



**ROCKY MOUNTAIN
ELK FOUNDATION**

August 29, 2022

Mr. Jamie Barbour
Assistant Director
Ecosystem Management Coordination
USDA Forest Service
Washington, DC

Dear Mr. Barbour:

The Rocky Mountain Elk Foundation's (RMEF) mission is to ensure the future of elk, other wildlife, their habitat and our hunting heritage. We represent more than 225,000 members nationwide. Since inception in 1984, RMEF has conserved or enhanced more than 8.4 million acres of North America's most vital habitat for elk and other wildlife.

RMEF appreciates the opportunity to comment on the U.S Forest Service's (USFS) and Bureau of Land Management's (BLM) Request for Information (RFI) to define old growth and mature forests (FR Doc. 2022-15185). RMEF has a long-standing history with both agencies in conserving and enhancing public lands, including 5.9 million acres across USFS and BLM lands. Many of these projects occur in forested landscapes where active forest management has been key to maintaining forest health. Old-growth forests are not places undisturbed by nature for centuries. Existing old-growth forests developed along multiple pathways with many low-severity and some high-severity disturbances along the way. Those disturbances continue to maintain the health of old-growth forests.

RMEF supports the USFS and BLM efforts to improve consistency in forest inventory practices and creation of a broad definition framework that provides guidance to regional/local offices while avoiding prescriptive language. The Executive Order 14072 Strengthening the Nation's Forests, Communities, and Local Economies requires definition of old-growth and mature forests on federal lands, and this first step is intended to provide these definitions for the purpose of conducting an inventory. RMEF cautions that while creating definitions does not, by itself, change any current forest management policies or practices, explicit definitions will stem regional/local ability to tailor definitions to fit their forest communities.

RMEF suggests incorporating the following when considering the bearing that old-growth and mature forest definitions may have on forest policy and management:

- A single prescriptive national definition does not account for the diverse ecological systems represented across USFS and BLM lands; rather a broad framework (guidelines) should be provided to help shape local definitions based on the most recent science.

- Existing definitions across USFS and BLM planning and project documents represent a wide variety of definitions. Not all forests with old trees are scientifically defined as old-growth. Among those that are, the variations are so vast that multiple definitions of old-growth forests are needed. This variety of current definitions is appropriate to most accurately describe variation in vegetative community across regions/states.
- In an effort to maintain successful shared stewardship activities, state forestry definitions should be considered.
- Consideration should be given to exclude non-native tree species or other unwanted native species.
- Resilient forests are composed of uneven aged structure achieved through active management. Definitions should consider that large, mature trees store carbon; younger, smaller class trees are responsible for most of the sequestration.
- Funding and authority for additional staffing will be essential to conduct the inventory across all USFS and BLM lands.

RMEF appreciates your consideration of these comments and looks forward to working with USFS and BLM as the rulemaking process proceeds.

Sincerely,

A handwritten signature in black ink that reads "Blake L. Henning". The signature is fluid and cursive, with a large loop at the end of the last name.

Blake L. Henning
Chief Conservation Officer