

Data Submitted (UTC 11): 9/20/2024 4:00:00 AM

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Comments: attached find a letter commenting on the dEIS for NOGA from Speak For The Trees Too and Friends of Blackwater

Submitted by email and on-line September 20, 2024 Linda Walker Director of Ecosystem Management

Coordination United States Forest Service 201 14th Street SW Mailstop 1108 Washington, DC 20250-

1124 linda.walker@usda.gov RE: Comments on dEIS for Land Management Plan Direction for Old-Growth Forest

Conditions Across the National Forest System (NOGA) We appreciate the opportunity to comment on the Forest

Service's proposal for Land Management Plan Direction for Old-Growth Forest Conditions Across the National

Forest System. Our comments will take examples from the areas we know best, the eastern National Forests

and, because we are within the Forest, in particular the Monongahela National Forest. However, our comments

have general applicability for National Forest management across the country. Setting Targets for Conservation

and Stewardship of Old Growth Conditions Under the Proposed Action (PA), identification of places for place-

based conservation and stewardship would be assigned to forest units for future implementation.. These

requirements should be modified to set a goal for each forest to identify at least the oldest 30% of each forest's

land base for old growth stewardship. Early identification of areas for old growth stewardship would prevent the

continued loss of old growth to forest management actions focused on other goals. Furthermore we ask that

annual targets be set for field identification of old growth so that the oldest 30% of each forest can be more

accurately identified. Forest units should identify areas to be managed for old growth stewardship The

approximately 200 regional definitions identified in the Forest Service April 2023 (revised May 2024) inventory

and definitions of old growth appear appropriate for a nation-wide inventory but are unworkable for place-based

on-the-ground management. As noted by many authors and acknowledged by the Forest Service, defining old

growth is fraught with difficulty because of differing views of what old growth is and because the wide diversity of

physiographic and ecological conditions in the country. While defining old growth is problematic, it is important

that Forest units have methods for identifying where old growth conditions exist through yet-to-be-developed

operational criteria. In the mean time, each forest should identify the oldest 30% of its land base for a beginning

basis for old growth stewardship. In our on-the-ground experience we have found that in some forests existing

approaches to old growth stewardship appear to exclude stands that one would likely be consider old growth. In

the Monongahela N.F. we are aware of stands that are dominated by northern hardwoods 30 to 65 inches DBH

and contain hemlocks 30 to 40 inches DBH (e.g. Figure 1). These mapped trees are 120 to 260

years old and include the 4th largest red oak and 3rd largest hemlock recorded in West Virginia, yet are not

identified by the Forest Service as old growth. It appears that some forest identification criteria would exclude old

stands from qualifying as old growth. This further supports the need for an initial identification of the oldest 30%

of each forest as areas in which to focus old growth stewardship. [Figure 1 - mapped image marking "Large Trees

Measured in and near Stand R45, updated"] Reasons for cutting trees in stands with old growth conditions We

believe that cutting of trees in older stands should be limited to ecological goals tied to the maintenance and

increase of old growth conditions. Commercial harvest of older trees should not be allowed in old growth

conditions and the harvest of smaller/younger trees in older stands should be limited to areas where it is

necessary to protect or maintain old growth conditions. We do not believe that mesophication is a reason for

cutting older/larger trees. Mesophication appears to be an issue of oak-hickory management and little related to

maintenance or expansion of old growth conditions. Furthermore, by fostering moister conditions, mesophication

appears to be making our forest more resistant to climate change and, therefore, something to be welcomed in

most circumstances. If oak-hickory stands need to be managed to enhance regeneration, it is the younger trees

that should be cut, not the older trees. Proposed red spruce restoration at mid-Appalachian high elevations is an

important and admirable goal but need not be done at the cost of old growth conditions. If red spruce

regeneration and growth stimulation is identified as a management goal, the stands for such management should

not be stands with old growth conditions. The forest communities and species that use red spruce forests, e.g.

the northern flying squirrel, also use older hardwoods, particularly those mixed with conifers such as eastern

hemlock. Disturbance of older forests by logging in the name of red spruce restoration would damage the hyphal mat that produces the fungi that flying squirrels depend on. Those fungal soil systems that support many animal, insect and plant species can take decades to recover from logging disturbance. There are vast tracts of younger forest that can be targeted for red spruce restoration, and older hardwoods should be avoided in those restorations.

