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Organization:

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Comments: August 30, 2022

Mr. Jamie Barbour

Assistant Director

Ecosystem Management Coordination

USDA Forest Service

Washington, D.C.

Subject: Request for Information (RFI) on Federal Old-growth and Mature Forests, 87 Fed. Reg. 42,493 (July 15, 2022); Docket Number: 2022-15185

Dear Mr. Barbour:

The Siskiyou County Board of Supervisors submits this letter to respond to the Request for Information (RFI) on Federal Old-growth and Mature Forests (RFI). Siskiyou County cares deeply about and has a vested interest in the health, resiliency and viability of our federally forested lands.

Approximately 62% of Siskiyou County lands are under federal ownership and are managed by the United States Forest Service, which makes the topics of forest health, catastrophic wildfire and timber harvesting a top priority for the County.

The County, along with much of the West, faces increasing catastrophic wildfire which has severely impacted Northern California on an almost yearly basis. In 2010, it was estimated that there was an average of 400 trees per acre throughout the Sierras, where approximately 70 trees populated an acre prior to the Gold Rush. Continually increasing tree density is a large contributor to the number, size, and intensity of wildfires. In addition, approximately only seven percent of annual growth is removed from the landscape per year through thinning and harvesting.

We appreciate the Biden Administration's ambitious goals of increasing the pace and scale of science-based, active forest management to reduce the risk of catastrophic wildfires, to protect at-risk communities and vulnerable populations, and improve the health and resiliency of our federal forests. Although we appreciate the focus on old-growth and mature forests, the greatest threat to our federal forests and public safety are catastrophic wildfires and toxic smoke.

Catastrophic wildfires impact Siskiyou County's landscape, vulnerable communities' wildlife species, water quality, economy and citizen's, and requires that more than \$1 billion dollars of California taxpayer money, and over 50% of the Forest Service's budget, be spent annually to fight wildfires. More than 80 million acres of federal forests are at-risk and need action-based solutions. Catastrophic wildfire effects the air we breathe, the water we drink, wildlife populations, recreational opportunities for tens of millions of Americans, and likely trillions of dollars in critical infrastructure, homes, businesses of all sizes and types, and overall public health and well-being.

In Siskiyou County during summer 2018, breathing the air was equivalent to smoking ten cigarettes a day. There

were constant media alerts on unhealthy and very unhealthy smoke days, 37 days from July to September, advising residents to limit their outdoor activities and recreation. Unfortunately, smoke has become an expected factor during summer months, and summers without smoke have become rare and surprising.

Siskiyou County is a wonderful place for people to visit and recreate, however, visitors are reluctant to come to the area when smoke is present, which impacts our already economically stressed communities. In addition, while we don't yet know the full harm of wildfire smoke on agricultural production, there is evidence that it affects growth and harvesting rates on various crops, and that chemicals and particulates in wildfire smoke impact their success in the market; for example, mint produced in northern California has been rejected from the UN market for testing positive for a chemical that was present to the area only through wildfire smoke.

As the American Forestry Resource Council (AFRC) describes in their letter, "we implore the Administration to tackle this emergency as an emergency: to take an all-hands-on-deck, urgent approach; deploy all available federal resources, technology, and management tools; and to deliver a message - from D.C. down to the forest level - that elevates, prioritizes, and focuses agency personnel on addressing the unhealthy conditions of our federal forests."

We fully support, and through this letter promote, all of AFRC's recommendations detailed in their letter (enclosed), and their responses to the input requested. If AFRC's letter were fully implemented, the outcomes would serve to bolster the Forest Service to perform much-needed action throughout Siskiyou County, and address our long-standing forestry and wildfire issues.

We appreciate the opportunity to provide our comments, and to support the comments submitted by the AFRC. Should you have any questions about our concerns, please don't hesitate to contact Elizabeth Nielsen, Deputy County Administrator at [enielsen@co.siskiyou.ca.us](mailto:enielsen@co.siskiyou.ca.us) or (530) 842-8012.

Sincerely,

Brandon A. Criss

Chair, Board of Supervisors

RE: Request for Information (RFI) on Federal Old-growth and Mature Forests, 87 Fed. Reg. 42,493 (July 15, 2022); Docket Number: 2022-15185ATTACHMENT: American Forest Resource Council Submitted Letter - coded as their submission, incorporated to this Comment Letter by reference.