



Skagit County Board of Commissioners

Ron Wesen, First District

Peter Browning, Second District

Lisa Janicki, Third District

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Thank you for the opportunity to comment on the Draft EIS for the Northwest Forest Plan Amendment (NWFP). The agency's intent to improve the current conditions has not gone unrecognized, thank you. Skagit County is in the Northwest of Washington State with approximately 80% of the land base in forest lands and 282,812 acres (23% of the land base) in the Mount Baker Snoqualmie National Forest (MBSNF). Our County is generally considered to be a 'moist' forest region, though with increasing temperatures and dryness, there are patches of 'dry' forests mixed throughout the MBSNF. We have two towns (Marblemount and Rockport) and two communities (Corkindale and Cascade River Park) directly adjacent to the MBSNF and two towns Concrete and Hamilton) within 3-6 miles of the MBSNF. There are two large production mills (one in the heart of Skagit County and the other on the border of the adjacent Snohomish County). These mills employ family wage jobs, support our communities, and help provide economic resources to our county. All of which are greatly impacted by actions taken on the MBSNF. The 1994 NWFP (Plan) significantly and adversely impacted the economics and services on our rural communities and now has the potential to extremely impact much more of our County than just the federal forested lands with the threat of future wildfires. Actions must be taken. We were relieved and hesitantly optimistic that the USFS grasped and acknowledged the problems, limitations, and short falls of the Plan by proposing an amendment. We greatly appreciate the initial work done to date, especially by the Federal Advisory Committee (FAC), in light of the restricted timeframe and the limited 5 issues allowed to be addressed. However, though we'd like to support an alternative, we believe the alternatives in the DEIS fall short of what is needed to meet the Purpose and Need for action as stated in the Proposed Action. Still, we are pleased with the work and inclusion of incorporating Indigenous knowledge into the amendment, attempts to increase the number of acres being opened for harvest, improvements of fire resilience targets and actions, and the desire to increase old growth. It must be realized that more work is essential, specifically on forest stewardship, sustainability for communities and climate because the proposed alternatives minimally at best, achieve addressing the listed NEEDS ("...support adaptation to and **mitigation of climate change in the NWFP area**;... and contribute **predictable supplies of timber and nontimber products to support economic sustainability in communities affected by forest management in the NWFP area**" DEIS page ES-2)

Skagit County has been actively engaged in the FAC process and has tediously reviewed the proposed alternatives and supporting documents. We are opposed to Alternatives A and C. The current Plan Alternative A, No Action, has and will continue to jeopardize our County both in treating wildfire threats, and in the loss of jobs. Strengthening ecosystems to adapt to climate change and improving recruitment of old-growth forests will both remain unchanged. Alternative C would only exasperate the faults of the current Plan on wildfires (DEIS page ES-8); result in "a reduced pace, scale, and intensity of treatments than under Alternative B and would therefore not move toward the desired conditions as quickly or effectively" (DEIS page ES-7); reduce community sustainability with lower harvest volumes (DEIS page ES-11); and it would only briefly be more beneficial to species requiring closed canopy cover (DEIS page ES-9).

Though Alternative B is most similar to what the FAC had unanimously agreed upon, it does not provide the avenue for the volume of wood to the mills required for long-term sustainability. It is important to note a simple fact leading to our concern for wood supply coming from Alternative B. *Currently less than 16% of the total 19.7 million acres in the Plan is allocated Matrix, which was supposed to be the land use allocation available for harvesting and yet never obtained the predicted harvest levels.* The other land use allocations (Late Successional Reserves- LSR, Administrative Withdrawn Area, Adaptive Management Area- AMA, Riparian Reserves and Congressionally Reserved Areas) are severely limited to minimal thinning or no touch approaches. Although Alternative B, where more acres are presumed to be opened for harvesting by allowing LSR to extend the age for management from 80 years to 120 years these trees are younger with less volume and subject to more restrictions. LSRs, which are intended to move towards old growth and Matrix lands, which are intended to provide a sustainable supply of timber, are subject to Survey and Management Standards and Guidelines listing over 300 species (Appendix D Draft EIS) that give specific management direction, which requires “surveys before initiating management actions and limitations on actions if found” *. This is a very time-consuming protocol, and many past proposed sales were shunned due to the cost and time involved in performing the survey besides simply putting large areas off-limits to any harvesting. The Survey and Manage Standards and Guidelines must be removed (as it was suggested in Alternative D for fire treatments next to communities) in the amendment to achieve a predictable and sustainable outcome. And whereby Alternative B opens more acres in moist LSR it also incorporates almost half of the land currently within moist Matrix land use allocation (LUA) to a quasi-LSR designation (approximately 1.3 million acres) by adding new desired conditions on what is termed *Mature and Old-Growth Moist Matrix* that mirror the desired conditions for LSRs. This will trigger far less volume and decrease future sustainability in this quasi LSR land base moves towards older growth. Ultimately this does not help with wildfire resistance or resilience or providing a predictable supply of timber for long-term sustainability for our communities. If this route is taken, it **must include desired conditions that focus on timber production.** Otherwise, the USFS must develop desired conditions within the LSRs to mimic Matrix lands so that they can be treated as if they are Matrix LUAs due to the prohibition of redesignation of LUAs in this amendment.

