Data Submitted (UTC 11): 12/18/2023 8:00:00 AM First name: Anon Last name: Anon Organization: BlueRibbon Coalition Title: Comments: Please see attached comment.

General Comments We support any additional comments that encourage the USFS to maximize the total acreage for restoration of forest resilience and health and catastrophic wildfire prevention by SERAL 2.0 through implementation of treatments. We strongly advocate against a [Idquo]conservation alternative,[rdquo] and encourage the USFS to develop a recreation and access alternative that expands current access, as this area of the Sierra Nevada mountain range is at severe risk of catastrophic wildfire and mitigation efforts are urgently needed.

One of the biggest threats to the health and resilience of SNF today is catastrophic wildfire. In California, between 2020 and 2021, over 6.8 million acres were burned by catastrophic wildfire. Wildfire of this type decimates the landscape, incinerating full forests and every form of life that resides in it. As noted in the DEIS, SNF now forms a unique [Idquo]island[rdquo] of public land that remains untouched by catastrophic wildfire. It is now more important than ever to protect this area from this threat. SERAL is designed to reduce risk of catastrophic wildfire. Historically, naturally occurring fires were part of forest management. Over the last several decades, natural wildfire has been suppressed and an increased density of trees and underbrush have choked the land and created the perfect conditions for total destruction by catastrophic wildfire. SERAL will thin the forest from over-density of trees and brush to restore healthy balance and make the forest more resilient to survive future fires.

## **Outdoor Recreation**

The area of SNF contained within the boundaries of SERAL is a popular area of off-highway use and dispersed camping. It covers a large area of the Northern California Sierra Nevada mountain range. Multiple communities that are economically dependent upon the health of the forest and public access to outdoor recreation in the forest, lie inside or within close proximity to the boundaries of SERAL. USFS should work to maximize OHV use in this area, which can be achieved by ensuring that all current and newly created roads remain open and maintained for use following completion of SERAL. We do not support the post-project decommissioning of any roads that are constructed or improved for SERAL. NEPA requires agencies to consider a range of viable alternatives, and the recreation interest in SNF justifies the inclusion of analysis of impact on public access to outdoor recreation as a component of the DEIS. We ask the USFS to incorporate impact on outdoor recreation as a component of the DEIS.

## Users with Disabilities

We recommend that the USFS use this SERAL project to finally begin to reverse its decades-long systematic discrimination against those with mobility-impairment-related disabilities. The USFS has committed to manage our public lands for public benefit. Forest closures that eliminate or restrict motorized access create discrimination against people with disabilities. I believe that maintaining motorized access to public lands is critically important, as it provides a mode of access that persons with disabilities can use and enjoy.

On his first day in office, Biden issued an [Idquo]Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government (EO14008).[rdquo] This executive order established [Idquo]an ambitious whole-of-government equity agenda[rdquo] which focuses on addressing [Idquo]entrenched disparities in our laws and public policies,[rdquo] and mandates a [Idquo]comprehensive approach to advancing equity for all, including people of color and others who have been historically underserved, marginalized, and adversely affected by persistent poverty and inequality.[rdquo]

Under this executive order, [ldquo]The term [lsquo]equity[rsquo] means the consistent and systematic fair, just, and impartial treatment of all individuals, including individuals who belong to underserved communities that have been denied such treatment, such as ... persons with disabilities....[rdquo] Historically, there has been no group more greatly marginalized and excluded by public land management policies, and motorized travel management policies in particular, than people with disabilities. Outdoor enthusiasts with ambulatory disabilities frequently rely on motorized travel as their sole means to enjoy recreating on public lands. Not everyone has the ability to hike into a remote wilderness area, but many such people are still able to drive Jeeps, side-by-sides, and ATVs, which are restricted to the designated motorized route network.

Motorized access eliminates ableist bias in forest management policies, which aligns with the goals of EO14008. Management policies that focus on minimizing motorized recreation have caused significant decrease in public access in public lands over many decades; this has disproportionately impacted people with disabilities. In alignment with EO14008, we urge the USFS to advance equity in public access to SNF by removing policies that discriminate against those with disabilities. For SERAL 2.0, we ask that USFS preserve existing roads and trails, and conduct maintenance to retain all newly created roads and trails.

Social & amp; Economic Impact One of the hallmark components of SERAL is its proactive inclusion of social impacts from project implementation. We advocate for consideration of social and economic impacts within USFS management policies, and commend SNF for diligence in centering elements of SERAL on social impact. Additionally, we contend that social impact cannot be divorced from economic impact - socioeconomic factors of consideration are inherently intertwined. We therefore recommend that the USFS incorporate greater depth of analysis and consideration for socioeconomic impact in SERAL 2.0.

