

Dear Secretary Haaland and Secretary Vilsack,

On behalf of our members and supporters, the undersigned organizations thank you for requesting public input on how the Forest Service and Bureau of Land Management should advance critical conservation goals on federal forest lands. To meet your administration's goals for tackling the climate crisis and the biodiversity crisis and to fulfill the goals of President Biden's [Executive Order 14072](#), it is imperative that both of your agencies protect mature and old-growth forests and trees through a substantive, nationwide regulation.

As both the Forest Service and Bureau of Land Management have identified, older forests and trees are crucial for addressing the climate crisis. [Older trees](#) and [stands](#) store and accumulate the vast majority of the above ground carbon in a forest, and logging older forests and trees grossly [undercuts these benefits](#). Nationally, [carbon losses from clearcuts and other logging](#) are [up to 5 times higher](#) than emissions from fire and other natural forest disturbances combined.

Your agencies have indicated an interest in prioritizing climate resilience. [Forests and trees that are allowed to grow old](#) enhance climate resilience by being [core reservoirs of carbon, biodiversity, and watershed integrity](#). These forests are often well-established ecosystems that are relatively [resistant and resilient to changing conditions](#). They provide climate refugia even as conditions around them change. Big trees are generally fire-resistant, with thick bark and raised crowns, and even when dead have comparatively more moisture than smaller snags. And they provide these values throughout and well beyond their long lives. [Protecting these climate-critical forests and trees from logging](#) to ensure the long-term retention of these values is an essential part of advancing climate resilience.

Our older forests are also [critical for addressing the biodiversity crisis](#). The [complex structure older forests and trees](#) develop provides [vital and unique habitats for birds up above](#), critters [down below](#) and everything in between. These forests often have shady canopies, providing habitat for species that need cool conditions. And even the [dead trees continue to offer snags and coarse woody debris](#), which are ideal habitats for many species.

In addition, [intact forested watersheds produce very high quality water](#) vital for aquatic life in the forest and the communities who depend on it downstream.

Our organizations urge you to end ecologically harmful logging of mature and old growth forests and trees on federal land. While there are certainly other threats to our older forests, the threat of logging is fully under your control and can be quickly acted on without undercutting your ability to address other threats to communities and older forests.

And the logging on federal lands is clear and present, as the Advance Notice of Proposed Rulemaking acknowledges. More than 370,000 acres of mature and old-growth are on the chopping block, from Vermont to Oregon. Our groups have identified 22 different logging projects, both planned and under way, that will cut mature and old-growth trees. For example, the Forest Service [is considering a project](#) that would log nearly 12,000 acres in Vermont's Green Mountain National Forest, 92% of which is

classified as mature or old. In Wisconsin, a proposed [project](#) in the Chequamegon-Nicolet National Forest would log 12,000 acres of forest rich in mature stands. And in Oregon, the [Western Oregon BLM plans](#) to cut or "treat" more than 13,000 acres of which 3,000 acres are mature and old-growth. The project will clearcut mature and old-growth forests that border many communities and residences west of Eugene. Logging will degrade or remove [habitat](#) for spotted owls, marbled murrelet, red tree voles, and coho salmon.

We ask you to act swiftly to protect mature forests and trees for their current natural values and so that they can grow to become old growth and continue their work to help mitigate the climate crisis, contribute to healthy watersheds, and provide ecosystem resilience. Protection in the form of a rule must durably safeguard these values, be national in scope, and be simple to apply at the field level. And the agencies must meaningfully engage with Tribal Nations as they pursue these protections. These forests are worth more standing.

Sincerely,

1. 350 Eugene
2. 350 Rutland County
3. 350 Salem OR
4. 350 Seattle
5. 350 Wisconsin
6. Action for the Climate Emergency (ACE)
7. Alaska Rainforest Defenders
8. Alpine Lakes Protection Society
9. Black Hills Sierra Group of the Sierra Club
10. California Environmental Voters
11. Californians for Western Wilderness
12. Cascadia Climate Action Now
13. Cascadia Wildlands
14. CCoHOPE Indivisible
15. Center For Biological Diversity
16. Central Oregon LandWatch
17. Chattooga Conservancy
18. Citizens Climate Lobby Charlottesville
19. Climate Law & Policy Project
20. Climate Reality Greater Maryland
21. Climate Writers
22. Community Hiking Club
23. Conservation Northwest
24. Creation Justice Ministries
25. Dogwood Alliance
26. Earth Ethics, Inc.
27. Earthjustice
28. EcoFlight
29. Ecumenical Ministries of Oregon, Oregon Interfaith Power & Light
30. Elders Climate Action Maryland
31. Endangered Species Coalition
32. Environment America
33. Environmental Protection Information Center (EPIC)
34. Fact Ohio
35. Forest Keeper
36. Forest Web
37. Friends of Animals
38. Friends of Big Ivy
39. Friends of Blackwater, Inc.
40. Friends of the Bitterroot
41. Friends of the Clearwater
42. Gallatin Wildlife Association
43. Give A Shift

44. Green America
45. Green Cove Defense Committee
46. Green Sanctuary Committee, First Unitarian Universalist Society of Marietta, Ohio
47. GreenSnohomish
48. High Country Conservation Advocates
49. I Heart Pisgah
50. Indivisible Austin
51. Indivisible Huron Valley
52. Information Network for Responsible Mining
53. Interfaith EarthKeepers
54. Interfaith Power & Light
55. Kentucky Heartwood
56. Kettle Range Conservation Group
57. Kitsap Environmental Coalition
58. Klamath Forest Alliance
59. KS Wild
60. League of Conservation Voters
61. Leelanau Indivisible
62. Los Padres ForestWatch
63. Metro Climate Action Team
64. Natural Resources Council of Maine
65. Natural Resources Defense Council (NRDC)
66. Natural Resources Law
67. NE Forest Watch
68. New Mexico Wild
69. New Mexico Wildlife Federation
70. NJ Forest Watch
71. Northern Front Range Broadband of Great Old Broads for Wilderness
72. Old-Growth Forest Network
73. Oregon Wild
74. Owen-Putnam Friends of the Forest
75. Presbyterians for Earth Care Advocacy Committee
76. Progressive Democrats of America, Oregon Chapter
77. Rachel Carson Council
78. RESTORE: The North Woods
79. Riding Tide Wenatchee
80. Rio Grande Valley Broadband of the Great Old Broads for Wilderness
81. Rocky Mountain Wild
82. San Luis Valley Ecosystem Council
83. Sheep Mountain Alliance
84. Sierra Club
85. Spokane Audubon Society
86. Standing Trees
87. Statewide Indivisible Michigan
88. The Forest Advocate
89. The Mountain Pact
90. Thurston Climate Action Team
91. Umpqua Natural Leadership Science Hub
92. Umpqua Watersheds
93. Western Slope Conservation Center
94. Western Watersheds Project
95. Whatcom Million Trees Project
96. WildEarth Guardians
97. Wilderness Workshop
98. Willamette Valley Broadband of the Great Old Broads for Wilderness
99. Williams Community Forest Project
100. Women's Earth and Climate Action Network (WECAN)