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THEODORE ROOSEVELT

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**BOONE AND CROCKETT CLUB**

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Most of the Forest Plans have management guidelines for old-growth management that is tailored to the types of forests found on each unit. The Boone and Crockett Club supports the existing approach and comments that it should be maintained.

**What criteria are needed for a universal definition framework that motivates mature and old-growth forest conservation and can be used for planning and adaptive management?**

The Boone and Crockett Club does not support a universal definition of mature and old growth forests. Because of the wide variety of forest types, elevations, climate regimes, disturbance regimes, and land ownership history, age and size of trees are imprecise indicators and will vary widely.

**What are the overarching old-growth and mature forest characteristics that belong in a definition framework?**

The Boone and Crockett Club questions the value of the USFS and BLM attempting to create “overarching old-growth and mature forest characteristics”. Rather, we agree with the Eastern Region (Region 9), which when previously tasked with developing an old-growth definition, concluded that “there is no consensus on the concept of old-growth”, noting that there were at least ten different definitions in the scientific literature at that time, each specific to a unique forest type.

**Additional comments.**

The Boone and Crockett notes that, for many forest types, late successional forest development is a transitory stage – eventually to be replaced by an early successional phase due to management or natural disturbance, or transition to a different forest type. The benefits of early successional forests, like the benefits of older stands, are best addressed through Forest Plans and project implementation. Today, most National Forests, and especially eastern and midwestern units, are having difficulty meeting early successional stand goals. From a wildlife habitat standpoint, that failure is negatively impacting population sustainability. The time, resources, and focus of this old growth definition and mapping exercise will exacerbate the significant problem of inadequate early seral forests.

On behalf of the Boone and Crockett Club, I appreciate your consideration of these comments.

Sincerely,

Tony A. Schoonen  
Chief Executive Officer  
Boone and Crockett Club