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First name: Allison

Last name: Williams

Organization: Hood River County

Title: County Administrator

Comments: February 18, 2025

RE: Northwest Forest Plan Amendment #64745

Draft Environmental Impact Statement Comment

Hood River County leadership would like to take this opportunity to provide comments on the proposed Northwest Forest Plan Amendment, draft EIS and resulting alternatives.

Hood River County encompasses portions of Mt. Hood National Forest and Columbia River Gorge National Scenic Area Forest. These lands are immediately adjacent to county forest land and county communities, see Exhibit A (Map that follows). Following are the County's comments for consideration:

General:

Most land located within the Mt. Hood National Forest and Columbia River Gorge National Scenic Area under Federal control in Hood River County are zoned for forest use. As provided in the County's Comprehensive Plan, property zoned forest within the County is primarily intended to "assure the continuous growing and harvesting of trees," while protecting forest uses from conflicting development. Although planned and zoned by the County as part of its original Comprehensive Plan and Zoning Ordinance, land that is held in Federal ownership is exempt from Oregon Statewide Planning Goals and Hood River County Comprehensive Plan and Zoning Ordinance. After reviewing the four alternatives proposed as part of the Northwest Forest Plan (NWFP), none of the activities broadly discussed under them appear to conflict with state and local land use requirements, even if they were to apply to Federal lands, however, the impact of federal forest management policies directly impact the citizens, communities, and property of Hood River County.

Hood River County Comprehensive Plan Goals/Policies:

Goal 4 (Forest Lands) - The primary goal of lands zoned forest is to conserve forest lands for ongoing forest use and to minimize conflicting uses. The primary objectives under the umbrella of Goal 4 of the County's Comprehensive Plan are to provide reasonable opportunities for economic forest management, protection of soil, air, water, and fish and wildlife habitat, and allow for recreation and agriculture.

Goal 5 (Open Spaces, Scenic and Historic Areas, and Natural Resources) - Under Goal 5 of the County's Comprehensive Plan, the County strives for the conservation of open spaces, including the protection of air and water supplies, streams/wetlands/riparian areas, key fish and wildlife habitats, significant natural areas, cultural resources, and scenic views. A critical resource identified under Goal 5 is water, including the preservation of watersheds and ground water resources. The main potable water sources serving the majority of residents in the County (e.g. Crystal Springs Water District and City of the Hood River) are located adjacent to or near Federal Forest land. Protecting these resources from direct and indirect impacts associated with wildfire is critical to residents of the County, as well as the overall health of nearby ecosystems, which are also intended to be protected under Goal 5.

Goal 6 (Air and Land Resource Quality) - One of the key goals under Goal 6 of the County's Comprehensive Plan is the need to maintain a high level of air quality and protect the public's health and welfare from adverse amounts of air pollution, which would include wildfire smoke. By limiting commercial logging, minimizing fuel treatments, and relying on "natural processes" to manage forests, as described in Alternative C, the potential for larger wildfires and extended wildfire seasons will have the potential to reduce air quality and threaten public health.

Proscribed fire outside the fire season will result in communities being subject to air quality concerns year round. By allowing flexibility in treatment within or near areas identified as wildland urban interface (WUI) (Alternate B) the affect of smoke on nearby homes and businesses can be considered as a circumstance specific characteristic.

Goal 7 (Areas Subject to Natural Disasters and Hazards) - The primary objective under Goal 7 of the County's Comprehensive Plan is to protect life and property from natural disasters and hazards, including wildfires, on nearby communities and developed rural areas. Failure to manage fuels and quickly suppress wildfires on

Federal lands, especially those within or near areas identified as wildland urban interface (WUI) can create hazardous conditions that threaten nearby communities. The plan under Alternate B that recognizes a variety of environments within the NWFP and the need to manage wildland fires "according to site- and circumstance-specific characteristics that prioritize protection of people, property, and infrastructure" is consistent with the policies outlined under Goal 7 of the County's Comprehensive Plan. The opposite would occur under Alternative C, which limits active forest management, but instead relies on "natural processes," which can result in larger wildfires and longer wildfire seasons.

