Data Submitted (UTC 11): 2/1/2024 10:53:27 PM First name: Jennifer Last name: Normoyle Organization: Title:

Comments:

That the President is taking action is commendable because, due to a voracious timber industry, few old-growth stands are even left in the United States. In the US, old-growth represents only 18% of national forests. In the Northeast, once covered with trees prior to colonization, old-growth currently comprises less than 0.5% of woodlands. In the eastern deciduous and mixed forest zone, no region has more than 1.1%, and, in California, what remains of coastal old-growth redwoods is only 4% of what was present prior to the 1800's.

The definition of "old-growth" is controversial but generally means larger, taller trees that are usually at least 120 years old. Characteristics of old-growth include the ability to sequester extraordinary amounts of carbon in their leaves, branches, trunks, and roots. Old-growth forests have the healthiest soil, the cleanest watersheds, and the greatest biodiversity and they provide habitats for a wealth of fish and wildlife. Retention of older trees is one of the best, most cost-effective nature-based solutions available to combat both climate change and the mass extinction crisis. Leaving the trees alone costs nothing and whatever financial loss timber barons and their wall street investors would incur, whatever small number of timber jobs are lost, as a result, is more than offset by the benefits to future generations and the future of the planet. Old-growth forests also provide unique recreation opportunities, support tourist economies, and inspire us with their beauty and grandeur. For many Native Americans, these forests have immense cultural significance. If whatever remains of old growth is logged, what is lost will take lifetimes to replace and, in a world rendered increasingly unlivable by climate change, replacement may not even be possible. Clearly, they deserve protection.

But despite Biden's efforts, logging will likely remain the greatest threat to old-growth in national forests. While the administration is calling for a limitation of chainsaws, trucks, and other tree-harvesting infrastructure, and disallowing economic gain as a primary incentive to cut, loopholes in the plan render the big trees still vulnerable. Logging projects, will be exempted from the new rules if justified by the supposed need for emergency "forest restoration" or "vegetation management" for wildfire risk reduction. Selling the wood for profit will not be prohibited since it is not the primary incentive.

Euphemisms for logging like "restoration" and "vegetation management" have been embraced by the timber industry, timber-backed scientists and timber-backed politicians as part of a narrative perpetuated since destructive wildfires in recent years on the West Coast. It is a narrative that lays the blame for these wildfires on excessive fuel in forests due to a century of fire suppression. The consensus among hundreds of independent scientists, those not receiving funding from the timber industry or the US Forest Service, overwhelmingly contradicts this narrative, however. The real culprit is heat and drought brought on by climate change that is, in turn, caused by fossil fuel use and deforestation. Today's wildfires are driven by dry fuels, extreme heat and high winds, not "overgrown" forests and cutting down large trees deep in forests does not make them healthier, nor does it keep anyone safer from wildfires. Never mind that the urgency assigned to such logging projects exempts them from environmental impact assessments.

The Biden plan also needs to go further than just cutting out such loopholes. To address climate change and protect wildlife more comprehensively, not just the few remaining old-growth stands need preservation. There is also the 45% of national forestland that is the old growth of the future. These slightly younger "mature" forests are developing the characteristics that will eventually evolve into the complex ecosystems found in old-growth and are already providing most of the benefits of old-growth. They should also receive protection.

The planet needs trees now more than ever, especially older and larger ones. Let us all hope Biden's initiative to protect them is genuine, long lasting, and just a first step. Let us hope it represents the beginning of a shift away

from a mindset of endless extraction towards true stewardship of the land that follows the example of indigenous tribes. And let us remember the Native American proverb "We do not inherit the Earth from our ancestors, we borrow it from our children".