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Comments: In the wake of increasing climate instability, last December the Biden administration announcement to provide greater protections from logging to old-growth forests on federal lands was reason for celebration because so few old-growth forestlands are left in the United States. In the US, old growth represents a paltry 17% of national forestlands. In California, what is left of coastal old-growth redwoods is 5% of what was here prior to the 1800's. If loggers have free reign to fell what remains, these lost forestlands will take many lifetimes to replace, if, with an increasingly uninhabitable world, replacement is even possible.

Old-growth trees, ranging in age from 100 to over one thousand years old sequester extraordinary amounts of carbon in their leaves, branches, trunks, and roots, safely keeping it out of the atmosphere. As such, old-growth represents a nature-based solution to mitigate climate change. Old growth forests also have the greatest biodiversity, the healthiest soil and the cleanest watersheds and they provide important habitats for a wealth of wildlife from insects to birds to mammals, both large and small, so their preservation combats the mass extinction crisis. They also provide unique recreation opportunities, and they inspire us with their grandeur and beauty.

The administration's laudable plan to limit chainsaws, trucks, and other tree-harvesting infrastructure will make the logging of existing old-growth forests less feasible. What would be even better is an absolute mandate against logging any healthy old growth tree on federal lands under any circumstance.

The policies that follow in the wake of Biden's announcement will be good first baby steps towards a comprehensive, loophole-free plan to rescue and restore our forests. Much more is needed, however. On-the-ground identification of old growth stands would ensure that the plan's components are applied in the appropriate places. Adequate advance notice and clarification about proactive forest management in old growth, what is planned and when will it occur, is a must as is the solicitation of robust engagement by the public and indigenous Tribes to develop local or regional adaptive strategies for old forest conservation. Review of all forest management plans in old growth by independent agencies is critical to ensure that the management is undertaken in environmentally responsible ways and is driven by forest health needs rather than by economic incentives. Adequate resources to support the proposal's monitoring requirements must be available so that the efficacy of the management approaches can be assessed and adapted, as needed, to meet the proposal's goals.

Data transparency must be fostered by publicizing information compiled through the National Old-Growth Monitoring Network, as well as information on vegetation management projects occurring either in old-growth stands or in priority fire sheds under the agency's Wildfire Crisis Strategy.

And, to mitigate climate change more effectively, and better protect the denizens of the forests, we need more than the few remaining old growth stands. We also need to protect millions of acres of what is future old-growth, those forests that are close in age to old-growth but not quite there. These slightly younger "mature" forests are developing the characteristics that will eventually evolve into the complex ecosystem found in an old-growth forest and are they are already providing much of the benefit of old-growth.

Our healthiest older forests are needed now more than ever. They are critical to the health of the planet, our water supplies, biodiversity and soil quality. So much of our fish wildlife relies on them for their survival, as, indeed, do we.

Please USFS, please provide a path forward for old growth, and eventually mature trees. It is time to end the extractive mindset that has characterized the Service since its inception and transform it to an agency that prioritizes the public good and the health of the world that we must all live in. And remember, as the Native American saying goes, the earth is something we borrow from our children.