Other avenues Skagit County believes need to be considered for helping to ensure sustained yield timber would be to 1. formulate a directive(s) that would guarantee regeneration harvests occur on the Matrix lands rather than just thinning applications, which is not sustainable; 2. remove the second site potential tree height buffer on Riparian Reserves for fish bearing streams (current Best Available Science in our region supports a single tree height as adequate protection); 3. reallocate the Adaptive Management Areas to the Matrix LUAs and continue to study treatments under that management criteria; and 4. remove the blanket prohibition of salvage harvest after a disaster on LSRs, as such, Alternative D is preferred over B when considering timber salvage in Moist Matrix. If salvaged appropriately it can offer both wood to the mills and wood products that will store carbon along with active tree planting restoration. (It was unfortunate that time prohibited a more robust discussion on climate, carbon, and storage in this amendment.)

Our County is not alone in having pockets of either ‘dry’ and ‘moist’ forests scattered within our national forest, along with the other land allocations and specific habitats, which requires local knowledge and understanding to provide flexibility and timeliness in applying the different management techniques. We therefore support Alternative D in changing approval of LSR assessments and certain silvicultural activities within LSR to the Forest Supervisor as this will also eliminate a review level. This would be especially beneficial in the case of assessing wildfire resilience/resistance and subsequent treatments. For example, it is known that fires in ‘moist’ forests are less frequent, burn hotter and are more catastrophic than in ‘dry’ forests. Assessment of treatments needs to be different when these two forest types are adjacent to one another (as we pointed out occur on the MBSNF). Consideration needs to be given to the ability to access the ‘dry’ forests so they can be detained before igniting the surrounding ‘moist’ forests. Therefore, it would be advantageous to have the review and decisions

for these actions done at the forest supervisory level for the best outcomes. And continuing with actions for wildfire reliance, we support Alternative D with respect to providing an exemption from the Survey and Manage program for hazardous fuel reduction treatments adjacent to communities expanding the management framework for addressing wildfire risk to communities and believe this should be exempted throughout the amendment as noted above. As we stated before in our scoping letter, we believe some aggressive actions may be necessary, ultimately losing some forested ecosystems and habitat to save millions more. This would protect not only NSO habitat in the MBSNF, but other forests in and around our county, including adjoining private and State forestlands as well as human lives, homes, and infrastructure.

Again, thank you for the work done in both acknowledging the need for changes to the 1994 Plan through an Action Plan and then in preparing amendments to satisfy those unmet objectives and new challenges. Improving conservation and recruitment of mature and old-growth forest conditions cannot happen unless wildfire resilience and resistance are obtained as well as providing a predictable supply of timber products to support long-term sustainability of communities who support the infrastructure that enables the thinning in LSRs, forest health and the reduction of climate impacts.

Sincerely,

**BOARD OF COUNTY COMMISSIONERS
SKAGIT COUNTY, WASHINGTON**



Lisa Janicki, Chair



Ron Wesen, Commissioner



Peter Browning, Commissioner

*The Regional Ecosystem Office provides support to the interagency management of the Northwest Forest Plan and access to information relating to its implementation and monitoring.

