

Data Submitted (UTC 11): 1/31/2024 2:01:00 AM

First name: Kate

Last name: Gessert

Organization:

Title:

Comments:

Mature forest must be included in the rule

Prior Administration orders and plans (e.g., Executive Order 14072, the USDA Forest Service Climate Adaptation Plan, and Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management) emphasized the importance of protecting both old-growth and mature forest. Section 2(c)(iii) of Executive Order 14072, for example, directs USDA and DOI to "develop policies, with robust opportunity for public comment, to institutionalize climate-smart management and conservation strategies that address threats to mature and old-growth forests on Federal lands."

The proposed rule, Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356, while an important step forward, inexplicably omits mature forest despite these preceding directives. Why was mature forest dropped? Is USFS preparing an additional rule for mature forest? And if so, what is the timeline?

The protection of mature forest is vital for addressing the climate and biodiversity crises. First, there is far more mature forest than old-growth (according to the USFS inventory, 2.5 times as much nationwide).

Mature forest must be retained throughout the USFS system, including east of the Rockies where almost no old-growth forest remains. These areas should be allowed to continue to sequester carbon, provide wildlife habitat and recreation opportunities, recharge aquifers, and provide other essential ecosystem services. We urge USFS to add protection of mature forest to all national forest management plans.