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*Submitted via online portal*

Linda Walker  
Acting Director  
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United States Forest Service  
201 14th Street SW, Mailstop 1108  
Washington, DC 20250-1124

**Re: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System, Project No. 65356**

Dear Ms. Walker:

I have been involved with the old growth issue in the Southern Appalachian region for over 40 years. During the 1970s, 1980s, and into the 1990s, the Forest Service did not take old growth in the east seriously. Forest Service staff would deny that there was any old growth forest on national forest lands in the east. Despite concrete examples of old growth forest, such as Joyce Kilmer Memorial Forest that clearly were old growth forest, the idea of old growth in the east was summarily rejected by Forest Service staff. When pressed with these indisputable examples, Forest Service staff would allow that there might be a few remnants, but all of these sites were known, and old growth wasn't a valid desired condition anyway.

It was obvious during this period to some of the public that old growth forest did still exist on national forest land. In fact when we went on field trips to proposed timber sales we were running into forest that had characteristics that ecologists used as criteria for old growth forest. Conservation groups in the early 1990s started sponsoring field surveys for old growth that I was a part of. My main role in this effort was getting the field data into GIS, creating spatial mapping of these old growth sites, and integrating these sites with other priority conservation lands to create a landscape perspective of priority conservation lands. The multi-agency Southern Appalachian Assessment (SAA) also occurred during the mid-1990s. This effort, led by scientists from many agencies including the USFS, acknowledged the existence of old growth and the values of old growth forest. In fact, an old growth team that had participated in the SAA was

tasked by the USFS to develop old growth guidance for Region 8. This Old Growth Guidance<sup>1</sup>, which was intended to guide management direction during national forest plan revision in R8, played a significant role in legitimizing old growth within Region 8. With operational criteria for existing old growth by forest type and guidelines for future old growth networks that needed to be addressed in new forest plans, the R8 Old Growth Guidance gave direction that Forest Service staff could not ignore. The Old Growth Guidance gave those of us in Region 8 a tool to at least force discussion of old growth issues.

Unfortunately, the Guidance gave almost complete discretion to how Forest Service staff applied this guidance. At the project level, District staff largely ignored the old growth issue and the Old Growth Guidance. Despite the guidance giving clear and measurable criteria for existing old growth, District staff almost never conducted old growth surveys or even used the criteria during stand examinations for projects. When conservation groups pointed out existing old growth they had identified through their inventories or discovered new old growth sites in field surveys prompted by proposed projects, District staff routinely denied the validity of these surveys without conducting surveys or compiling data on their own. Many projects in the Southern Appalachians have had units removed or altered because conservation groups have made a very solid case that these stands are indeed existing old growth under R8 Old Growth Guidance criteria. Countless hours of Forest Service staff time has been wasted designing projects that include old growth because District staff working on projects do not do due diligence to document existing old growth or consider the implications of harvesting old growth. The Forest Service has had to significantly modify numerous project plans when they are caught with inadequate environmental analysis. However, other old growth stands have gone forward toward regeneration harvest even when District staff acknowledge that the stands meet R8 criteria for existing old growth. Extremely rare and valuable old growth sites remain under threat from Forest Service projects.

At the Plan level, Forests have not entirely ignored the old growth issue. Forest Plans in Region 8 have designated old growth networks. However, these networks consist of lands that would be unsuitable for timber management (designated Wilderness, Wilderness Study Areas, Roadless Areas) or are inaccessible. These areas would make a satisfactory start for an old growth network, but known existing old growth sites identified by the public are ignored, and mature forest almost meeting old growth criteria is ignored. The Forests themselves have done very little old growth surveys. The exception is Jefferson National Forest where old growth surveys conducted by the USFS as a part of the Southern Appalachian Assessment actually informed the Jefferson National Forest Plan. Other national forests in Region 8 have treated old growth surveys as something to be avoided. National Forest plans, including the recently completed Forest Plan for the Nantahala and Pisgah National Forests, have also played a shell game with

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<sup>1</sup> U.S. Forest Serv. Region 8, Guidance for Conserving and Restoring Old-Growth Forest Communities on National Forests in the Southern Region (1997).

