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Title:

Comments: Please see attached comment and attachment.

BlueRibbon Coalition (BRC) is writing to provide feedback for Old Growth Forests (FS-2023-0006-0002). BRC is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands and waters for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with natural resource managers and other recreationists. Our members use motorized and non-motorized means of recreation, including OHVs, horses, mountain bikes, and hiking to enjoy federally managed lands throughout the United States, including those of the United States Forest Service. BRC members visit our national forests for motorized recreation, snowmobiling, sightseeing, photography, rockhounding, hunting, wildlife and nature study, camping, observing cultural resources, and other similar pursuits. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future. BRC supports hundreds of timber harvest projects each year and supports active management.

The agency's primary goal must be the creation of healthy, sustainable forests. The best way to do that is to implement management policies that prioritize and facilitate timber harvesting and in the process support rural communities and their economies that depend on the national forests.

BlueRibbon Coalition strongly supports comments submitted by Americans Stewards for Liberty and ANPR and have attached them to this comment.

#### Wildfire

Habitat loss is the largest threat to wildlife and wildfire is the largest threat to habitat loss. One wildfire could cause an entire species to go extinct. We support the Forest Service in properly managing the forests to prevent wildfires that could cause harm to wildlife. However, many conservation groups actively litigate forest projects that help mitigate fires. One of the best things that can be done to protect wildlife and habitat is to actively manage forests to prevent wildfires. In order to adequately manage the forest roads are a critical component. Roads not only provide access to carry-out forest management projects but also act as a natural fire barrier.

#### Timber Harvest

Timber harvest and any sales from forest treatments will also help stimulate the local economy. We believe the USFS should move forward with timber harvest on the full 5,800 acres. The proposed project provides local jobs and brings in local revenue. BRC supports these efforts and supports any comments made by locals and members who approve these projects for local economic benefit. Wildfire is the largest threat to habitat loss. One wildfire could cause an entire species to go extinct. We support the Forest Service in properly managing the forests to prevent wildfires that could cause harm to wildlife.

#### Public Health and Safety

Strong consideration should be made to the affects of not harvesting old growth forests and how the potential of wildfire can increase. This is not only an economic concern but a public health concern. "It is well documented

that exposure to wildfire smoke is associated with adverse respiratory, cardiovascular, and birth outcomes, and premature mortality."1 This study also shows that, "Existing research supports the notion that historical fire suppression policies are insufficient for longer-term fire management." "Over the last three decades, the acreage burned annually by wildfire across the United States has doubled. This trend is driven by western states such as California, which experienced a fivefold increase in annual acreage burned from wildfire over the last half-century (Williams et al., 2019). While wildfires can impact the environment and human health through various pathways (e.g., impaired drinking water, soils, and crops)". This proposal needs to take this information into consideration and use best available science. "Wildfire smoke is composed of various compounds known to be hazardous to human health, including federally-designated criteria air pollutants." "In the United States, the overall population experiencing wildfire smoke will continue to increase due to projected increases in wildfires. Considering climate change projections through 2050, it is estimated that more than 82 million people in the United States will be subject to a 57% and 31% increase in the frequency and intensity of smoke waves, respectively (Liu et al., 2016a)." As is made evident, wildfire causes significant harm to humans, wildlife, habitat and the economy in various ways.

#### Recreation

Forest management affects recreation and the general public. If a wildfire arises not only is the forest unusable to the public during the life of the fire but it is often closed and unusable to the public for years afterwards. Roads are often destroyed as a result of wildfires and should always be re-built or maintained in order to provide the same level of access as before. This should be considered when analyzing socioeconomics, local communities as well as disability access.

Conclusion We would like to close by saying we support "shared use". 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 nonmotorized recreation use often overlap as OHV'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

ATTACHMENT: Filed Comments on USFS ANPR FS-2023-0006-90947 With Attachments.pdf - Letter from Margaret Byfield with American Stewards of Liberty: COMMENTS ON THE USDA FOREST SERVICE'S ADVANCE NOTICE OF PROPOSED RULEMAKING REGARDING MANAGING THE NATIONAL FORESTS FOR CLIMATE RESILIENCE, July 20,2023

ATTACHMENT: Old Growth Forests.docx.pdf - body of letter

REFERENCE: [https://www.lung.org/getmedia/fd7ff728-56d9-4b33-82eb-abd06f01bc3b/pse\\_wildfire-and-prescribed-fire-brief\\_final\\_2022.pdf](https://www.lung.org/getmedia/fd7ff728-56d9-4b33-82eb-abd06f01bc3b/pse_wildfire-and-prescribed-fire-brief_final_2022.pdf) Footnote link in body of text