

Dear [Secretary Haaland](#) and Secretary Vilsack,

On behalf of our members and supporters, the undersigned organizations thank you for your [report](#) on mature and old-growth forests (MOG) pursuant to President Biden's [Executive Order 14072](#) and the [Advanced Notice for Proposed Rulemaking](#) on MOG. Our organizations believe it is absolutely critical that the proposed rulemaking include full protections for all MOG and large trees within MOG from all forms of commercial logging, and that these protections continue to apply to all MOG after fires or other natural processes occur. It is imperative that the agencies use the best available science in developing a proposed alternative that protects all large trees and MOG as requested by [over 180 top scientists](#), including those involved in the Intergovernmental Panel on Climate Change, and researchers in carbon accounting, wildfire ecology, biodiversity, aquatics, and natural resource economics.

Much of the best available science for rulemaking can be found in [comments](#) prepared by Wild Heritage, which includes extensive documentation of the climate and biodiversity importance of MOG and large trees. Specifically, we request that you address the top stressors to MOG as all forms of commercial logging and related active management, including large tree removals in thinning operations, roads, ORVs, livestock grazing, mining, and biomass energy utilization that have accumulated over large expanses. Such stressors degrade ecosystem integrity and the resilience of ecosystems to climate change, wildfires, and insect outbreaks. We note, as well, that even large wildfires only consume a [very small proportion of tree biomass](#), while [thinning emits far more carbon into the atmosphere than fire](#) over an equal area.

We request that you clearly recognize the main reason why MOG and large trees are at an historic low is because of historic and ongoing logging, which should be prohibited to allow the ecosystems to recover old-forest functions and carbon storage over time. To begin, we request that you cancel the dozens of commercial [logging sales](#) within MOG nationwide.

MOG and large trees are the nation's most important [terrestrial carbon sink](#). They contain myriad [ecosystem and climate benefits](#), including [carbon dense forests](#) that accumulate carbon as trees increase in [size](#), while also providing irreplaceable habitat for imperiled species and drinking water source areas, all of which will be at a [premium](#) in a changing climate. Large trees within MOG are the most fire-resistant members of the forest community because they accumulate a thick-insulated bark and drop lower branches as they age. When MOG forests burn, they tend to do so in [lower fire severities](#) and readily [bounce back](#) after even severe fires. There is simply no ecological reason to log in these forests as this would degrade their climate and biodiversity functions and release [more emissions](#) at scale than natural disturbances.

Protecting MOG and large trees in [reserves](#) or similar designations is not a fire or insect risk as forests in wilderness, roadless areas, and parks tend to burn in [lower severities](#) compared to logged landscapes.

Notably, the US signed the Glasgow Forest Pledge to end deforestation and forest degradation globally, the Paris Climate Agreement related to sinks and reservoirs of carbon, and the White House announced the "[roadmap for nature-based climate solutions](#)." Ending commercial logging

within MOG is consistent with these policies and would begin necessary steps toward the President's EO 14072 as well as the 30 x 30 [Executive Order 14008](#).

Sincerely,

350 Eugene
350 Salem Oregon
Alliance for the Wild Rockies
Alpine Lakes Protection Society
Athens County's Future Action Network
Biofuelwatch
Blue Mountains Biodiversity Project
Burbank/Elliot Neighborhoods
Cascadia Climate Action Now
Center for Responsible Forestry
Center for Sustainable Economy
Coastal Plain Conservation Group
Dogwood Alliance
Earth Action
Earth Ethics
Earth Law Center
Earth Neighborhood Productions
Endangered Species Coalition
Forest Web
Forests Forever
Friends of the Clearwater
Friends of Douglas-fir National Monument
Great Old Broads for Wilderness, Cascade-Volcanoes Chapter
Great Old Broads for Wilderness, Central Oregon Bitterbrush Broads Chapter
Great Old Broads for Wilderness, Polly Dyer Seattle Broads Chapter
Great Old Broads for Wilderness, Willamette Valley Broadband Chapter
Greenpeace USA
Inland Empire Task Force
John Muir Project
Kettle Range Conservation Group
Kitsap Environmental Coalition
Last Tree Laws Massachusetts
Los Padres ForestWatch
Massachusetts Forest Watch
Metro Climate Action Team
New Jersey Forest Watch
New Jersey Highlands Coalition
North Cascades Conservation Council
Northeast Forest Watch
Olympic Climate Action
Orca Conservancy

Pacific Coast Federation of Fishermen's Associations and Institute for Fisheries Resources
Pacific Rivers
Partnership for Policy Integrity
Pennsylvania Interfaith Power & Light
Rachel Carson Council
RESTORE: The North Woods
Restoring Earth Connection
Santa Fe Forest Coalition
Sequoia ForestKeeper
Sisters Trails Alliance
Sonoma County Climate Activist Network (SoCoCAN!)
Spokane Audubon Society
Support Roaring Rock Park
Tennessee Heartwood
The Conservation Angler
The Enviro Show
The Forest Advocate
The People's Justice Council
Thurston Climate Action Team
Umpqua Natural Leadership Science Hub
Umpqua Watersheds
United Plant Savers
Utah Physicians for a Healthy Environment
Washington Wildlife First
Western Wildlife Outreach
Whatcom Million Trees Project
Wild Heritage, Project of Earth Island Institute
Wild Nature Institute
Wild Orca
Wild Watershed
Williams Community Forest Project
Worthy Environmental