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Comments: September 20, 2024

To: Jennifer McRae

United States Forest Service 1400 Independence Ave. SW Washington, DC 20250-1104

RE: Project 65356: Comment on Draft EIS to amend 128 land management plans for units of the National Forest System 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

Submitted via:

<https://cara.fs2c.usda.gov/Public/CommentInput?Project=65356> cc: Jennifer McRae at SM.FS.NFSWONGA@usda.gov

United States Forest Service and Ms. McRae:

As you know, West Virginia is the third most forested state in the U.S. with 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 draft Environmental Impact Statement (EIS) prepared regarding the proposal to amend all 128 forest plans for consistent direction regarding older, mature, and old growth forest conditions. We are joined in these comments by Christians for the Mountains, The Downstream Project, Eight Rivers Council, Friends of the Cheat, Greenbrier River Watershed Association, Mon Valley Green Space Coalition, Speak for the Trees Too, WV Citizens Action Group, WV Environmental Council, and WV Highlands Conservancy. Attached to the comment is the list of 930 individuals that support clear protections for older and old growth trees, and the additional 186 comments that some of those folks offered.

WV Rivers has advocated for 34 years for clean water for all, and for reasonable management and safeguards for our waterways and public lands. WV Rivers, the co- signing groups, and partners work locally, regionally, and statewide to promote and encourage policies for clean rivers and waterways. We support policies to conserve and protect our federal, state, and local public lands. Climate change, including more intensive precipitation events and warming temperatures, are a threat to forests, wildlife, ecosystems, and human health. Healthy and ecologically diverse forests in our national public lands like the MNF help mitigate the effects of our warming

climate, and are essential to healthy waters. Healthy forests help mitigate the impacts of rising temperature and climate change. WV Rivers strongly supports science-based policy to determine forest management.

Preservation and enhancement of our older trees, stands, and older/old growth forests provide proven carbon storage and proven benefits to water and forest ecosystems. 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. WV Rivers also commented extensively February 2, 2024, about the scope of the EIS; comments are located [HERE](#); the letter ID is 65356-5590-4822. 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 Forests Plans<sup>1</sup> to address older, mature, and old growth issues.

Generally, we support a uniform approach, at least as to setting overall guidelines and procedures, to get these protections for mature/older/old growth trees implemented as efficiently and quickly as possible. 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. With that said, we do believe that the draft EIS should be further revised as set forth in the remainder of this comment; and that Alternative 2 should be revised prior to being accepted.

We support the decision in the draft EIS to refrain from using a single definition of "old growth" in all Forest Plans.

In our previous two comments, we objected to the Forest Service's stated intent to develop one definition of "old growth." We emphasized the difficulties and complexities of trying to create one definition for 'old growth' because of variations

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<sup>1</sup> We do understand that as a result of the draft EIS study, 1 Forest and 6 grasslands were omitted from this proposed amendment to all Forest Plans. The unique aspects of those lands demonstrated how a one definition approach simply would not work. However, we will continue to use phrasing such as 'amending all Forest Plans' for convenience.

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among forests as to species type, varying longevity, and the timing of the last human disturbance of the forests.<sup>2</sup> The Monongahela National Forest Plan (2006, revised 2011, Appendix B) also discusses "Old Growth", and USFS Region 8, provides "Guidance for Conserving and Restoring Old-Growth Forest Communities on National Forests in the Southern Region" 1997. Prior research by USFS identified 35 old-growth forest types across the southeastern U.S.,<sup>3</sup> highlighting the importance of accounting for regional variation in Forest Plan development.

The draft EIS incorporated our concerns, and rejected a uniform, one-definition-fits-all- forests description of 'old growth.' As stated in the draft EIS, adopting the reasons we set forth against a one definition approach:

At the same time, the proposed amendment recognizes that there is no single management prescription or definition that applies to all of the forest types across the National Forest System. Old-growth characteristics differ by ecosystem and species. Similarly, threats to old-growth forests differ in different regions and geographies. For these reasons, the plan amendment does not propose a single national old-growth definition. Instead, it directs the application of plan components based on local definitions, or regional definitions where the underlying plan is incomplete. (page S-1).

Similar statements are made throughout the EIS. We believe that setting procedures which include the aspects unique to that individual forest will provide more intelligent and sensitive management of mature and older/old trees, areas, and forests - and ultimately result in more areas protected than would occur under a one definition procedure.

The decision not to have one definition permits the unique characteristics of the MNF (and other Appalachian forests and Eastern Forests generally) to guide the management and enhancement of mature and older/old growth areas in the MNF while at the same time having national guidelines on some matters to deal with deficiencies in the MNF Forest Plan.

