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Organization: Olympic Park Advocates

Title: President

Comments: Thank you for the opportunity to comment.

We are writing in support of President Biden's directive to define and inventory mature and old growth trees on public lands. In the face of escalating climate change, protecting such trees is becoming increasingly urgent in order to keep those trees and their habitat intact. They work day and night absorbing and holding on to all that carbon emitted by modern civilization.

It is time that a reliable definition for mature and old growth forests be established, since it will prevail for years to come.

The devil is in the details. Mature and old growth forests vary across the country, so clear, simple definitions are needed for each type of forest.

Here in the Pacific Northwest, we recommend this definition, which includes more than just living trees:

- forests that are naturally regenerated following natural disturbances,
- living, standing large trees 80 years and older,
- dead, standing snags to support wildlife,
- dead logs, lying on the ground to nurture the soil, support native plants, mycorrhizal fungus and to serve as nurse logs,
- dead logs in the streams to support fish populations,
- multi-story canopy consisting of native, diverse forbs, ferns, bryophytes, shrubs and young trees.

Nature is dynamic and must be allowed to grow and change, while maintaining old growth characteristics over the long term. Large natural wildfires may change the forest temporarily, but the protected forests must be allowed to recover naturally. Large scale fire suppression interrupts that process and must not be allowed.

Salvage logging must be prohibited after natural wildfires.