-Whitman National Forest; the South Warner Habitat Restoration Project in the Fremont-Winema National Forest; and more. There is a growing body of scientific evidence that mature and old growth forests are more resilient to wildfires than younger, previously logged forests [5]. There is no reason for these trees to be logged in the name of wildfire mitigation. Removing them and planting new, young trees is only providing tinder for wildfires sweeping through newly dry and exposed soils, where moist and hardy old growth forests once stood. Re-planting has not been shown to have the same benefits as leaving forests standing, or allowing them to regrow naturally without

intervention [6] [7].

An immediate moratorium on logging of mature and old growth trees should be implemented on federal lands. Logging should include any euphemisms used by the agencies to authorize the cutting and removing of trees, e.g. thinning, clearcutting, shelterwood cut, group selection, fuel break, restoration, reforestation, fire risk reduction, hazardous fuels reduction, etc.

We hope that some of the language used in the EO is clarified in future rules as well. For example, what does "conserve" mean in this context? What is meant by "resilience?" Forests in this region have experienced fires of varying intensities for centuries and continue to thrive in tandem with them. A resilient forest is not necessarily a heavily managed forest, with only very low-intensity fires. Particularly when these wildlands are far from communities, it does not make sense to log them in order to "conserve" them or promote "resilience" in the face of naturally-occurring fires. The wildfire mitigation strategies being encouraged should be more clearly defined—we know that home hardening and other measures focused on protecting communities are more effective in terms of cost and safety than backcountry commercial thinning [8] [9] [10]. Fuels reduction should be limited to smaller trees and debris, not used as a justification to cut large and old trees. The forests mainly need to be protected from logging and other resource extraction/extraction based management. In order to really keep these forests on public lands safe, they need strong protections. Logging is the biggest threat to these forests, and protections against it specifically need to be expanded and strengthened.

These trees are vital carbon sinks and play a huge role in slowing the rate of catastrophic climate change. Biden's Executive Order itself says that "America's forests absorb more than 10 percent of annual United States economy-wide greenhouse gas emissions." They are also important habitat for many species, increasing biodiversity in the areas they are located in. Maintaining not just the oldest and largest trees but entire swaths of forest is vital for so many species right now; we are facing a biodiversity crisis and the more forests are logged, the worse it gets. Additionally, mature and old growth forests are important sources of drinking water for communities. Reforesting with young trees simply does not replicate the benefits of intact old forests.

Section 3 of Biden's Executive Order mentions that "conserving and restoring global forest and peatland ecosystems, particularly in the Amazon, Congo Basin, and Southeast Asia, can provide significant global greenhouse gas emissions mitigation, both by preventing the emissions caused by deforestation and by increasing the amount of carbon dioxide captured from the atmosphere and stored in soils and forest biomass..." This is true, but the benefits of and threats to forests here in the US are much the same. We find the lack of focus on conserving forests here in the US specifically concerning. Deforestation remains a bigger threat to forests in the US than the other threats listed in the EO.

Section 4 of the EO mentions "nature-based solutions" to climate change, including "actions that protect coasts and critical marine ecosystems, reduce flooding, moderate extreme heat, replenish groundwater sources, capture and store carbon dioxide, conserve biodiversity, and improve the productivity of agricultural and forest lands to produce food and fiber." Clearly defining mature and old growth trees, and placing a moratorium on logging them would go a long way towards addressing these goals. "Climate-smart forestry" is mentioned in the EO but not defined. Logging releases carbon, and is not climate-smart. Biomass production also releases carbon, and requires large amounts of existing fossil fuels to move products to markets, and is also not climate-smart. Leaving these trees standing is the only climate-smart approach to their management. Additionally, protecting mature and old growth trees while mapping is undertaken would be an important good-faith gesture, and would ensure that we don't lose any more of these important trees before rules are put into place.

If the Biden administration wants to take lasting action on climate change, these protections must be made through binding regulations that will endure in future administrations, much as the Clinton-era Roadless Rule has done. We hope future rules will reflect the importance of this matter, and not include loopholes that encourage or

allow logging. To ensure a rule can be adopted on the necessary urgent time frame, with opportunity for robust public engagement and environmental review, it is critical for federal agencies to initiate a rule-making process as soon as possible. Pledges are non-binding. We need definitive and actionable rules instead.

At this point in time, the United States is simply not on track to reach the 30x30 agreements made at the G7. There is a lot of work to be done to combat the climate and biodiversity crises in this country; public lands are under threat from all kinds of resource extraction, and with so little left they need firmer and broader protections in place. Even if large and old trees are protected, we will need to do more to ensure that future generations have clean water and livable temperatures. Still, protecting these trees would be a huge step forward, and would go a long way towards reaching the G7 agreements in the next 8 years--a brief window!

The effects of the climate crisis are becoming clearer every year and taking concrete steps to mitigate them is a time-sensitive issue. The threat of logging to the few mature and old-growth federal forests remaining is pressing, and it is entirely within federal land management agencies' power to address. We 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 trees as 50 years or older, to permanently protect them from logging.

Paula Hood and Ella Hackett
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