The draft EIS finds 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" (Draft EIS, pages S-4, 2). We believe that past and current harvesting practices are a larger threat to identifying and preserving old growth in Eastern Forests, and in the MNF, than the statements in the draft EIS seems to imply. In support of this point, Spies (2004) also recognized regional differences in the role of timber harvest in limiting old-growth forest characteristics. Because of these past and current harvesting practices, mature and old growth in the MNF may be fragmented and not easily identified. We addressed this concern in our August 15, 2022 and February 15, 2024 comments, but want to emphasize these points:

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2 Spies, T. A. 2004. Ecological Concepts and Diversity of Old-Growth Forests." *Journal of Forestry* 102(3): 14-20

3 White, D.L., and F.T. Lloyd. 1994. Defining old-growth: implications for management. Paper presented at the Eighth Biennial Southern Silvicultural Research Conference, Auburn, AL, Nov. 1-3, 1994.

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Although there was statewide clearcutting in West Virginia (1880-1910), not every tree was harvested. A stand considered by the Forest Service in the MNF as not mature or old growth may contain areas of trees that easily meet or exceed the age characteristics associated with old growth' for that species. Therefore, projects that include clear cutting of a stand or larger area may result in cutting the very trees and small areas most likely to have the most carbon storage. The fact that the draft EIS does not have one definition of old growth permits the MNF to consider these unique past and present management practices.

However, the MNF currently assumes that old growth "currently represents a minimal part, comprising less than one percent of the entire Forest."<sup>4</sup> This may be too narrow of a definition that can be corrected to revise age

stand classifications in the MNF and other Forests with some national guidelines. The MNF definition seems to stem from the MNF Forest Plan 3-tiered classification of forest stands as "early," "mature," and "late" - the latter of which equals 'old growth.' This definition seems to imply that old growth will be near-death trees and a rare occurrence. We believe this constitutes an 'old-school' forest management practice and should be updated in the draft EIS. Therefore, the draft EIS does need some guidelines applied to all forests to deal with definitional problems in an individual Forest.

The draft EIS should be revised to require for all Forest Plans:

\* Each Forest, in understanding its unique situation regarding older/old growth trees, area, and forest, should be required to identify older/old trees and growth at a scale less than stand - and provide for protection of those trees/areas even if the stand (or larger) is otherwise considered appropriate for clear cutting or other significant timber harvest (commercial or otherwise).

\* Each Forest, upon receiving information from local residents, Tribal interests, or other local groups identifying local older/old trees and areas, each Forest should be required to 'ground truth' the report; obtain accurate data; and if substantiated remove and buffer those trees/areas from any proposed cut.

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4 MNF Forest Plan 2006 (Amended 2011), Appendix B.  
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The MNF (and potentially other Forests as well) also has an interesting development as a result of the great cut (1880-1910). Historically, red spruce dominated the West Virginia Appalachian Highlands. The almost complete clear cut of the State (1880-1910) and subsequent wildfires decimated the red spruce population. What remained of the red spruce population is highly fragmented, lacking the connectivity necessary for a thriving red spruce population. Hardwood species generally took over the former Red Spruce areas - and have been encouraged thereafter for their value in timbering.

The MNF (along with three other Appalachian Highlands Forests) is preparing an EA on a proposed Red Spruce Restoration Project, Project number 66564). (Scoping Comments closed September 5, 2024). The goal of that project is to provide connectivity among the now highly fragmented remnants of red spruce and to return the red spruce to as much of its historic range as practicable. A full or near full restoration of red spruce in the MNF over time potentially could provide as much (or more) climate enhancing benefits than simply protecting the existing trees and permitting them to develop into old growth.<sup>5</sup> The draft EIS should include provisions and criteria for decisionmaking that requires each Forest, as it considers old growth, also consider whether any restoration of traditional and historic species is warranted, and which direction of forest management will be the most beneficial to preserving old growth forest, storing carbon, providing for healthy forest and water quality, and mitigating climate change impacts.

We believe that Alternative 2 should be revised prior to being accepted in the Final EIS and the Final Action

The Forest Service draft EIS has Alternative 2 as its preferred option. Alternatives 1 and 4 provide NO protections for mature/older/old growth trees and forests and should be rejected. Alternative 3 - restricting all commercial timbering in old growth areas - is appealing, but there may be a situation in which very limited timbering might be necessary.

Alternative 2 however is currently not restrictive enough to assure permanent safeguards for mature/older/old growth forests. Terms like "Proactive Stewardship" are unclear and described in a way that could lead to timbering that actually strips away the older/older growth characteristics. Timbering in older/old growth areas should be only for ecological, forest, and water quality reasons - or to encourage restoration of a native tree species - with an economic benefit NOT calculated in any justification for timbering. The EIS should specifically state timbering is only a last resort. Clear cutting and steep slope timbering should be prohibited in any older/old growth area. Where timbering is absolutely necessary, we hope any limited timbering will utilize an uneven-aged system, not clearcutting or some other even-aged system.