old growth, treating it as something they agree to designate during forest planning but without lasting commitment. An old growth network was set up for Nantahala-Pisgah National Forests as a part of a major plan amendment in 1994 at the direction of the Forest Service Chief to resolve a Plan appeal based on how the management plan treated old growth, among other issues. This old growth network served as the basis for old growth networks required by the Region 8 Old Growth Guidance. This old growth network on Nantahala-Pisgah National Forest was seen as tangible progress in actually establishing a viable and long-term old growth network. However, this “network” was retooled in the new Nantahala-Pisgah Forest Plan issued in 2023. Unsuitable land, protected by other designations (wilderness, roadless, other designations, and inoperable lands), were left in the old growth network. Portions of the old growth network that were seen as potential timber projects, including known existing old growth that fully meets R8 old growth criteria were taken out of the old growth network and put in the timber base. Old growth designation means nothing without a long term perspective. This long term perspective was ignored in the old growth shell game demonstrated in the Nantahala-Pisgah Plan.

The Old Growth Guidance was a landmark advancement in old growth management. It approaches the old growth issue from a scientific standpoint while also identifying the many social and cultural as well as scientific values inherent in old growth forests. It lays out reasonable criteria for evaluating existing old growth in the field and designing an old growth network that provides for long term recovery of old growth. However, it assumes that its intent will be carried out rather than requiring anything, leaving large discretion to local managers. It ignored a cultural attitude by some within the agency that doesn't recognize the value and importance of old growth. It ignores the economic dynamics that drive timber and commodity production over other forest values. And it ignored the tendency for responsibilities not to be met unless there is a requirement for them to be met. Because of the immense discretion to Forest Service staff in implementing the R8 Old Growth Guidance, it has lacked teeth and has failed in its promise to secure and restore old growth in Region 8.

Thankfully, there has been much progress on the old growth issue over the decades. Attitudes have changed – this proposed nation-wide amendment to provide direction for mature and old growth forest would not have been possible in earlier periods of USFS history. The value of old growth is becoming more generally recognized. Old growth as a major factor for carbon sequestration and storage is generally recognized in the scientific community. This proposed amendment could play a major role in securing old growth on our national forests and in advancing ecological integrity as a basis for management and restoration. The proposed direction is a good start for this direction. However, to provide meaningful direction that will actually protect existing old growth forest and assure that future old growth is adequately planned for requires refinements and structural changes in the current draft.

The proposed direction leaves much to the discretion of local managers. The need for flexibility is understandable. However, unless discretion is properly bounded by the intent of the direction, it invites abuse. Additionally, the Planning Rule provides an excellent basis in ecological integrity for old growth direction. However, the direction needs clear links between proposed new plan components and maintenance and restoration of ecological integrity. Lastly, the direction relies too heavily on identifying areas where old growth guidelines will apply. This approach ignores a number of lessons that should have been learned by now:

- 1) Relying on old growth reserves invites a binary management where old growth values are valued in portions of the forest but not in others. It also invites identification of areas where management is already constrained through designation or inaccessibility. However, old growth and recovering old growth are not confined to these areas or even necessarily best represented within these areas. This binary approach fails as a comprehensive approach for old growth planning.
- 2) Especially in the east but throughout the national forest system, there is the need for restoration of old growth and broader ecological restoration. Cordoning off areas would ultimately mean that these areas might receive a focus on ecological integrity while the rest of the forest experiences business as usual. The Planning Rule calls for a primary focus on ecological integrity on all lands.
- 3) Old growth and recovering old growth is not confined to areas of the forest that can be easily identified in prioritized “areas for the retention and promotion of old growth forest conditions”. Particularly in the east but in other areas as well, remaining old growth forms a patchwork across the landscape, representing where areas were inaccessible or unprofitable for logging or other quirks of history allowed old growth to remain. This patchwork is a beneficial asset for restoration of ecological integrity. Remnants of old growth throughout the forest become references and building blocks on which restoration can build.

Calling for identifying areas of the forest where proposed plan components will apply does not adequately provide for current and future old growth. Instead, the proposed direction should identify the conditions that call for guidelines wherever those conditions exist forest wide.

There are other specific changes and suggestions recommended in comments submitted by the Southern Environmental Law Center (SELC), which I support. The SELC comments embody the experience of SELC and other conservation groups that have worked extensively on old growth issues for decades. The suggestions in the SELC comments would make the proposed amendment practicable and well defined. I strongly endorse the SELC comments and urge you to adopt final direction consistent with the SELC suggestions.

Sincerely,

Hugh Irwin

Landscape Conservation Planner, Retired