Approach for Identifying Old Growth Conservation and Stewardship Areas

Our proposed approach to a first cut at identifying areas for old growth conservation and stewardship, can be implemented immediately by forest units, does not require complex and inconsistent regional and forest type dependent definitions, and uses existing data collected by each Forest. Our proposal is that at least the oldest 30% of stands in each forest be designated as Old Growth Conservation and Stewardship Area's. Our analysis of 4 eastern National Forest's Field Survey Vegetation (FSveg) data on stand age indicates that such a criteria would protect most stands that have been identified as old enough to plausibly be old growth. This approach allows for immediate mapping of conservation and stewardship areas (e.g. Figure 2) and on-the-ground implementation of a proposed action. It avoids the need for controversial definitions of old growth. While defining desired characteristics is important for monitoring and stewardship, initial implementation of the proposed action should not be dependent on unavoidably controversial definitions of old growth.

[Figure 2 - Mapped image showing "The oldest 30% of stands in the Monongahela National Forest, highlighted in yellow. Based on FSveg data for the Forest"]

This proposed approach would complement, but not duplicate, areas already set aside for conservation purposes, such as research natural areas, wilderness areas or roadless areas (Figure 3). It differs from those congressionally and administratively set aside areas in that this criteria focuses on the oldest 30% of each Forest, insuring that adequate lands are identified for stewardship of old growth values. Nor does it preclude management but focuses management in these areas on enhancing old growth conditions.

[Figure 3 - Figure 3: Conceptual diagram of overlap between existing conservation areas and Old Growth Conservation and Stewardship Areas.]

Our proposal uses existing Forest data on stand age. While that data has inconsistencies in the way it is collected between Forests, one might assume that the relative stand age within each Forest is correctly identified. Therefore, by allocating the oldest 30% of stands to old growth conservation and stewardship one can be assured that the oldest stands are properly managed.

Monitoring of old growth conservation and stewardship

While the 200 regional definitions of old growth in April 2023 may not be suitable for on-the-ground implementation of place-based conservation and stewardship, those definitions are good at identifying some of the characteristics that are desirable goals for old growth conservation and stewardship. For example, emphasis on large dead snags, or a predominance of large older trees or downed dead wood can be set as management goals for Old Growth Conservation And Stewardship Areas. Unfortunately current data sets are relatively weak in characterizing stands old growth characteristics or are not at a scale that allows place-based management of old growth. Going forward, FSveg, FIA and other data collection methods should be reviewed and revised to ensure that data are collected with a renewed focus on ecological values and old growth characteristics, not simply timber values. That will enable progress on enhancement and stewardship of old growth. In particular, given that "stand age" is an important factor in identifying areas for old growth stewardship it is important that going forward information collected in the FIA and FSveg programs on stand age is standardized across the Forests. Finally, the sampling density in both these data programs needs to be examined and the data only be used at appropriate scales. For example, FIA data plots are small enough that they are likely to overlook "rare events", i.e. large old trees. As noted by Gray et al. (2023) For example, a FIA-sized plot would not detect a large tree in a stand with 20 large trees per ha ~ 25% of the time, while a plot of twice the area would not detect a large tree in the same stand 5% of the time (Williams et al., 2001). Williams et al. (2001) recommend that classifications that depend on large areas or rare elements be avoided using inventory plots. Even the higher sampling density, stand-focused, FSveg data sets are fraught with bias because of the difficulty in detection of rare events in a spacially sparse sampling program. Bias in the way "stand age" is determined and bias due to the difficulty in detecting rare events, i.e. large old trees, makes it imperative that sampling methodologies, biases and sampling goals be carefully examined and made more suitable for detecting rare "events" such as large old trees and recording non-traditional forest values such as fungi, T&E species habitats, carbon stores and other old growth characteristics.

Summary: Prompt action by forest units to identify areas for old growth conservation and stewardship is needed. A review of the Forest Service regional definitions of April 2023 finds that those definitions are unwieldy for place-based implementation and may overlook some old growth. We propose that

forest units be given a target to establishing at least the oldest 30% of each Forest as Old Growth Conservation and Stewardship Areas. Neither mesophication nor red spruce restoration should be used as reasons for cutting of stands with old growth conditions. We support this initiative to better conserve and steward our older forest. We believe that alternative 2 would be acceptable if stronger protections against commercial logging, particularly those involving even-age methods were incorporated. Also any cutting of trees on stands with old growth conditions should be limited to smaller/younger trees. As we stated earlier, any management in stands with old growth conditions should be focused on, and justified by, conservation and stewardship of old growth conditions. Thank you for the opportunity to comment on the dEIS. We hope that you will find our comments helpful in the conservation and stewardship of old growth. Sincerely, John Coleman for Speak For The Trees Too, WVSpeak4Trees2@gmail.org and with support from Friends of Blackwater Canyon Judy Rodd, Director, info@saveblackwater.org ATTACHMENT: NOGA_dEIS_Speak4Trees2+FOB_2024-09-20_fnl.pdf- this is the content that is coded in text box, it was only included as an attachment