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Comments: Re: True Conservation of the remaining ancient old growth forests is Ordered. The many goals and strategies for the other Federal forest are separate from that primary objective.

Dear President Biden and Secretaries Vilsack and Harland:

Thank you for the opportunity to comment on this amendment to implement the President's Executive Order (EO).

### Fire

Vegetation management broadly speaking in old growth must be prohibited. Such intrusions and "management" are the antithesis of old growth forests. Whatever the term --thinning, fuel reduction, forest health, etc. they all involve cutting trees and as such must not be applied in old growth and mature forests. These should be protected from road building and mechanical activities that many consider the means to reduce the threat of fire. We must exercise hubris here. There is nothing on earth like the old growth and mature forests, and they have survived for thousands of years even with fire. The time scale of forests is almost impossible for humans to grasp, and yet we push on and try to manage them. Mostly to our great disappointment. We can't afford to proceed as we always have - influenced by the goals of industry rather than independent biologists, botanists, naturalists, and nature herself.

Old growth is fire adapted, therefore, the need to enter old growth to prevent fire is non-existent. This should be recognized for the excuse it is.... The EO seeks to conserve old growth and mature forests which equates to protecting them from entry by motorized equipment that disturbs the rare qualities of the ancient old growth forests.

### Vagueness

The widespread use of vague terms like "dead and dying" introduce unmeasurable and unenforceable language and as we know that vagueness is often exploited. Likewise, diseased old trees are still old growth providing rare attributes and characteristics, disappearing habitat, and unmatched climate services. These types of terms and phrases must not be applied to old growth or mature forests. Those forests must be afforded the status their biological significance warrants.

"Conserving old-growth and mature forests on Federal lands while supporting and advancing climate-smart forestry and sustainable forest products is critical to protecting these and other ecosystem services provided by those forests." Presidential Executive Order 14072, April 22, 2022

The plain reading of the language of President Biden's Executive Order makes clear that conservation of old growth and mature forests on Federal lands is one directive and the other directive is to advance and support climate-smart forestry and sustainable forestry products for all the other Federal forests. The use of the word "while" means protecting the old growth and mature forests at the same time develop policy for advancing other forestry in the non old growth and mature forests. Furthermore in guidance documents, the federal government states: "The proposed amendment seeks to amend all national forest land management plans to conserve and steward old-growth forest conditions and recruit future old-growth conditions in light of increasing threats due to rapidly changing climate conditions. " This does not say log the old growth forests. On the contrary.

Unfortunately, the public and perhaps some agency folks have conflated the two directives and the result appears to be that they are pursuing the wrong objectives. For example, the agencies seem to be pursuing conservation of old growth and mature forests while logging it. Logging will make the forest weaker, it will allow logging roads to be cut in wherever they are deemed convenient, taking down a lot of old trees in the process, and much more lasting damage. This is not conservation and would thus be in contradiction to the President's EO.

This completely new and erroneous objective -conservation of old growth and mature forests while logging it, is contrary to the EO and may have been wrought through misinterpretation but which definitely undermines the concept of conserving what we have remaining of the biologically and climate neutralizing significance of mature and old growth forests. This - to any reasonable person, runs contrary to the President's intent to save these rare and important forests while attempting to smartly steward the other public Federal forests.

Not only has is misinterpretation undermining the significance of the EO for conserving the last unentered and ancient forests, the logging interests have wasted no time in insisting on exceptions, carve outs, and justifications to go ahead with plans to remove mature and old growth forests on Federal lands despite the clear meaning of the EO.

#### Administrative Revocation is Improper

Unless the agency upholds the clear meaning of the EQ, the effect will be the improper administrative revocation in many respects of the Executive Order - an act which only the President can do.

In addition, the EO states that, ""my Administration has committed to deliver, by 2030, on collective global goals to end natural forest loss and to restore at least an additional 200 million hectares of forests and other ecosystems, while showcasing new economic models that reflect the services provided by critical ecosystems around the world. ""

This language reinforces the interpretation that forest loss is to be avoided as opposed to permitted through exceptions, carve outs, plans, or strategies. The EO was indisputably issued to change our approach to logging Federal public lands not perpetuate the old extractive model.

Protecting old growth and mature forests does not translate into protecting just these types of trees. Please visit Headwaters Forest in N. California. Headwaters is the definition of an old growth forest. It is not improved or made more resilient by logging roads, thinning prescriptions, or fire prescriptions. It is roadless, with ancient enormous trees standing and decomposing on the floor, where very deep and spongy duff has protected it from many threats. These rare undisturbed forests make beneficial weather and rain. Plant, animal, amphibian, avian, and insect diversity, and pure water and moisture characterize this complex and mature forest.

#### Subjectivity is Not Warranted

As we all know, vague and subjective terminology will result in a meaningless rule. The EO seeks clear protections and conservation, not built in subjectivity or justifications for even more forest and tree removal. To place human subjective opinions over the abilities of a natural system to survive and evolve even through a fire would be extremely improvident and improper.

To resolve this challenge, there must be quantitative standards and independent scientific findings, accurate

maps publicly available, avenues for authoritative independent review of all proposals to log on federal lands so mistakes, exceptions, influence, and economics are properly weighed.

For example, old growth and mature forests must not be measured by vague considerations of dying or disease. These are not appropriate measures, even if they were actually measured, for a naturally evolving forest. The subjective determinations or even technical opinions of some who might conclude that old growth or mature forests are dying or might exhibit a disease as reasons to cut them down, should be considered to be looking too narrowly at a complex natural system existing in a time frame we humans may not be able to fully understand. Rather than a cause to log these forests, these attributes are part of a forest's natural resilience. Fire benefits forests again on their time table. In a schizophrenic argument, modern foresters often say fire suppression has caused fires to be really bad and then say they need to do more fire suppression activities like thinning and vegetation management. This contorted "logic" should be seen for what it is, logging to save the forest mythology that benefits logging interests.

In conclusion, thank you for your important work. The President ordered conservation of mature and old growth forests. Federal agencies are bound to carry out that Order which supersedes previous legislation and Orders. I support those efforts.

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