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First name: James

Last name: McCaffrey

Organization: Partnership for Policy Integrity

Title: New England Legislative Director

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From : Partnership for Policy Integrity

Re: Request for information on federal old growth and mature forests (Executive Order 14072) #NP-3239.

On behalf of Partnership for Policy Integrity (PFPI), a science-based non-profit that utilizes litigation, policy analysis and strategic communications to promote policies that protect climate, ecosystems, and people, we submit the following comments on the Request for information on federal old growth and mature forests (Executive Order 14072) #NP-3239.

While the President's Executive Order acknowledges the importance that forests play in maintaining biodiversity, more can and should be done to make sure that we are preserving, to every extent possible, intact forest ecosystems as our single best tool to fight and mitigate the worst impacts of climate change. This is especially true for significant tracts of mature and old growth stands which remain at risk for commercial logging in the U.S. The executive order is also heavily reliant on language which implies that logging and active "forest management" is an effective and valuable tool in reducing wildfire risk, which science has now shown is not the case.

One of the simplest and most cost-effective climate policies the U.S. can deploy without delay is to protect the remaining mature and old-growth forests and trees from logging and development on federal public lands. Climate science shows that to mitigate catastrophic warming, we must dramatically reduce greenhouse gas emissions over the next eight years and increase uptake of CO₂ that's already in the atmosphere. That is precisely what healthy forests do.

Forests absorb twice as much carbon as they emit, and healthy functioning forests in turn absorb up to twice as much carbon as monoculture or degraded forest ecosystems.[1] When forests are not degraded, they continue to contribute to the regional carbon sink, as recommended by the IPCC.[2] Besides storing vast amounts of carbon, forests also provide important ecosystem functions which will benefit from these protections, providing vital habitat and biodiversity benefits, and serving as important sources to help replenish and purify drinking water supplies at a time when drought and water shortages are worsening.

Fortunately, protecting mature and old growth forests on federal lands requires nothing more than a decision to protect them from logging. However, as the U.S. Department of Agriculture and U.S. Department of the Interior reviews these areas, logging continues unabated, and often under the guise of managing fire risk, restoration, reforestation, or other common programs used by agencies and land managers to justify logging operations. Nearly every logging project currently planned across the country includes mature and/or old-growth trees and stands for removal, including projects described as "restoration," "hazardous fuels reduction," and "wildfire mitigation." But science now demonstrates that logging operations do not stop wildfires, and wildfires that burn through areas that have been logged tend to burn faster and more intensely than when burning through mature and old-growth forests that have been protected from logging.

Research has also shown that in the span of just the last 150 years, more than 8,000 years of forest carbon storage, totaling more than a billion tons of carbon in midwestern forests alone, has been wiped out largely by human activity, including development, fragmentation, and deforestation, much of it from logging. The study showed that Upper Midwest forests "had steadily gained carbon for 8,000 years, almost doubling their storage capacity, before Euro-American settlers began clearing large swaths of forest." [3]

Last November, more than 200 scientists and ecologists cautioned the Biden administration and Congress that logging in U.S. forests emits 723 million tons of uncounted CO₂ into our atmosphere each year-more than 10 times the amount emitted by wildfires and tree mortality from insects combined.[4] The logging industry itself emits an equivalent amount of carbon annually as burning coal in the U.S.[5]

We therefore recommend a full moratorium on logging in all sensitive and ecologically valuable areas until such time as the agencies can complete an inventory of all mature and old growth stands on federally owned lands, with the ultimate goal of permanently protecting these areas. The moratorium should include any logging operations used by the agencies to authorize the cutting and removing of trees, including operations described as thinning, clearcutting, shelterwood cut, group selection, fuel break, restoration, reforestation, fire risk reduction, hazardous fuels reduction, etc.

In areas where logging operations are presently allowed or have already been approved, individual trees and stands of trees that are 50 years old or older should be excluded from cutting and removal, includes trees burned in a fire (whether dead or alive). This will immediately and effectively provide a foundation to recover mature and old-growth ecosystems which have already been decimated by expansive logging across the United States.

Forests remain critical in the health of our planet and efforts to actively "manage" forests while "deploying these tactics with minimal environmental review and in defiance of the precautionary principle are costing billions of dollars annually" while also devastating forest ecosystems across the U.S.[6]

Because time is of the essence, and forests remain one of our single best tools to fight climate change, we urge the U.S. Department of Agriculture and U.S. Department of the Interior to work together without delay to initiate a rule-making process based on a minimum definition of mature forests and trees of 50 years old and older and adjusted by region, ecosystem and species in order to capture the age of reproductive maturity for all tree species, with an ultimate goal of permanently protecting these sensitive areas.

James McCaffrey
New England Legislative Director
Partnership for Policy Integrity

[1] <https://www.sciencedaily.com/releases/2018/10/181004143905.htm>

[2] IPCC Report Climate Change 2022, Impacts, Adaptation, and Vulnerability, February 2022: "[R]educing deforestation and forest degradation rates represents one of the most effective and robust options for climate change mitigation, with large mitigation benefits globally."

[3] <https://www.science.org/doi/10.1126/science.abk3126>

[4] https://johnmuirproject.org/wp-content/uploads/2021/11/ScientistLetterOpposingLoggingProvisionsInBBB_BIF4Nov21.pdf

[5] <https://news.mongabay.com/2021/11/scientists-urge-biden-to-remove-logging-fossil-fuels-biomass-from-budget-bills/>

[6] <https://www.sciencedirect.com/science/article/pii/S0006320722000520>