

January 31, 2024

President Joe Biden  
The White House  
1600 Pennsylvania Avenue, N.W.  
Washington, DC 20500

Cc: Ali Zaidi, National Climate Advisor, The White House; Stephenne Harding, Council on Environmental Quality; Thomas J. Vilsack, Secretary of Agriculture; Deb Haaland, Secretary of Interior

**Re:** Request for an Executive Order to Place a Moratorium on Logging Mature and Old-Growth Forests, and Large Trees Generally, on National Forests and Bureau of Land Management (BLM) Lands While the Old Growth EIS Proceeds

Dear President Biden:

We are scientists with backgrounds in forest ecosystems, climate change, and natural resources writing in response to the December 20, 2023 Notice of Intent for a National Old Growth Amendment in the Federal Register (Federal Register, Vol. 88. No. 243). We applaud your Executive Order 14008 directing federal agencies to protect 30% of the nation’s lands and waters by 2030, and Executive Order 14072 directing the national inventory of mature and old-growth forests for conservation purposes, most of which are on National Forests and BLM lands. Because of the global loss of mature and old-growth forests, and large trees generally,<sup>1</sup> and their importance in mitigating the climate and biodiversity crisis on federal lands<sup>2</sup>, we fully support calls by fellow scientists for a moratorium<sup>3</sup> on logging in these critically important forests. Therefore, we request that you now direct the Forest Service and BLM to suspend all timber sales in mature and old-growth forests, and refrain from proposing new timber sales in these forests, while the federal agencies develop their Environmental Impact Statements that best comply with Executive Order 14072 in securing a national network of conservation areas.

We are concerned that the Administration’s proposed old-growth Amendment “does not alter or prescribe any substantive standards for the management of old growth forests” that in the meantime remain vulnerable to [dozens of timber sales](#) nationally and efforts by the Forest Service to increase logging of these forests before any substantive conservation takes hold. We are also concerned that the proposed Amendment excludes mature forests, and includes a

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<sup>1</sup>Lindenmayer, D. et al. 2012. Global decline in large trees. *Science* 338 (6112):1305-6  
[https://www.researchgate.net/publication/233887120\\_Global\\_Decline\\_in\\_Large\\_Old\\_Trees](https://www.researchgate.net/publication/233887120_Global_Decline_in_Large_Old_Trees)

<sup>2</sup>DellaSala, D.A. et al. 2022. Mature and old-growth forests contribute to large-scale conservation targets in the conterminous United States. *Frontiers in Forests and Global Change* <https://www.frontiersin.org/articles/10.3389/ffgc.2022.979528/full>.  
DellaSala et al. 2022. The Tongass National Forest, Southeast Alaska, USA: a natural climate solution of global significance. *Land* 2022, 11(5), 717; <https://doi.org/10.3390/land11050717>.  
Law et al. 2023. Southern Alaska’s forest landscape integrity, habitat, and carbon are critical for meeting climate and conservation goals. *AGU Advances* <https://doi.org/10.1029/2023AV000965>

<sup>3</sup>Makarieva et al. 2023. Re-appraisal of the global climatic role of natural forests for improved climate projections and policies. *Frontiers in Forests and Global Change* (<https://www.frontiersin.org/articles/10.3389/ffgc.2023.1150191/full>).  
Law et al. 2024. Old forests are critically important for slowing climate change and merit immediate protection from logging <https://theconversation.com/old-forests-are-critically-important-for-slowing-climate-change-and-merit-immediate-protection-from-logging-220771>)

loophole that would allow logging of old-growth forests under certain conditions. Additionally, based on an independent inventory of mature and old-growth forests in the conterminous United States, and the Tongass rainforest in Alaska, more than 50 million acres of mature and old-growth forests<sup>2,4</sup> are vulnerable to logging. In particular, the Amendment exempts the Tongass, the nation's highest concentration of old-growth forests and forest carbon<sup>4</sup>, from further analysis, which is inconsistent with your efforts to transition this forest out of old-growth logging.

The [Glasgow Leaders' Declaration on Forests and Land Use](#) was signed by 141 countries, including the United States, at the COP26. The declaration pledges to end global deforestation and **forest degradation** by 2030 (emphasis added). Additionally, the United States is committed to the [Paris Climate Agreement](#) that “encourages Parties to conserve and enhance, as appropriate, sinks and reservoirs of GHGs that are referred to in Article 4, paragraph 1(d) of the Convention, **including forests**” (emphasis added). Following through on these commitments in practice is crucial for climate change mitigation<sup>5</sup>.

Logging and associated road building in mature and old-growth forests and the removal of large trees on federal lands is the main form of **forest degradation** and is therefore inconsistent with your global commitments and relevant executive orders. We ask that you lead by example in signaling to the world that the United States takes its commitment seriously in halting the global biodiversity and climate crises by now directing federal agencies to enact the strongest protections for the nation's mature and old-growth forests and large trees as natural climate solutions and a flagship initiative of your [roadmap for nature-based solutions](#). Doing so would be a legacy gift of your Administration to the nation and the planet.

Sincerely,

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<sup>4</sup> DellaSala, D.A. et al. 2022. The Tongass National Forest, Southeast Alaska, USA: a natural climate solution of global significance. Land <https://www.mdpi.com/2073-445X/11/5/717>. Law, B. E., et al 2023. Southern Alaska's forest landscape integrity, habitat, and carbon are critical for meeting climate and conservation goals. AGU Advances, 4, e2023AV000965. <https://doi.org/10.1029/2023AV000965>

<sup>5</sup>Gasser et al. 2022. How the Glasgow Declaration on forests can help keep alive the 1.5C target. PNAS <https://www.pnas.org/doi/10.1073/pnas.2200519119#:~:text=At%20last%20year's%2026th%20UN,the%20Paris%20agreement%20within%20reach>. DellaSala, D.A., et al. 2023. A carpe diem moment on forests and climate policy. [https://www.esciinfo.com/uploads/article\\_pdf/6/scientific\\_6\\_7\\_03042023070834.pdf](https://www.esciinfo.com/uploads/article_pdf/6/scientific_6_7_03042023070834.pdf)

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