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Comments: Dear Secretary Haaland and Secretary Vilsack,

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.

The Executive Order 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. 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. The surest and most cost effective way to reach the goals outlined in 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. You should implement an immediate moratorium on logging trees 50 years and older. These trees contain the vast majority of the carbon stored in forests on federal lands, and provide vital habitat for animals and drinking water for communities.

In eastern Washington, we have seen the recent loosening of the Eastside Screens' protections of trees over 21" used to log some of the last remaining old-growth in the region. A federal rule could protect these important trees, which are now at great risk. Although large trees are a mere 2 to 3.7% of the trees in this region, they store 33 to 46% of the total above-ground carbon stored in the area.

If the Biden administration wants to take lasting action on climate change, 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 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.

The threat of logging to the few mature and old-growth trees remaining on federal lands is pressing, and it is entirely within federal land management agencies' power to address. I strongly urge the US Department of Agriculture and US Department of Interior to work together to quickly initiate a rule-making based on a definition of mature trees as 50 years old or older, to permanently protect them from logging.