



West  
Virginia  
Highlands  
Conservancy

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February 2, 2024

Tom Vilsack  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, DC 20250

Randy Moore  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Washington, D.C. 20520

RE: Scoping Comments for the proposed Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #6535

Dear Secretary of Agriculture Vilsack and U.S. Forest Service Chief Moore,

On behalf of our members, the West Virginia Highlands Conservancy respectfully submits the following comments regarding the scoping period for the Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System #65356.

The West Virginia Highlands Conservancy is a nonprofit membership organization incorporated in West Virginia. Established in 1967, WVHC is one of West Virginia's oldest environmental advocacy organizations. For over five decades, the West Virginia Highlands Conservancy has worked to promote, encourage and work for the conservation—including both preservation and wise management—of the natural resources of West Virginia and the Nation. We focus primarily on the Highlands region of West Virginia, but our work is for the cultural, social, educational, physical health, spiritual and economic benefit of present and future generations of residents and visitors alike.

The West Virginia Highlands Conservancy supports the Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System. This plan is critical in the preservation of current, and promotion of future old-growth forests that have become increasingly threatened from a long history of human activity. Below, we describe in greater detail our position to support the protection of old-growth forests, specifically as it relates to forests in the eastern United States, and importantly, the Monongahela National Forest, as well as recommendations for modifications and additional language to strengthen the proposal.

In Eugene Odum's foundational 1969 article, "The Strategy of Ecosystem Development," he generally defines succession, in part, as an ecosystem that moves predictably in a given direction—for our forest ecosystems in the eastern United States, that predictable general direction is toward an old-growth forest. Indeed, the specific characteristics of what constitutes an old-growth forest are still debated, with some defining a forest objectively as old-growth when its carbon biomass reaches 95% of its theoretical maximum, or when it reaches a specified

age. Regardless of definition, a common characteristic of an old-growth forest is it has generally not experienced any recent catastrophic disturbances and remains relatively intact. Consequently, old-growth forests are invaluable and irreplaceable in the wealth of ecosystem services and societal benefits they provide.

Old-growth forests store massive amounts of carbon and are critical to providing microclimate refugia for understory fauna and flora by providing a buffer against rising land surface temperature. Additionally, they often mitigate nutrient leaching, especially when compared to systems that have been disturbed, while simultaneously providing myriad other ecosystem services. Moreover, the benefits that old-growth forests provide are not easily recouped once the forests are lost—in many cases it will take centuries for these forests to regenerate.

In the late 19th and early 20th centuries, many acres of forestland that now comprise the nearly one million-acre Monongahela National Forest in West Virginia were timbered—all but annihilating the virgin old-growth forests in West Virginia. In areas where old-growth does exist today, it is limited to small, scattered patches within a larger mix of primarily 70- to 90-year-old forests, representing less than one percent of the entire forest. Historically, the Monongahela National Forest Service has based identification of old-growth forests on remnant, virgin timber. When establishing old-growth forest in this region, the Monongahela National Forest Service should utilize the new criteria as defined in the Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management April 2023 fulfillment of Executive Order 14072 to identify stands of old-growth forest as eligible for protection under this proposal.

Recently proposed projects by the Monongahela National Forest Service, such as the Upper Cheat River Project, will clearcut 3,463 acres of mature hardwood forest and specifically target stands of forest in this area with trees over 100 years old, with some trees identified as older than 200 years.

The proposed Land Management Direction Plan for Old-Growth Forest Conditions Across the National Forest System states, “Vegetation management within old-growth forest conditions may not be for the *primary* purpose of growing, tending, harvesting, or regeneration of trees for economic reasons. Ecologically appropriate harvest is permitted...” In the case of the Upper Cheat River Project, for example, the stated purpose as outlined by the Monongahela National Forest is to improve forest health and age class diversity, improve wildlife and fish habitat, restore soils and riparian corridors, and provide a network of sustainable roads. The Upper Cheat River Project, as well as countless others across the country, would not be excluded under the new policy as currently proposed.

This underscores the importance of the proposed Adaptive Strategy for Old-Growth Forest Conservation that identifies areas prioritized for old-growth retention and promotion. Because of the history of logging across public forest lands and imminent projects targeting mature and old-growth forest stands in the Monongahela National Forest, the recruitment of more old-growth forests is urgently needed, and we encourage the agency to create meaningful and concrete pathways that protect more mature forests from logging.

We urge the United States Forest Service to provide clarity to this proposed policy and close this blatant loophole that allows for the ongoing harvesting of timber stands within mature and old-growth forests under the guise of improved forest health and to identify logging as a threat to mature and old-growth forests. It is imperative that the language be strengthened to never allow for the logging, harvest, or commercial exchange of old-growth trees, even if economic reasons are not the *primary* purpose guiding vegetation management in old-growth areas.

Lastly, we recommend that the U.S. Forest Service make the data from the Mature and Old-Growth Forests: Definition, Identification, and Initial Inventory on Lands Managed by the Forest Service and Bureau of Land Management available to the public.

In conclusion, we applaud the Biden Administration for this ambitious proposal and recognition of the importance of conserving these vital ecosystems for the multitude of ecosystem services and societal benefits they provide. Thank you for the opportunity to provide input on this momentous proposal to protect our natural resources for generations to come.

Sincerely,

A handwritten signature in black ink that reads "Marilyn Shoenfeld". The signature is written in a cursive, flowing style.

Marilyn Shoenfeld  
President  
West Virginia Highlands Conservancy