

August 30th, 2022

Secretary Tom Vilsack
United States Department of Agriculture
1400 Independence Avenue, SW
Washington, D.C. 20250

Secretary Deb Haaland
United States Department of the Interior
1849 C Street, NW
Washington, D.C. 20240

Secretary Vilsack and Secretary Haaland,

We are writing on behalf of our millions of members and supporters across the country to comment specifically on how you should define—and manage— mature and old-growth trees and forests to provide the greatest climate, biodiversity, and drinking water benefits for the United States.

President Biden correctly identified these forests as critical to climate and biodiversity crises in Executive Order 14072. As these crises continue to have far-reaching impacts on communities across the country, it is essential the Biden administration do everything it can to address them. The United States has to take additional action to reduce climate pollution and position itself as an international leader in climate action if we all are to be spared the worst consequences of global warming.

Conserving mature and old-growth forests on Forest Service and Bureau of Land Management lands offers one of the most straightforward, cost-effective ways to protect existing carbon stores while allowing these forests and trees to continue to pull vast amounts of carbon from the atmosphere — an essential climate strategy that scientists recognize must be implemented alongside cutting greenhouse gas emissions. Several scientific studies demonstrate that logging generates as much, and likely more, climate pollution than forest fires, while also degrading drinking watersheds and essential wildlife habitat. This threat must be addressed as part of any durable policy to protect mature and old-growth forests. As demonstrated by numerous projects across the country, mature and old-growth forests are still being logged for timber production, and require additional protections.

For purposes of addressing the climate and biodiversity threats posed by logging, we recommend that you define old-growth and mature forests to include all stands and trees 80 years or older. These collectively contain the bulk of the carbon already stored in federal forests, and they continue to sequester carbon at high rates. They also provide, across forest types, vital habitat and biodiversity benefits. And they are the building blocks for recovering much-needed old-growth ecosystems across the country.

A rule protecting these forests and trees can be readily structured to leave room for ecologically appropriate management that addresses fire and other non-commercial objectives, in particular because older, larger trees are more resistant to wildfires.

As the Biden administration looks to show international leadership and make a lasting difference, these changes must be memorialized in binding regulations that will endure in future administrations, much as the 2001 Roadless Rule has done. To ensure a rule can be adopted on the necessary urgent time frame, with time for robust public engagement and environmental review, it is critical for your agencies to initiate a rule-making process quickly.

In summary, we urge you, for purposes of permanently ending logging threats to the climate and biodiversity values of federal forests, to adopt a definition of “mature and old-growth” that includes all forests and trees older than 80 years. It is critical that your agencies move quickly to propose a rule that would protect these trees and forests from logging, with whatever exceptions can be shown to be necessary to preserve their values, allow for necessary wildlife management, honor government commitments, and safeguard the public.

Sincerely,

350 Eugene
350 PDX
350 Salem OR
350 Seattle
350 Wenatchee
Alaska Wilderness League
Bark
Battle Creek Alliance & Defiance Canyon
Raptor Rescue
California Environmental Voters
California Wilderness Coalition (CalWild)
Cascadia Climate Action Now
Cascadia Wildlands
Center for Biological Diversity
Central Oregon LandWatch
Climate Reality, Baltimore Chapter
Climate Reality, Portland Chapter
Coalition to Protect America's National
Parks
Coast Range Association
Conservation Lands Foundation
Cottonwood Environmental Law Center
Creation Justice Ministries
Disabled Hikers
Earth Ethics, Inc.

Earthjustice
EcoFlight
Endangered Species Coalition
Environment America
Environmental Action
Environmental Law & Policy Center
Environmental Protection information
Center- EPIC
Extinction Rebellion PDX
Forest Keeper
Forest Web
Foundation Earth
Friends of Big Ivy
Friends of Blackwater, Inc.
Friends of Douglas Fir National Monument
Gallatin Wildlife Association
Gallatin Yellowstone Wilderness Alliance
Georgia ForestWatch
Great Old Broads for Wilderness Central
Oregon Bitterbrush Broads
Great Old Broads for Wilderness,
Willamette Valley Broadband
Green Cove Defense Committee
GreenLatinos
Greenpeace USA

Healthy Ocean Coalition
I Heart Pisgah
Inland Ocean Coalition
John Muir Project of Earth Island Institute
Kentucky Heartwood
Kettle Range Conservation Group
Kitsap Environmental Coalition
Kitsap Environmental Coalition
Klamath Forest Alliance
League of Conservation Voters
League of Women Voters of the United States
Los Padres ForestWatch
Massachusetts Forest Watch
Metro Climate Action Team (MCAT)
National Parks Conservation Association
Natural Resources Council of Maine
Natural Resources Defense Council
Natural Resources Law
New Jersey Forest Watch
New Jersey Highlands Coalition
New Mexico Wild
Northcoast Environmental Center
Northeast Forest Watch
Northeastern Minnesotans for Wilderness
Ohio Environmental Council
Okanogan Highlands Alliance
Old-Growth Forest Network
Oregon Environmental Council
Oregon Wild
Partnership for Policy Integrity
Patagonia
Portland Youth Climate Strike
Rachel Carson Council
RESTORE: The North Woods
Rocky Mountain Wild
Safe Alternatives for our Forest Environment
Save the Yellowstone Grizzly
Sheep Mountain Alliance
Sierra Club
Soda Mountain Wilderness Council
South Umpqua Rural Community Partnership

Southern Utah Wilderness Alliance
Standing Trees
Sunrise Beaverton
Sunrise PDX
Sustainable Rogue Valley
The Enviro Show
The Forest Advocate
The Lands Council
The Ocean Project
Thurston Climate Action Team
TreeKeepers of Washington County (Oregon)
Umpqua Natural Leadership Science Hub
Umpqua Watersheds
United Plant Savers
Urban Nature Partners PDX
Waterway Advocates
Wenatchee Valley Climate Advocates
Wendell State Forest Alliance
Wild Heritage, a project of Earth Island Institute
WildEarth Guardians
Williams Community Forestry Project
Women's Earth and Climate Action Network (WECAN)
Yaak Valley Forest Council