

Data Submitted (UTC 11): 1/25/2024 3:08:55 PM

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Comments: President Biden, Ms. Harding, Mr. Zaidi, and Chief Moore,

I am extending my appreciation for commencing the process aimed at protecting mature and old-growth (MOG) forests. While recognizing this positive step, I strongly urge immediate action, emphasizing that an executive order from President Biden, which could be signed and issued now, holds the highest potential to establish enduring protections for MOG forests for generations to come. My request, along with those in the scientific community, includes issuing a moratorium on logging within MOG to ensure these forests are protected as the amendment process proceeds to full protections for MOG.

I urge you to implement the following critical measures:

Acknowledgment of the Singular Threat to Forests: Logging

Identify logging as a primary threat to forest carbon storage and biodiversity and address it as the foremost concern. This is the only threat that the Forest Service can effectively cease.

Closure of Logging Loopholes for MOG Forests

The Administration's current proposal includes a glaring loophole for logging under the guises of forest health or fire management, currently used to conduct logging that is degrading the integrity of MOG forests. I request that you eliminate this loophole. While felling of some roadside hazard trees may be permissible for human safety, prioritize preserving felled trees as crucial habitat and stored carbon.

Inclusion of Mature Forests

Include full protection of mature forests from logging, not just old-growth forests, and recognize mature forests as vital components of future old-growth ecosystems. For the Administration's proposal to be truly meaningful, mature forests must not be excluded from protections. The Administration's current proposal leaves out mature forests, which is tantamount to excluding the entire eastern half of the nation, since very little old-growth forest remains in the eastern U.S., due to logging.

Enduring Protection Regardless of Natural Processes

Commit to the enduring protection of designated areas, irrespective of future natural processes like insect outbreak, wildfire, or wind storms. A deep body of science finds that MOG forests most often act as climate and wildfire refugia. When these forests experience natural disturbance processes, including patches of high-intensity fire, the resulting habitat is highly biodiverse and carbon-rich. MOG forests experiencing fire or other natural processes in recent years must be protected from logging, and current MOG forests must be protected permanently, including when future natural processes, like fire, occur.

Full Protection for Tongass Old-growth

Remove the Tongass old-growth logging exemption from any further analysis in the upcoming EIS. Any financial incentive to log old trees on the Tongass conflicts with the conservation directive in EO 14072 and the global biodiversity and carbon importance of the Tongass.

Scientists have extensively documented the climate and biodiversity significance of mature and old-growth (MOG) forests in the continental United States and on the Tongass, offering valuable insights for protections based on the best available science. Moreover, it is important to emphasize that even in the case of large wildfires, they only consume less than 2% of tree carbon. In contrast, thinning operations release a considerably higher amount of carbon into the atmosphere over an equivalent area compared to wildfires.

The evidence is clear: we must cease logging in MOG forests, both before and after natural processes, and refrain from blaming natural processes as a threat to these resilient forests.

I implore this Administration to exercise executive authority promptly, rather than postponing crucial decisions until after the election. The time to act, to protect MOG forests for climate change mitigation and biodiversity conservation, is now. The power is in your hands; I urge meaningful and immediate action based on the wealth of evidence available to make the right decisions for our citizens and the climate.

Thank you.