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Comments: Please see the comment letter on the NOGA from the Skagit County Commissioners as attached.

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Thank you for the opportunity to comment on the USFS National Old Growth Amendment (NOGA). Actions from this Amendment and other USFS regulations, guidelines and policies affect Skagit County. As stated in the County's adopted Comprehensive Plan, Skagit County's "Natural resource lands are a cornerstone of Skagit County's economy, community and history. As such, their protection and enhancement is of paramount importance to Skagit County and its citizens." It further states "Aside from wood products, forestry is a significant contributor to the economy, environment and lifestyle in Skagit County.", and further states that "[hellip]often (the) overlooked benefit of good forest management is the industry's contribution to and protection of clean air, water, fish & wildlife habitat, and recreational activities." The Comprehensive Plan goals and policies exemplify the commitment the County has to a viable forest economy. Skagit County has approximately 890,400 forested acres comprising 80% of its land base with about 41% in working forests (managed) and 530,000 acres (59%) in restricted use that are both State and federal lands. Most notably, 422,633 acres (49% of Skagit's land base) is restricted acres in federal forests. The Mount Baker Snoqualmie National Forest (MBSNF), which is governed by one of the 18 Land Management Plans (LMP) amended by the Northwest Forest Plan (NWFP) is 282,812 acres (32%) of the 890,400 acres of forested landscape. Skagit County fully embraces its natural resources, the environment and its ecosystems and our rural timber communities including our two large production mills, one in the heart of the county and the other neighboring on the border that are dependent on a consistent supply of timber from the forestland in Skagit County.

In general, Skagit County appreciates the intent of the NOGA and believes the commitment towards protecting Old Growth is in concert with our values. However, upon review of the DEIS and the supporting documents, (as well as having attendee participation and comments on the current NWFP Amendment and by zoom meetings for NACo by the USFS discussing the NOGA over the last several months), we believe there are substantial problems with the NOGA Preferred Alternative (#2). These problems are 'disconnects' between the intent of NOGA and its implementation. We believe this will result in the current operations becoming more restricted and ultimately undermining the intent of this Amendment. We believe it has the potential of reversing past gains made within the NWFP and LMPs on Old Growth recruitment and exacerbating declines in the economy of our communities (socioeconomic impacts) and forest health while increasing threats from fire in our region.

Disconnect number one is the scale of the NOGA, which is far too large to be successful given the variabilities between each of the Regions throughout the United States and then again within those regions. Guidance or prescriptions for one landscape cannot possibly be the same across the vast United States with variations of climate, water, elevation, soil type to name a few. For example, in Washington State alone, we have significant

differences between the west and east side of the State with moist versus dry forests, soil types, elevation and topography, areas more suited for prescribed burns and others not, methods for managing climate resilience, each requiring different prescriptions for beneficial results. A policy in one landscape is not appropriate for another and trying to pave the path for desired Old Growth conditions is not possible with a one-size national level policy that can only create ambiguity in the appropriate management necessary for a specific area. Nor does implementation at a national scale take into consideration the work from the individual advisory committees with local expertise on regional forest plans, such as the NWFP. After an aggressive year-long effort, the 21-member Advisory Committee just proposed 192 amendments to the NWFP that are appropriate to this Region and that include addressing Late Successional Reserve, Old Growth, and Mature Growth forests. The NWFP includes the establishment of over 7.5 million acres of late-successional reserves, whose primary purpose is to protect existing, and develop future, old growth forest conditions. Having more guidance from the NOGA creates potential for redundancy of actions and potential stumbling blocks for pertinent management procedures.

The national scale of the NOGA sets the stage for uncertainty and conflict. As it is, on the ground decision making with the forest service is not always consistent with what was advised in the current LMPs, subsequently producing inconsistency amongst the guidelines.

Disconnect number two is the failure of the USFS to have followed Executive Order 14072 outlining the process to identify and surmise the threats to Old Growth forests thus correctly developing effective management policies that would avert these threats. The Threats Assessment, which came out a week prior to the issuance of the DEIS, should have come prior to the development of the policies in the December 2023 Notice of Intent (NOI), thus being out of the ordered sequence for proper public review and comment. The Threat Assessment identified "that mortality from wildfires is currently the leading threat to mature and old-growth forests, followed by insects and disease" over the past twenty years and will continue into the future.

The threat assessment also concluded that old growth loss was greater in areas reserved from timber harvest (wilderness, inventoried roadless areas, national Monuments) than in areas where timber harvest was allowed and encouraged. In fact, while Old Growth decreased in reserved areas, it increased by 7.8% in areas where timber harvest is allowed and encouraged. The Forest Service noted that these results suggest that strictly reserving Old Growth forests may not always ensure that they are protected from future losses. So, is there really a need for a change in actions other than to reduce existing hurdles? As noted above, there are many restrictions within the standards and guidelines of the NWFP already inhibiting the USFS from actively managing for protection and recruitment of Old Growth, all of which will become more heavily burdened with another layer of policies from a National Amendment.

