

To: The Honorable Tom Vilsack, United States Secretary of Agriculture
The Honorable Deb Haaland, United States Secretary of the Interior

Cc: Randy Moore, Forest Service Chief, USFS
Homer Wilkes, Under Secretary for Natural Resources and Environment, USFS
Meryl Harrell, Deputy Under Secretary for Natural Resources and Environment, USFS
Chris French, Deputy Chief for National Forest Systems, USFS

Tracy Stone Manning, Director, BLM
Laura Daniel-Davis, Principal Deputy Assistant Secretary, BLM
Nada Culver, Deputy Director, Policy and Programs, BLM

Re: Conserving Mature and Old-Growth Forests as a Cornerstone of U.S. Climate Policy

Date: July 11th, 2022

Dear Secretary Vilsack and Secretary Haaland,

We, the undersigned organization and the millions of members and supporters we represent, respectfully request that you immediately begin a rulemaking process that ensures strong, durable protections for mature and old-growth trees and forests across federal lands as a cornerstone of U.S. climate policy. Conserving our mature and old-growth trees and forests represents one of the simplest and most cost-effective climate solutions available. Such a rule would support a powerful natural climate solution, helping us address the unprecedented threats of climate change and biodiversity loss while also safeguarding vital sources of clean water and recreation for all Americans. We cannot afford to delay adopting this key strategy.

In light of the Earth Day Executive Order 14072, Strengthening the Nation's Forests, Communities, and Local Economies, and the recent Secretarial Memorandum, Climate Resilience and Carbon Stewardship of America's Forests and Grasslands, it is clear that this administration understands the indispensable value that mature and old-growth forests provide. Now that understanding needs to drive an open, transparent public engagement process that results in meaningful, lasting regulations that endure as a climate legacy of the Biden Administration.

The need for this shift to a new management paradigm is pressing. Across the country on federal forests, numerous logging projects that cut mature and old-growth trees continue to move forward. The examples below highlight this ongoing threat, but do not reflect the large number of other harmful projects around the country.

Flat Country Project (Willamette National Forest, OR)

The Flat Country Project includes 1,000 acres of clearcut-style logging in Douglas-fir and hemlock stands 98-170 years old. Although the project review states that legacy trees will be protected in some of the proposed units, multiple areas contain legacy trees with complex old growth that are not listed to be protected in the Record of Decision.

Jacob Ryan Project (Kaibab National Forest, AZ)

The Forest Service is currently logging thousands of old-growth ponderosa pine trees as part of the Jacob Ryan timber sale in Northern Arizona's Kaibab Plateau, perched on the North Rim of Grand Canyon National Park. The project decision included 724 acres of patch cuts, and was projected to result in a loss of more than 100 acres of old-growth forest. Observations in the field suggest that the true impact of old tree logging is far greater than that disclosed in the project's NEPA documents.

Bear Country Project (Klamath National Forest, CA)

Roughly 2,000 acres of commercial logging within Eddy Gulch Late Successional Reserve. The project would also permanently remove 923 acres of northern spotted owl (NSO) habitat in some of the only unburned forest stands in the region, home to one of the only reproductive pairs in the entire Klamath National Forest.

Black Ram Project (Kootenai National Forest, MT)

This 95,412 acre project area, located in the remote NW corner of the Yaak River Valley, threatens old-growth forests, endangered species, and ecosystem function. Timber harvest is proposed in old growth for numerous harvest units. USFS silviculturists estimated the large western larch within the area to be 600 years old. The recognized old-growth spruce in the area exceeds 200 years old.

Buck Project (Nantahala National Forest, NC)

At around 800 acres of regeneration harvest, this is one of the largest timber sales in recent memory in North Carolina. The project aims to create young forest for wildlife habitat through commercial logging, including 150 acres of forest over 100 years old.

Integrated Vegetation Management Project (IVM) (Medford District, BLM, OR)

BLM's effort to log 10,000 acres – including old-growth forests – in southwest Oregon over 10 years is being done under the guise of creating wildfire “resilience” and without adequate environmental analysis.

Ensuring strong, durable protections for mature and old-growth forests is complementary to federal agencies' efforts to meet other management objectives, including: securing clean drinking water for communities in a rapidly changing climate where droughts and floods are becoming more common; improving wildfire resilience by protecting large fire-resistant trees; and enhancing access to outdoor recreation opportunities. We trust that you will seize this opportunity to give permanent effect to key climate provisions in the President's order and will do everything you can to position the United States as an international leader in forest conservation and natural climate solutions, offering a model for other nations to follow.