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5 This possible outcome obviously would require extensive study and research.

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The Forest Service nationwide has recognized waterways as free flowing, possessing remarkable values, and eligible for designation under the Wild and Scenic Rivers Act. The Alternative ultimately adopted by the Forest Service should provide clear guidelines as to the benefits to designated and eligible waterways by protecting mature/older/old growth forests - and the safeguards and procedures to be followed for such waterways for any mature/older/old growth project in proximity to a Wild and Scenic River eligible waterway.

If revised to provide strong protections for older/old growth trees and areas - and the surrounding forest and aquatic ecosystems - Alternative 2 would be acceptable. Otherwise, we support Alternative 3.

Conclusion

In summary, WV Rivers appreciates the opportunity to comment on the draft EIS for amending all Forest Plans to ensure protection for our older/mature/old growth trees and forests. We recognize that the Forest Service performed a careful and detailed study involved in the draft EIS. We are pleased that the Forest Service has moved away from the idea of one definition for older/old growth across all Forests. This decision allows Eastern Forests (including the MNF) to consider the unique Forest (and sadly clearcutting) histories when determining old growth management. However, deficiencies in current Forest Plans can be corrected by some nationwide guidelines. We believe that the draft EIS should be revised as set out in this letter - especially making guidelines for managing any decision-making regarding balancing other climate mitigation, habitat, and water protection with current mature/older/old growth protections. Further, while generally agreeing with the Forest Service's selection of alternative 2, we do believe the language and definitions should be tightened and made clearer. Alternative 2 should be clear that management of mature/older/old is not tied to any commercial timbering - and that any limited timbering will utilize an uneven-aged system, not clearcutting or some other even-aged system and permitted only when absolutely necessary and when there are strong ecological or forests reasons to do so (not merely or primarily economic reasons).

We hope the policy and the revised EIS and Alternative 2 for the proposal, will be defined strictly and inclusive

enough to include even 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 - with the most appropriate species to a Forest; as well as provide the carbon storage benefits set forth in the EO.

Best regards,

[signed by 12 representatives of different organizations

ATTACHMENT WVRC comment petition Draft EIS old growth.pdf includes copies of the letter text above, 930 names/signors and contact information (in addition to the 12 original signors) as well as the following Form Plus text

I support actions in Alternative 1. Old growth trees should never be harvested for financial gain. They are too important to the ecosystems they are in. Alternative 2 should be clear that management of mature/older/old is not tied to any commercial timbering -- and that any limited timbering will not occur on steep slopes at all, utilize an uneven-aged system, not clearcutting or some other even-aged system, and be permitted only when absolutely necessary and when there strong ecological or forests reasons to do so (not merely or primarily economic reasons)

Because of the West Virginia great clearcut, we have only limited areas that were not harvested by 1920 - and therefore limited 'old' growth. The decision to consider conditions specific to each forest will benefit our Mon Forest and hopefully protect more areas in our crown jewel public land. We also generally support 'Alternative 2,' which provides protections for older and old growth but, unfortunately, still permits some commercial timbering in old-growth areas.

We think the Forest Service should revise its draft EIS and Alternative 2 to provide the following: Alternative 2 should be clear that management of mature/older/old is not tied to any commercial timbering -- and that any limited timbering will not occur on steep slopes at all, utilize an uneven-aged system, not clearcutting or some other even-aged system, and be permitted only when absolutely necessary and when there strong ecological or forests reasons to do so (not merely or primarily economic reasons).

Each

Old growth forests, such as we have in West Virginia, are so important to us for environmental reasons, for historical reasons, for reasons of recreation (e.g., hiking, hiking, and hiking!), and for the important waterways that traverse them. Please do all that you can do to protect these precious old growth forests from such insidious things as logging, mining, drilling, and new highway construction. West Virginia is blessed to have these old growth forests. And they most assuredly need to be protected because they are such an important part of our Mountain State of West Virginia

Dear US Forest Service, Please leave the mature trees in WV forests alone. Please do not clear cut in areas where there are any mature trees. Our world needs trees now as never before; trees are the best way to purify the air, lower the temperature, ensure rainfall and keep our soil healthy, secure and our streams and rivers healthy and vibrant. Trees are the most vital living beings on our planet. Please protect them and keep logging interests well away from any mature trees.