The USFS should evaluate and weigh the value of potential loss of businesses, residences, tourism, and outdoor recreation from a catastrophic fire event. Given the extremity of catastrophic wildfire that has occurred in California within just the last 2 years, the prevalence of evidence to draw from to conduct this analysis is vast. Socioeconomic loss from catastrophic wildfire has both immediate and long-term impacts that ripple out from the local community to far-reaching corners of regional, state, and even national economies. Immediate, local impacts include loss of homes and businesses when structures burn, loss of jobs for those employed in local businesses, loss of total financial viability for those who own local businesses that are destroyed, and loss of infrastructure (IE: power, water, utility services, damage to roads and transportation) that impacts both those who do and do not suffer loss of homes or businesses from the fire. Long-term and broader-reaching local impacts include loss of economic viability across the community due to forest closures that halt public access, outdoor recreation, and tourism across the region from regular seasonal ventures such as camping, hiking, hunting, fishing, foraging, OHV and snowmobile excursions, and related activities.

When considering the broader range of impact beyond the local communities where a fire incident occurs, costs continue to mount quickly. Catastrophic wildfire is the attributed cause of an estimated \$150 billion in financial loss in California in 2020. In addition to the immediate forms of loss as noted above, this estimate also includes economic losses related to highway closures, evacuations, increased insurance premiums, firefighting costs, flight cancellations and health effects by hazardous air conditions.

The Rim Fire of 2013 as cited in an article in Wildfire Today, the financial impact of the Rim Fire included [Idquo]structures burned, crops and pastures ruined, economic losses from decreased tourism, medical treatment for the effects of smoke, salaries of law enforcement and highway maintenance personnel, counseling for post-traumatic stress disorder, costs incurred by evacuees, infrastructure shutdowns, rehab of denuded slopes, flood and debris flow prevention, and repairing damage to reservoirs filled with silt.[rdquo] Mitigating fire danger through more forest thinning can reduce the risks of catastrophic wildfire and the extremity of socioeconomic impact that they cause. The 2013 Rim Fire in California caused \$1.8 billion in environmental and

property damage, or \$7,800 an acre. According to fire ecologist Robert Gray, [Idquo]We can do an awful lot of treatment at \$7,800 an acre and actually save money.[rdquo]

We encourage the USFS to seriously, carefully, and thoroughly evaluate the potential socioeconomic impacts of catastrophic wildfire when considering selection of Alternatives 1, 2, 3 or 4 for SERAL 2.0. The USFS carries the weight of responsibility for potential negative socioeconomic impacts, as the USFS also carries the responsibility of managing public lands within SNF. There are many private citizens who, as residents and business owners within the SERAL project boundaries, advocate for effective vegetation management and would in fact take part in thinning trees, underbrush, deadwood, and excess biomass if it were permissible for private citizens to do so. Whereas SNF is USFS managed land, the USFS bears responsibility for vegetation management and bars private citizens from implementing such projects independently. With widespread understanding of the value and critical need for effective vegetation management within SNF, a choice to implement a decision that significantly minimizes the benefits of catastrophic wildfire prevention, could be assessed as an act of intentional or gross negligence by the USFS.

Of equal importance to assessing the potential socioeconomic loss from catastrophic fire, is assessment of socioeconomic gain through implementation of vegetation management projects like SERAL 2.0. If SNF may be restored to healthy and resilient status, it is critical to resolve over densification through logging, salvage, and removal of excess timber and deadwood. Congressman Tom McClintock correctly stated in a presentation to support The Resilient Federal Forest Act of 2015, [ldquo]There[rsquo]s an old adage that excess timber comes out of the forest one way or the other. It[rsquo]s either carried out, or it burns out.[rdquo]

In fact, excess timber has not been effectively removed from federal forest lands for over 30 consecutive years. As noted in an article sharing critique of the role of extreme environmentalism as a direct causal factor for extreme wildfire in California, from 1960 to 1990, 10.3 billion board feet of timber were removed from federal forest land each year. From 1991 to 2000 that number dropped to 2.1 billion board feet of timber per year, and has remained at an average of about 2.5 billion board feet per year from 2000 to 2021. Simple calculations quickly demonstrate how the dramatic decrease in removal of timber from federally managed land for over 30 years has contributed to overly dense, fire prone forests.

Removal of excess timber would stimulate socioeconomic health in the communities that lie in and nearby SNF through growth in jobs and commerce. Forestry and outdoor recreation represent vital components of the economy in the communities that are local to SNF. In 2020, national GDP from the outdoor recreation industry produced \$374 billion. California takes the lead in financial value added by outdoor recreation over other states across the nation, contributing nearly 12% of the national total, equating to \$44 billion in GDP in 2020. Of that \$44 billion, \$1.2 billion is attributed directly to the forestry industry. We advocate to maximize the broad socioeconomic benefits that this project will facilitate through timber harvest, salvage, and sale.

We would like to close by acknowledging the multifaceted approach that the USFS has taken in proposal for this SERAL 2.0 project. It is commendable that the vested interests of stakeholders across many spectrums, including ecology, wildlife, recreation, industry, and community, have all been considered to some degree within the scope of intended benefits of this project. We support [Idquo]shared use[rdquo]. As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and non motorized recreation use often overlap as OHV[rsquo]s often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

BRC would like to be considered an interested public for this project. Information can be sent to the following address and email address:

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