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February 1, 2024

U.S. Forest Service  
Director, Ecosystem Management Coordination  
201 14th Street SW, Mailstop 1108  
Washington, DC 20250-1124

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

**RE: Land Management Plan Direction for Old-Growth Forest Conditions Across the National Forest System**

Dear Tom Vilsack, Secretary of Agriculture:

The Arizona Game and Fish Department (Department) appreciates the opportunity to provide comments to the U.S. Forest Services (USFS) during the scoping period for the preliminary proposed action - Land Management Plan (LMP) Direction for Old-Growth Forest Conditions Across the National Forest System (NFS). The Department understands the USFS is preparing an environmental impact statement (EIS) to evaluate the effects of amending 128 LMPs to include direction to conserve and steward existing and recruit future old-growth forest conditions and to monitor their condition. The LMPs would include the following National Forests (NF) in Arizona: Apache-Sitgreaves, Coconino, Coronado, Kaibab, Prescott, and Tonto. For your reference, the Department provided a comment letter dated July 20, 2023 on the USFS Advance Notice of Proposed Rulemaking for Forest Service Functions that informed this preliminary proposed action, and is still relevant to this proposed action.

Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission has jurisdictional authority and public trust responsibilities to conserve and protect the state fish and wildlife resources. In addition, the Department manages threatened and endangered species through authorities of Section 6 of the Endangered Species Act and the Department's Section 10(a)(1)(A) permit. It is the mission of the Department to conserve and protect Arizona's diverse fish and wildlife resources and manage for safe, compatible outdoor recreation opportunities for current and future generations. For your consideration, the Department provides the following comments based on the agency's statutory authorities, public trust responsibilities, and special expertise related to wildlife resources and recreation.

**Consistent Application of MOG Management:**

Broadly, the Department recommends plans include the retention of both mature and old growth (MOG) trees when appropriate for the geographic region, and refers to MOG collectively herein.

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Based on the information provided, it is unclear how the USFS intends to ensure the consistent and standardized application of MOG management across LMPs and Districts, and forest types, during development of amendments and during implementation. It is also unclear how the USFS intends to balance broad USFS and Federal initiatives such as the Confronting The Wildfire Crisis initiative, and Executive memo regarding Guidance for Federal Departments and Agencies on Ecological Connectivity and Wildlife Corridors. The Department recommends the USFS provide clear guidance to operationalize and implement an adaptive management framework including mechanisms for standardization, monitoring, reporting, and implementation to ensure consistency across different temporal and spatial scales (e.g., forests, Districts and watersheds etc). As an example in Arizona, the USFS has committed to implementing adaptive management including monitoring efforts and standardized reporting in the Four Forest Restoration Initiative (4FRI) 2nd Rim Country EIS however, these challenges remain. Additional opportunities exist within rule and policy to assist Forests and Districts with these challenges and the Department recommends the USFS clearly define the pathway to operationalize adaptive management of MOG on NFS managed lands. Although adaptive management is mentioned in the Federal Register, it is unclear what the basic components are and how the USFS will support those efforts.

#### **Types of Forests Covered by MOG Management:**

The Department recommends including detailed information regarding the specific types of forests to which the MOG management provisions will apply. Understanding the criteria for identifying and defining MOG forests is essential for effective implementation and will help in tailoring management strategies to the unique characteristics of different forest types. The Department points to 4FRI as a template to inform and guide MOG management. Defining MOG management in 4FRI was a stakeholder driven effort, in coordination with the USFS, that resulted in the [4FRI Old Growth Protection & Large Tree Retention Strategy](#)<sup>1</sup>. Careful consideration of forest types, and the flexibility at the local level is needed to ensure the definition of MOG is properly applied, and that efforts of decades long stakeholder driven efforts are not lost. Additionally, undertaking this action places additional administrative burden on USFS personnel and contributing stakeholders as it relates to other priorities the USFS is attempting to implement. Direction for MOG management could be included in policy direction versus revision of LMP's.

#### **Engagement with State Wildlife Agencies:**

Based on the information provided, it is unclear how the USFS plans to engage with State wildlife agencies throughout the development and implementation of MOG management. The Department requests the USFS clearly identify and outline a strategy for coordination and collaboration with State wildlife agencies during development and implementation. Collaboration with State wildlife agencies is essential to ensure MOG management recognizes State wildlife agency jurisdictional authorities and incorporates State wildlife agency priorities and expertise of State wildlife agency staff. The Department recommends the USFS establish a structured framework for communication and collaboration with State agencies and add specific language in rule to ensure proper coordination with State wildlife agencies.

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<sup>1</sup> [https://4fri.org/wp-content/uploads/2018/04/old\\_growth\\_protection-revised080812.pdf](https://4fri.org/wp-content/uploads/2018/04/old_growth_protection-revised080812.pdf). For details and other foundational and operational documents can be found at the 4FRI webpage at: <https://4fri.org/4fri-documents-2/>

Thank you for the opportunity to provide input on the LMP Direction for Old-Growth Forest Conditions Across the NFS. The Department looks forward to continued collaboration to ensure the success of MOG management. For further coordination, please contact Tracy C. Bazelman at [tbazelman@azgfd.gov](mailto:tbazelman@azgfd.gov) or 623-236-7513.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Luke Thompson', with a long horizontal flourish extending to the right.

Luke Thompson  
Branch Chief - Habitat, Evaluation, and Lands

AZGFD #M23-12274731