Old growth trees are mature trees - they don't have to be ancient, but to have achieved their mature height and girth. Once this is achieved, please let them continue to grow. Thank you, Best Wishes

Don't forget about cutting back our carbon footprint. (and all that entails, including reduce, refuse, reuse, recycle, compost, when you can safely, & living as simply as possible, cutting back on excess, downsizing, etc . . .). I'm trying, but I think we could do more to encourage others around the world. Including setting a good example ourselves

West Virginia is relying on tourism more and more. Our old growth forests are part of our appeal. People make special trips just to see large old trees. Who would visit CA forests without their Redwood trees? We need to preserve our old growth trees and succeed in keeping the forests healthy

As a native of West Virginia and a regular visitor to the Monongahela National Forest, I wish to thank the US Forest Service for its commitment to protect older growth in areas that were clearcut before 1920. I am especially concerned about flooding that occurs in the steep ravines after clearcutting takes place and I strongly support measures to eliminate clearcutting in erosion prone areas. I am also concerned about West Virginia's history of ignoring local residents' efforts to provide input on decisions that affect the public, and I believe the US Forest Service should implement WV Rivers' suggestion to 'ground truth' reports received from the public. West Virginia's mountains and waters are a haven from the urban areas to the east, and should be kept as pristine as possible

I do not support Forest Service's 'alternative 2' plan, as the Forest Service still sees trees, old-growth, or otherwise as mainly a commodity. My protest is based in part of the way the Forest Service turns a blind eye to the increase in private timbering that has escalated with this state's current administration (WV is 3rd most timbered state). With global warming, we may not have the chance of a second growth rebound that happened after the early 1900's forest devastation. Even one old-growth tree has a great impact on the health of a forest and biodiversity. Leave well enough alone!

Our National Forest lands are my family's most favorite habitats to visit in this state and critical to animals and people alike. Please revise and clarify wording around this proposal to ensure our older trees are protected, even those that aren't part of a larger stand. This is how we will ensure more true old growth forest areas in the future.

Let's not strip our lands for economic benefit. If anything, the new tourism reports show that the value in our lands comes from preserving them for people's enjoyment of the outdoors rather than harvesting materials. That's the economic future of our state

I agree with the position taken by the West Virginia Rivers Coalition that states: We also generally support 'Alternative 2,' which provides protections for older and old growth but, unfortunately, still permits some commercial timbering in old-growth areas.

We think the Forest Service should revise its draft EIS and Alternative 2 to provide the following: Alternative 2 should be clear that management of mature/older/old is not tied to any commercial timbering -- and that any limited timbering will not occur on steep slopes at all, utilize an uneven-aged system, not clearcutting or some other even-aged system, and be permitted only when absolutely necessary and when there strong ecological or forests reasons to do so (not merely or primarily economic reasons). Each Forest, in understanding its unique situation regarding older/old-growth trees, area, and forest, should be required to identify older/old trees and growth at a scale less than a 'stand' -- and provide for the protection

Of particular importance is the well-known issue of inaccurate stand maps. Generally speaking and obviously with exceptions, they are gross simplifications, spatially, and often inaccurate in terms of the ages, \*plural\*, ages of the trees within the stands (even now they are establishing new age classes within certain stands). Yes, we all know that the Mon National Forest was cut heavily but it wasn't silviculturally clearcut but rather 'economically' 'clearcut', which is to say very little of any consistent meaning. The forest was \*highgraded\* by greedy, ignorant, short-sighted industrialists. The result is that there are many, many remnant trees, trees that survived even the awful, destructive (and often intentional) fires that sometime (but not on every acre) followed, and thus the maps are partially useful \*at best\*. Get better data before charging off to log in the name of forest health and the desperate need to adjust age classes

For once, I would love to see the federal government take a long view, like seven generations view. I support the prioritization of old growth forests in order to protect our planet for the grandchildren of my grandchildren. Sedimentation is one of the biggest threats to clean water in this country. Perhaps if we took heed of what nature needs to survive, nature will continue to provide us with what we need to survive. And I am 100% certain that enormous boards of lumber does not fall under what we need

Areas of mature old growth trees found in the Monongahela National Forest should be identified, protected and added to the national Old Growth Network. The Gaudineer Scenic Area in the Monongahela National Forest has been designated and added to the Old Growth Forest Network.

I hope the revised EIS and revised Alternative 2 will be strictly defined and inclusive enough to include even 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

I urge you to promulgate a rule shielding all remaining old-growth forests in Forest Service custody, and thereby comply with Executive Order 14072 concerning old-growth forests, as well as the agency's long-deferred ecological responsibilities. The objectives of the EO, as well as the Forest Service's portion of staunching the global ecological crisis, can only be fulfilled through a permanent moratorium on logging of old-growth forests