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Comments: To the Forest Service,

The initial draft of the "Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management" includes no mention of Fungi, mycorrhizal interactions, or decomposition in the mature and old-growth forests of America. This is a gross oversight to the most important kingdom of life, Fungi. Fungi are integral to old-growth forests and some fungi only exist in mature forest environments. Mycorrhizal fungi interact with up to 90% of all land plants and enhance the growth of those plants through nutrient and water acquisition. Saprotrophic fungi are the major decomposers on Earth and play a major role in Carbon and nutrient cycling as they release organic compounds from dead plant and animal materials in old-growth forests. Even fungal diseases (which may be included as "disease" in your initial draft) play a critical role in the health and longevity of mature forests.

If we want to "create a consistent approach to manage for old-growth forest conditions with sufficient distribution, abundance, and ecological integrity (composition, structure, function, connectivity) to be persistent over the long term, in the context of climate amplified stressors" as you have said in your land management plan, then we need to include Fungi in this approach.

Sincerely,

A concerned Scientist