



February 2, 2024

To: Director, Ecosystem Management Coordination
201 14th Street SW
Mailstop 1108
Washington, DC 20250-1124

Submitted Through Forest Service Public Comment Portal

<https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>

RE: Project 65356: *Proposal to amend all land management plans for units of the National Forest System (128 plans in total) to include consistent direction to conserve and steward existing and recruit future old-growth forest conditions and to monitor their condition across planning areas of the National Forest System*

Dear Director:

West Virginia is the third most forested state in the U.S. West Virginia is 78% forests – including almost a million acres of the Monongahela National Forest (MNF) managed by the United States Forest Service (USFS). West Virginia Rivers Coalition (WV Rivers) appreciates the opportunity to make comments about the proposal to amend all 128 forest plans for consistent direction regarding older, mature, and old growth forest conditions.

WV Rivers is the only statewide group working on policies for clean rivers and waterways. WV Rivers has advocated for 32 years for clean, drinkable, fishable, and swimmable waters in West Virginia. Healthy forests are essential to healthy waters.

WV Rivers made extensive comments on August 15, 2022, about the Definition and Inventory of older/mature/old growth forests; [comments are located HERE](#), the letter ID is NP-3239-4492-5340, and our previous comments are incorporated in these comments. WV Rivers would like to emphasize a couple of points that are relevant to the proposal to amend all 128 Forests Plan to address older, mature, and old growth issues.

WV Rivers supports amending all Forest Plans at the same time, and believes the proposal contains many positive steps towards protecting older/mature/old growth trees and forests.

We agree with addressing an issue as important as climate change, Executive Order (EO) 14072, and the importance of older/mature/old growth trees and forests for measurable on-going carbon capture. This is an efficient (one Environmental Impact Statement (EIS), one report, etc. – and an overall speedier process to implement EO 14072) process to focus Forest System-wide attention to the critical importance of older trees and forests for climate change mitigation.

We also support ecologically based vegetation management in older/old growth areas, without relying upon economic factors (except as needed for wildfires). Each national forest unit will have a strategy for identifying current and future old growth areas including the creation of a nationwide old-growth monitoring network.

We support amending all 128 Forest Plans regarding older/mature/old growth trees and forests and believe that any amendment must recognize the distinct differences in history, threat, and forest composition when comparing Eastern with Western Forest lands.

The USFS, in Background Comments in the Federal Register stated:

The initial analysis found that mortality from wildfires is currently the leading threat to mature and old-growth forest conditions, followed by insects and disease. The analysis found that tree cutting is now a relatively minor threat compared to climate amplified disturbances such as wildfire, insects and disease. However, past management practices, including timber harvest and fire suppression, contributed to current vulnerabilities in the distribution, abundance, and resilience of old-growth forest characteristics.

We believe that past and current harvesting practices are a larger threat in Eastern Forests than the USFS background information seems to imply. Clear cutting entire stands may result in cutting the very trees and small areas most likely to have the most carbon storage. While we addressed this concern at length in our August 15, 2022, comment, we would like to again share some of the research and USFS concerns about “old growth” in Eastern Forests:

- Researchers have indicated the difficulty in finding a uniform definition for ‘old growth’ because of variations among forests as to species type, varying longevity, and the timing of the last human disturbance of the forests. These

variations “are real differences in these ecosystems across the local landscape and the continent. The challenge of any definition, therefore, is the tradeoff between generality and acknowledgment of complexity (Barton and Keaton, eds., 2018).” Chapters 4 and 5 of this book provide additional complexities in determining ‘old growth’ in Appalachian Forests. Another scholar commented, “The diversity of old-growth forest types makes it impossible to use the same policies and management practices everywhere.” Spies, Thomas A. 2004. “Ecological Concepts and Diversity of Old-Growth Forests.” *Journal of Forestry* 102(3): 14-20. <https://doi.org/10.1093/jof/102.3.14>.

- The Monongahela National Forest Plan (2006, revised 2011) has grappled with the complexity of determining ‘older growth’ in this expansive Eastern U.S. Forest. (Appendix B to the plan discusses “Old Growth.”) Because of the re-forestation in the 1920s and 1930s, “old growth” in the MNF is less than 1% of the forest, and is in “small, scattered patches within a larger matrix of primarily 70- to 90-year-old forests” (B-2, B-4). The MNF plan indicates seven criteria: age, species composition, structural diversity, woody debris, gap formation, patch size, and adjacency & scale (B-2 – B-3). The MNF plan specifically mentions the possibility of areas of the MNF turning into ‘older growth’ with the passage of time (B-5).
- USFS Region 8 has also grappled with the complexities of defining and inventorying ‘old growth’ in forests of the Eastern United States (Guidance for Conserving and Restoring Old-Growth Forest Communities on National Forests in the Southern Region. 1997.) The Region 8 Guidance also recognizes the (relatively) young age of Southern Region forests, describing ‘old growth’ areas, but also “Future Old Growth” and “Possible Old Growth” (page 7). The Guidance also recognizes that tree species have different ages at which the species is considered “old” (Table 1, 10). Patch sizes will also vary, with Southeastern forests having “large, medium, and small-sized old-growth areas” and forests in the “Coastal Plains, Northern and Southern Cumberland Plateau, Southern Appalachian Piedmont, and Mississippi Alluvial Valley” will have “medium and small-sized old-growth” areas (16). Importantly, the Guidance recognized the “broken ownership pattern” (a mixture of public and private land ownership) and that “the land ownership patterns and natural resource management considerations may make the identification of large-sized old-growth areas impractical” (16).

Utilizing one proposal to amend all 128 Forest Plans should contain a specific definition of “older/mature/old growth trees and forests” for Eastern United States Forests.

Eastern forests were heavily harvested from 1880 to 1920. As a result, most of the

'oldest' forest areas are about 100 years old. However, even with almost complete timber harvests, old trees and forest stands do exist. As implied in the MNF plan, and specifically stated in Region 8 guidance, *any* definition for Eastern Forest will need to capture in the definition very small stands of old/mature trees and very small (not adjacent) sections within an entire tree stand as being "older/mature/old growth." Of equal concern is too broad of a single definition and using undefined terms or terms with disputed or varying meanings. For example, 'considering region or ecosystem' will not provide sufficient guidance for US Forest Service Managers to define and inventory "older and mature forests."

Therefore, we propose:

- (a) a two-subpart definition of "older/mature/old growth trees and forests" one applicable to Western US forests and one applicable to Eastern/Southern/Appalachian forests – so that no region in the U.S. is limited in its identification and inventory of older/mature/old growth areas because the region's unique factors are not captured in a broad definition; and

- (b) a criteria of stand size to be considered 'old growth' and therefore inventoried that allows for the designation of very small areas (less than a normal stand sized tree stand) as old/mature/older growth, and that these areas be protected and managed without regard to the management prescription or project harvesting plan for the rest of the stand.

In summary, WV Rivers appreciates the opportunity to comment on the proposal for amending all 128 Forest Plans to ensure protection for our older/mature/old growth trees and forests. We hope the policy and the EIS for the proposal will be expansive and inclusive enough to identify small areas of old growth, so that these legacy trees and their essential carbon storage may be protected to the full extent as contemplated by EO 14072. It is critical to protect all older/mature/old growth trees and areas in our National Forest System; as well as provide the carbon storage benefits set forth in the EO.

Best regards,

Angie Rosser, Executive Director
West Virginia Rivers Coalition