

# PUBLIC SUBMISSION

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Exposure Assessments for Per- or Polyfluoroalkyl Substances (PFAS) 0923-18AJK

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## General Comment

WILDFIRE and HEALTH AND HABITAT. The greatest threat to many endangered species and their habitat is catastrophic WILDFIRE.. Yet rather than thinning the forest to protect this habitat, were spending millions upon millions on extraordinarily long, complicated, voluminous documents that IMPEDE our ability to properly manage the forests for the benefit of all species. Not surprisingly, the clear and present danger of high-intensity fires on public lands in California have increased significantly over the last 20 years. Besides reducing the risk of catastrophic fire, trees in a restored healthy forest are more resistant to insect predation. .... Further, in restored forests faster growing large trees sequester carbon faster than smaller trees.

POOR FOREST MANAGEMENT ALSO HAS LESS WATER FOR WILDLIFE AND PEOPLE. Forest must be thinned, trees create right-sized gaps in the canopy to allow snow to fall to the ground yet receive enough shade to be protected from melting too early, unlike closed canopies from too many trees where 15 to 60 percent of snow never reaches the ground and is lost to evaporation...

The consequences are a domino effect that results in forest management coming to a standstill, there are environmental consequences to any action we take, and if we were not cautious and careful and cooperative that can cause harm, Schulz reiterated during the hearing. At the same time, there is an environmental consequence to doing nothing, and that's what I'm concerned about. Economic depression of forest communities makes rebuilding more difficult. Lengthy and complex planning processes such as NEPA, CEQA, and the ESA must be complied with before any action is taken. CARB impedes prescribed therapeutic burns while promoting the

unintended consequence of enabling larger, more damaging fires. Today, timber harvest in public forests is practically non-existent. Rather than a healthy 50 to 100 trees per acre, the west slope now averages 300-plus trees per acre. This concentration of trees and underbrush amounts to 45 tons of dry fuel per acre, or a potential for catastrophic fire. restoration is sorely needed for a return to healthy forests. environmental restoration program of unprecedented scale can alter the direction of current high-intensity wildfire trends

Many federally managed forests are dangerously overgrown and action need be taken to remove excessive growth and turn the resulting wood and biomass into products with economic value. Preserving dynamic ecosystems in a static state is just not possible Many of the things causing forests to decline is an environmental disconnect ... .

Forest Service and Fema needs to change, Too many Fires and Bad ideas , Wildfires California Air Resources Board (CARB) and the California Department of Public Health (CDPH), BEFORE A FIRE all state public land officials and local public health officials must prepare for smoke events, to take measures to protect the public, and communicate with the public about wildfire prevention . Where roads have narrowed over the years as vegetation and trees have encroached, even into ditches and onto shoulders, they should have cleared this vegetation away. where California allowed the natural landscape to grow higher, they should have removed the fire threat to create defensible space.

They should have cleared dead and dying trees that have become hazards that can carry fire across large areas, or into areas that are a threat to values-at-risk, state management must move aggressively to minimize that threat. All land managers across the state fire Departments. burnable vegetation, must think about fire in a new and aggressive way. implementing such a strategy is carrying out activities that address vegetation composition and structure and also alters fuel loads to reduce hazards. Such methods of fuel treatment safeguard public and firefighter safety and protect our landscapes, scenic vistas, and natural and historic objects; our neighbors, nearby communities, and infrastructure; and our own administrative and visitor service assets and facility, think about a different way of managing public lands to better incorporate fuels management into your resource-management planning. appropriate reviews and identification of resource needs and data gaps. California should ensure fire management plans are up to date and include the identified needs for a robust fuels-management program to support wildfire prevention and suppression efforts to be developed and implemented by both fire and other resource staff. Identify ways to address the realities we face in a safer and more effective manner. ..

We simply cannot afford to continue business as usual. ..We must do everything we can to address the steady accumulation of fuels on our Nations public lands and the resulting increased threats from catastrophic wildfires.