Sincerely,

Alaska Soles Broadband, Great Old Broads for
Wilderness
Appalachian Trail Conservancy
Applegate Siskiyou Alliance
Audubon Society of Lincoln City
Audubon Society of Portland
Baltimore Area Chapter of Climate Reality
Battle Creek Alliance & Defiance Canyon
Raptor Rescue
Bigfoot Trail Alliance
Blue Mountains Biodiversity Project
Bozeman Broadband, Great Old Broads for
Wilderness
Bozeman Broadband, Great Old Broads for
Wilderness
California Wilderness Coalition
Californians for Western Wilderness
Cascade Volcanoes Chapter, Great Old
Broads for Wilderness
Cascadia Climate Action Now
Cascadia Wildlands
Center for Biological Diversity
Central Oregon LandWatch
Chattooga Conservancy
Chesapeake Conservancy
Climate Reality Project, Portland
Climate Writers
Coast Range Association
Conservation Northwest
Cottonwood Environmental Law Center
Craighead Institute
Creation Justice Ministries
Deer Creek Valley Natural Resources
Conservation Association
Disability Unite
DNC Council on Environment and Climate
Crisis
Earth Ethics, Inc.
Earth Law Center
Earthjustice
Elders Climate Action Maryland Chapter
Emergency Conservation Committee / PNW
Environment America

Environmental Caucus of the Democratic
Party of Oregon
Environmental Law & Policy Center
Environmental Protection Information Center-
EPIC
Extinction Rebellion PDX
Forest Keeper
Forest Web
Foundation Earth
Friends of Big ivy
Friends of Douglas-fir National Monument
Friends of Plumas Wilderness
Friends of the Bitterroot
Friends of the Clearwater
Friends of the Inyo
Gallatin Wildlife Association
Gallatin Yellowstone Wilderness Alliance
Georgia ForestWatch
Great Old Broads for Wilderness, National
Greenpeace USA
Healthy Ocean Coalition
High Country Conservation Advocates
I Heart Pisgah
Illinois Environmental Council
Inland Ocean Coalition
John Muir Project
Kalmiopsis Audubon Society
Keep Sespe Wild
Kentucky Heartwood
Kettle Range Conservation Group
Kitsap Environmental Coalition
Klamath Forest Alliance
Klamath-Siskiyou Wildlands Center
Lane County Audubon Society
Locust Point Community Garden
Los Padres ForestWatch
Massachusetts Forest Watch
Metro Climate Action Team
Midwest Environmental Advocates, Inc.
Natural Resources Law
New Jersey Forest Watch
New Jersey Highlands Coalition

Northern San Juan Chapter, Great Old Broads
for Wilderness
Northwest Montana Broadband, Great Old
Broads for Wilderness
NRDC
Ohio Environmental Council
Old Growth Tree Society
Old-Growth Forest Network
Olympic Forest Coalition
Oregon Wild
Partnership for Policy Integrity
Patagonia
Polly Dyer Seattle Broadband, Great Old
Broads For Wilderness
Protect Ancient Forests
Rachel Carson Council
RESTORE: The North Woods
Rocky Mountain Wild
Rogue Valley Audubon Society
Salem Audubon Society
Santa Fe Forest Coalition
Selkirk Conservation Alliance
Sequoia ForestKeeper®
Sierra Club
Soda Mountain Wilderness Council
South Umpqua Rural Community Partnership
Southeast Alaska Conservation Council
Southern Environmental Law Center
Southern Oregon Climate Action Now
Southern Utah Wilderness Alliance
Standing Trees
Sunrise PDX
Sustainable Rogue Valley
Tennessee Heartwood
Tennessee Scenic Rivers Association
The Clinch Coalition
The Siskiyou Crest Coalition
Umpqua Watersheds
Waterway Advocates
Wellington Wildlands Council
White Mountain Conservation League
Wild Heritage, a Project of Earth Island
Institute
WildEarth Guardians

Willamette Valley Broadband, Great Old
Broads for Wilderness
Williams Community Forest Project
Women's Earth and Climate Action Network
(WECAN)
Yaak Valley Forest Council
198 Methods
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