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Comments: USFS and BLM,

Thank you for the opportunity to provide comments regarding a definition framework for old-growth and mature forests on federally managed lands.

An old growth forest is generally a site with abundant trees of age 200 years or older. But the important functional characteristics are:

A complex, diverse forest ecosystem, including•a diversity of trees, shrubs, and herbaceous plants;
•a diversity of structure among trees - some live, some snags, lots of fallen trees/logs lying on the ground and in the streams;•the downed trees/logs are in varying stages of rot and decomposition;•a diversity of ages of living trees, with younger trees growing in the clearings where older trees have fallen or burned or blown down;•mycorrhizal fungi all through the top layer of the soil;
•lichen growing in the canopy of old growth trees, and fallen lichen littering the forest floor (typical in Pacific Northwest old growth forests, maybe not in other places);•huge diversity of insects and other invertebrates in the soil and on the forest floor;•evidence of disturbances and [often ongoing] recovery;•streams with irregular and changing paths, and with flows slowed by logs in the stream.

An old growth forest as described above is an extraordinarily lively, busy, rich, valuable ecosystem. Thank you for your intention to define them, especially so they can be properly understood, valid, and protected.