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Jennifer McRae
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RE: Hunt-Fish Comments on Draft Environmental Impact statement on guidance for old growth management on national forests

Submitted via comment portal: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>

Having reviewed the *Draft EIS for Amendments to LMPs to Address Old-Growth Forests Across the NFS* and the *Technical Guidance for Standardized Silvicultural Prescriptions for Managing Old-Growth Forests* provided by the United States Forest Service (USFS), the Arkansas Game and Fish Commission accepts the definitions, criteria, and management proposals established therein and supports the USFS's conservation and science based management of our diverse range of old growth forests. The Technical Guidance provided by the USFS regarding the management of old growth forests does an excellent job of illustrating the vast range of structural features, cultural impacts, ecosystem services, and compositions of these climax communities nation-wide. Along with these regional differences arises the need for a multi-faceted approach to their management that would be hindered by a solely preservationist management strategy. The use of a preservation based approach to certain old growth forested stands is still a valid tool where it is appropriate, but to restrict management of other old growth stands that do require some form of management could prove detrimental to the forested landscape as a whole. The use of prescribed fire, the eradication of invasive species, insect damage mitigation, as well as salvage operations and forest thinnings, among other treatments, can all be necessary to maintain old growth forest health and productivity.

The Arkansas Game and Fish Commission sought out third party forest certification in 2021 and since has adopted the forest management standards set by the Sustainable Forestry Initiative® (SFI) including the conservation and protection of old growth forests from conversion or any long term adverse impacts such as those created by climate change. Imbedded within our own SFI Manual are adaptation strategies for climate related effects including the increased likelihood of extreme weather events (flood, drought, and fire), the potential for an increase in damage from forest pests and diseases, and the potential for a combination of factors to lead to shifts in ranges for individual species. Forests are at their highest risk of damage from pests and diseases as the canopy closes and the trees shift from growing vigorously towards stagnation. Over time this phenomenon can lead to composition shifts, increased potential for stand replacing wildfire, the invasion of exotic species, and increased riparian erosion. For these reasons we affirm the USFS's plan for proactive, science based forest management to ensure our old growth forests are resilient and adaptable enough to withstand these external forces for generations to come.

Sincerely,

Brad Carner
Deputy Director

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The Arkansas Game and Fish Commission's mission is to conserve and enhance Arkansas's fish and wildlife and their habitats while promoting sustainable use, public understanding and support.