The County has just completed an update of its Natural Hazard Mitigation Plan and submits it as Exhibit B (NHMP, link below). This plan identifies and quantifies the impacts of a lack of wildfire management to our citizens and for the first time, the impact of poor air quality on the community. The current federal fire management practice is producing sustained and long-term fire activity which is substantially impacting our county's economy due to federal forest closures impacting recreational opportunities and our businesses and the health of our citizens due to increasing presence and severity of wildfire smoke.

The 1994 NWFP included a portion of federal timber receipts dedicated to county roads and schools. While a percentage of timber receipts would not be an appropriate source of funds, in our view, the model of funds being dedicated to local programs that improve indoor air quality and support local response would be appropriate to reduce the impact of "natural processes" on the local communities.

Goal 9 (Economic Development) - Included under Goal 9 of the County's Comprehensive Plan is the need to maintain and provide for a stable and healthy agricultural and forest product-based economy to support community stability. This includes preserving and enhancing agricultural and forest industries in the Central and Upper Valley and increasing employment opportunities for present and future County residents. Alternatives B and D align best with the policies found under Goal 9 by "supporting more flexibility in active forest restoration ... and a more predictable and sustainable supply of timber," both of which have the potential to create and sustain meaningful economic opportunities in the County.

When the NWFP was enacted in 1994, Counties received 25% of Federal Timber Receipts for roads and schools. It was a substantial number at that time, and warranted, since USFS lands take up over 73% of Forested Area in Hood River County and over 62% of all land in the County. The timber receipts helped to offset the economic activity that could be generated if the lands were not federally managed (including for uses other than forestland) and resulting tax revenue generated for County services and infrastructure (roads and schools) if it was in non-federal ownership. With the passage of time, and diminished receipts, we are now seeing the impacts to overall maintenance needs of County Road infrastructure and the burden to our school district in filling the funding void created by the diminished timber receipts.

Hood River County's forest lands provide significant impact to the county's operating budget, making up nearly 1/3 of the county's general fund budget. Federal forest management practices on adjacent property as seen on the map directly impact the ability of the county to operate its forest as evidenced by last year's Whiskey Creek Fire. Whiskey Creek Fire was allowed to burn for two months in wilderness from mid-July to mid-September, eventually burning about 3000 acres and at a cost of nearly 42 million. Fire management at this level necessitated adjacent property closures for the whole period impacting the recreating public and associated revenue streams the county, the State of Oregon and the county's businesses. Prompt attention to this fire could have eliminated millions of dollars of local, state and federal expense, not to mention the impacts of revenues on businesses who depend on our recreating community.

Hood River County is unique in that we straddle the divide between moist and dry forest environments described in the draft and therefore experience the potential for catastrophic fire in our forests every year. In our view, any resulting alternative should prioritize and maximize forest and water resources management and conservation, including timber harvest which approaches forest growth rates, improved and maintained fire road access and fuels management to mitigate wildfire risk and improve the chances of controlling wildfire. Utilizing active forest management practices and fuels treatment can indirectly reduce risk and effects of catastrophic fire on forests and adjacent riparian and water resources.

Concepts in Alternative B are most closely aligned with the goals of Hood River County.

Areas within one to two miles of federal forest land should be prioritized for timber harvest, road access and wildland fuels management. It is common during the hottest two months of fire season to experience fire behavior

conditions that may have spotting of one mile or more, immediately threatening not only county forest land but our communities.

Hood River County also has an active carbon portfolio. Lack of active forest and fire management will have negative effects on Forest Carbon levels over the long term.

Fires on federal land across the whole NWFP area should be suppressed immediately when occurring during the highest 8-10 weeks of fire danger, as measured by IC, ERC, BI and similar fire indices measure.

With this amendment, there is an opportunity to develop a policy that will positively impact our county for the next planning horizon.

Hood River County encourages the USFS team to consider this input when making edits to the Northwest Forest Plan Amendment #64745.

Sincerely,

Jennifer Euwer

Commission Chair

Incl: Exhibit A (Map that follows)

Exhibit B (Natural Hazard Mitigation Plan link - <https://www.hoodriversheriff.com/what-we-do/emergency-management/>)