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Comments: RE: Hunt-Fish Comments on Draft Environmental Impact statement on guidance for old growth management on nationalforestsSubmitted 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 theTechnical Guidance for Standardized Silvicultural Prescriptions for Managing Old-Growth Forests provided by the United StatesForest Service (USFS), the Arkansas Game and Fish Commission accepts the definitions, criteria, and management proposalsestablished therein and supports the USFS 's conservation and science based management of our diverse range of old growthforests. The Technical Guidance provided by the USFS regarding the management of old growth forests does an excellent job ofillustrating the vast range of structural features, cultural impacts, ecosystem services, and compositions of these climaxcommunities nation-wide. Along with these regional differences arises the need for a multi-faceted approach to their managementthat would be hindered by a solely preservationist management strategy. The use of a preservation based approach to certain oldgrowth forested stands is still a valid tool where it is appropriate, but to restrict management of other old growth stands that dorequire some form of management could prove detrimental to the forested landscape as a whole. The use of prescribed fire , theeradication of invasive species, insect damage mitigation, as well as salvage operations and forest thinnings, among othertreatments, 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 theforest management standards set by"the Sustainable Forestry Initiative[reg] (SFI) including the conservation and protection of oldgrowth forests from conversion or any long term adverse impacts such as those created by climate change. Imbedded within ourown 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 acombination of factors to lead to shifts in ranges for individual species. Forests are at their highest risk of damage from pests anddiseases as the canopy closes and the trees shift from growing vigorously towards stagnation. Over time this phenomenon can leadto composition shifts, increased potential for stand replacing wildfire, the invasion of exotic species, and increased riparianerosion. For these reasons we affirm the USFS's plan for proactive, science based forest management to ensure our old growthforests are resilient and adaptable enough to withstand these external forces for generations to come.Sincerely,Brad CarnerDeputy DirectorATTACHMENT: AGFC Letter of Support - USFS Old Growth Forest Management.pdf- this is the content that is coded in text box, it was only included as an attachment