Disconnect number three is purely the number of restrictions currently in place hindering sustainment of existing Old Growth forests and future recruitment. Rather than to continue stumbling over policies that may be good for some instances and not others, the USFS needs to remove existing barriers and follow appropriate management procedures to address the threats identified in the Threats Assessment. Within the land base on the MBSNF (1,762,422 acres), 850,500 acres are covered by Congressionally Reserved areas (wilderness), 350,000 acres are within roadless areas, 100,000 acres have been removed administratively from harvest, and of the remaining available for harvest, which is only 140,000 acres, are 56,000 acres in Matrix, 10,000 in Adaptive Management Areas and 74,000 acres generally in the late sessional reserves (LSRs). Under current policy guidelines, LSRs age out into a "hands-off" state after 80 years of age, resulting annually in decreased management opportunities. With the existing limitations in place, less than 8% is currently suitable for harvest, and yet, timber harvest is a fundamental tool for sound forest management. Since 2006, the average volume sold by the MBSNF has only been 7 MMBF; this represents less than 1% of annual growth and by some estimates is far less than the annual losses due to insect, disease and fire-driven mortality. This paltry harvest level unnecessarily limits needed revenues for road and bridge maintenance, reducing access to enable timely and effective fire suppression, and access to areas that need active management to protect and enhance Old Growth conditions. As noted above, additional standards and guidelines from the NOGA creates potential for redundancy of actions and potential

stumbling blocks for pertinent management procedures.

Disconnect number four is the potential socioeconomic impacts due to the Amendment, which have not been adequately analyzed or disclosed. As noted, the national scale of the Amendment makes it excessively difficult to forecast the number of acres of forest lands to be further protected, making it impossible to fully comprehend and evaluate the breadth of the impacts to communities and ecosystem services. The USFS found that "The amount and distribution of mature forests across the National Forest System suggest that many of these lands have the inherent capability to sustain old-growth forests into the future. This is far too general of a statement and most certainly can lead to more restrictions on harvesting timber in general. Not only does this create more management hurdles leading to more decline of old growth, but this type of unclarity is unacceptable to the economy of our rural counties and communities.

By protecting Old and Mature forests from the impacts caused by fire, insects and disease, extreme weather and drought, through a path of management, the impacts to our rural communities can also be lessened. Mills need volume to stay open and a continued reduction in trees harvested will lead to closures. Closures lead to loss of jobs at all levels from operators, cutting, removing, transporting, milling and transporting. Secondary markets are then at risk of closures leading to more job and community service losses. If logging declines and mills close, starting with the loss of jobs working in the woods on timber sale harvesting, the forests needing management for health will be at jeopardy and the neighboring communities will be at risk. Social sustainability will diminish as the community begins to shut down. This was easily seen in the aftermath of the northwest forest plan with many communities still affected by the loss in timber production. Increased fire activity and severity continues to desecrate forests and

communities in the Pacific Northwest, ultimately decreasing old growth stands. More active management protects Old Growth stands and allows road access to protect these areas from disease and fire.

Therefore, based on 1. the scale of the Amendment, 2. the potential for unintended restrictions and faltering interpretations due to redundancies from current guidelines in place, 3. the Threat Analysis coming out after the NOI, 4. the unclear number of forested acres/volume that would be affected, and finally, 5. the resulting potential for further impacts to our forest dependent communities, Skagit County believes Alternative 1 (No Action) is appropriate to keep in place with direction to the USFS to work on policies to address the "threats", which should include removing existing barriers and constraints to the management of old growth forests. As explained, Alternative 2, as proposed, has the potential for more uncertainty, complexity and more restrictions, accordingly, falling further away from implementing effective forest management solutions to help solve the identified threats as listed in the Threat

Assessment. Furthermore, it should not be overlooked that the Forest Service is simultaneously amending the NWFP with recommendations from the Advisory Committee currently being submitted. Those amendments include components that address the management of old- growth forests. The overlap between both amendments (NOGA and NWFP) is concerning to us and poses the potential for additional confusion. Therefore, Alternative 2 could only be supported by Skagit County if it were amended to omit application on those LMPs that are governed by the NWFP.

Finally, Skagit County strongly opposes Alternative 3. As noted in the DEIS, it would have the greatest impact on timber industry and the associated communities in our rural areas. It would limit any management opportunities thus increasing the potential threats identified in the Threats Analysis and reducing rather than promoting Old Growth forests.

Sincerely,

Board OF COUNTY COMMISSIONERS SKAGIT COUNTY, WASHINGTON

ATTACHMENT: 09-20-2024 - Comment Ltr USFS National Old Growth Amendment (NOGA)..pdf - this is the same content that is coded in text box; it was originally included as an attachment