

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 Climate Policy

Date: July 12th, 2022

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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  
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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  
East Cascades Audubon Society (ECAS)  
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  
350 Eugene  
350 Salem Oregon  
350 Seattle  
350PDX