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October 11, 2024

Ms. Stephanie Miller  
U.S. Forest Service  
Assistant Director for Future Forest  
Denver Federal Center, Building 40  
Lakewood, CO 80215

Electronically submitted to:

<https://cara.fs2c.usda.gov/Public/CommentInput?project=Directives-4178>

**RE: USFS FSM 2470 Silvicultural Practices**

Dear U.S. Forest Service,

The Arizona Game and Fish Department (Department) appreciates the opportunity to review the U.S. Forest Service's (USFS) proposed updates to the Forest Service Manual (FSM) 2470, "Silvicultural Practices." This directive sets forth policy, responsibilities, and direction for aspects of silvicultural management on National Forest System managed lands. Proposed revisions include, but are not limited to, increased consideration of climate change throughout, added consideration of indigenous knowledge, and management practices for old-growth forests, aligned policy to include "foster health and resilience" of forests, added new definitions and modified existing definitions. This update is a separate but concurrent action to the USFS's Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System Draft Environmental Impact Statement (June 2024). In general, silvicultural practices are management activities that control the establishment, growth, composition, health, and quality of forested lands to achieve land management objectives. The use of prescribed fire and mechanical treatments are examples of silvicultural treatments.

Under Title 17 of the Arizona Revised Statutes, the Department, by and through the Arizona Game and Fish Commission (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.

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The directive replaced “Forest Service Activity Tracking System (FACTS)” with “the database of record.” The Department places a high priority on standardized tracking and reporting in FACTS. If system upgrades are planned the Department offers the following suggestions. System upgrades should be user-friendly and align with the operationalization of adaptive management. Upgrades should increase standardization of reporting and tracking requirements, have the ability to compare data with other Federal land management agency databases, and the ability to produce automated GIS maps from FACTS. The Department has found FACTS to be an important tool to communicate successes and increase Federal, State and local engagement.

FSM 2470.03 - Policy, outlines policy for prescribing, implementing, and monitoring silvicultural practices. Policy #9 states “Enter planned, accomplished, and completed activities into the database of record.” The Department recommends adding when treatment data should be entered by to standardize reporting.

In section 2471 – Silvicultural Examinations, Prescriptions, and Evaluations, FSM 2471.03 - Policy, #4 on page 22 states, “Base detailed prescriptions, upon current stand and desired conditions. Consider interdisciplinary input, including climate science, indigenous knowledge, and stewardship of old-growth forests.” The Department recommends adding consideration of State Wildlife Agency input to inform treatments for the benefit of wildlife. Input would allow for alignment with site-specific wildlife management and consistency with State Wildlife Action Plans.

Lastly, the Department recommends the directive prioritize snag retention as an important silvicultural practice. Snags are a vital part of a forest’s ecosystem that provides many benefits to wildlife and requires direct silvicultural oversight to maintain on the landscape.

Thank you for the opportunity to provide input on the FSM - Silvicultural Practices. For further coordination, please contact Tracy C. Bazelman at [tbazelman@azgfd.gov](mailto:tbazelman@azgfd.gov) or 623-236-7315.

Sincerely,



Callie Cavalcant  
Branch Chief - Habitat, Evaluation, Lands Branch

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