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Comments: As you consider input to create guidance for old-growth forests, I recognize the distinctive role that Federal forest lands play in sustaining ecological, social, and economic benefits throughout the nation and calls particular attention to the importance of mature and old-growth forests on Federal lands for their role in contributing to nature-based climate solutions by storing large amounts of carbon and increasing biodiversity, mitigating wildfire risks, enhancing climate resilience, enabling subsistence and cultural uses, providing outdoor recreational opportunities, and promoting sustainable local economic development.

I suggest that no logging occur to native trees over 100 years old, and that adjacent habitats or habitat buffers be increased for edge habitat protection. The areas around all old growth areas must be treated with the most up-to-date science to mitigate fire damage while not contributing to fuel build up over the years. Appropriate funding to hire long term and short term employees must be prioritized in order to make action on proposals put forth and indigenous communities must be involved in consultation and decision-making processes where their voice can make an impact. Young and mid-level wildlife ecologists, environmental scientists should be heavily recruited and subsidized to work on keeping the health of old growth forests in tact, supporting a generation of environmental workers.

Old growth forests are a treasure that cannot be replaced for generations, but other types of old growth habitats should also be considered for protection, including bogs, fens, wet meadows, prairie (including Garry oak habitat), meaning wetlands should not be drained, headwater areas must be protected from erosion due to logging and debris, and trees set for logging should not be planted in or near old growth habitats. Those areas that are a bit older but not defined as old growth should be reserved so it can become old growth for future generations. So much old growth forest has been lost and we should be making an effort to allow areas to regenerate over time and retire areas for logging. For those areas still selected for logging (not old growth or potential old growth), a diversity of plants should be increased. Logging areas are still habitat for many species of invertebrates, amphibians, reptiles, birds, and mammals, and planting a diversity of trees would improve habitat, and potentially increase survival rates for migrating birds. It will also increase their beauty as near mono-cultures of Douglas fir are less interesting and fulfilling to recreate in than even marginally increased diversity with hemlock, cedar, spruce, pine, and others. Logging in the 21st century is likely going to become less and less relevant to communities and more of a hazard as the summers in Washington grow hotter, drier, and longer, increasing fire risk. We know old growth forests are more fire resistant and resilient than younger forests and logging areas, and it's time to shift priorities to support the growth of forests into maturity. We can also shift from wood-based building materials to more fire resistant and sustainable materials, like cob, straw-bale, and rammed earth bricks. Over time, the improved health of forests and rivers will rejuvenate other resources and income streams like salmon, recreation, eco-tourism, and increase jobs for wild spaces.

Thank you for reading my thoughts. I'm sure you have many great ideas about how to protect old growth forests. As a wildlife professional, I am glad to see effort put in to re-evaluate how things are done. I just hope that the words are backed up by adequate funding and personnel to live up to the intentions.