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Comments: Thank you for the opportunity to comment on this important topic: USFS Management of Mature and Old Growth Forests.

As stated in previous comments I have participated in past Forest Service planning activities and assisted in identifying old growth sites for the Pisgah Nantahala Plan Revision. At that time (1990) 100 year old stands were considered the cutoff date for stand age to be considered for old growth status. Other characteristics that were considered were large amounts of coarse woody debris, pit and mound topography, uneven age characteristics, presence of epiphytes, abundant fungal components, and lack of human disturbance. Most of the sites identified were in rugged remote locations, which is why they escaped heavy logging activities representative of adjacent stands. One thing that was clear at that time was that there were many stands in the 70-80 year old status that would be eligible for consideration for "old growth" status in a few decades, which is now.

In those days I would get laughed out of the room when I suggested that large clear cuts play a roll in climate change. Or I would be subjected to hearing a silviculturist in the office casually sling a racial slur. Those days should be behind us, but I feel the ignorance of understanding the importance of old growth and mature forest for maintaining biodiversity and climate stability is still lacking. The proposal of allowing commercial logging as a management tool for old growth is utterly absurd. It is the lack of commercial logging that is the essence of an old growth forest.

This isn't to say that humans can't have a roll in maintaining or attempting to improve older mature forests. Indeed, going forward it may be necessary, especially to control invasive exotic plants and pests. Intrusive activities like commercial logging are a major spreader of invasive plants. As a preventive measure, such activities should be excluded from old growth and mature forests. Trying to control invasive species after they have a stronghold is often an expensive endeavor or a lost cause. Once invasive species are present the ecosystem begins to change and to what degrees are still uncertain. While it is easy to see that native plant communities are displaced and disrupted by invasive exotic plants, little is known about the disruptive roll they play with fungi.

Fungi are the underrated workhorses of the forest ecosystems. It is important to remember that 'abundant fungal component' is a key indicator for mature and old growth forest. I would encourage the Forest Service to further study the mycology of old growth forests before making any other decisions to include commercial logging as a management tool. The mycorrhizal relationship between plants and fungi was virtually unheard of 30 years ago. Today, it may not be a household word yet, but the concept is becoming more clearly understood and accepted. The nutrient exchange between fungus and plant roots, we now know is essential in a forest ecosystem, and how trees grow. To what extent we don't know.

Based on this lack of understanding of forest ecosystems it is important that we let nature do most of the management and that we play the roll of observers. While this may sound like a hands off approach to some, it is anything but. What's needed is ATBI (all-taxa biodiversity inventory) work to understand how to manage old growth forests.

I would also like to echo the comments that recognize old growth forest as a need to store carbon, provide shade/maintain microclimate, offer recreation opportunities, and increased roadless areas, all are import factors. But I think that if you expand and manage these older forests for maximum fungal diversity, you'll do more to serve the public and future generations than you could possibly understand at this time.

Thanks for this opportunity to submit these brief comments.