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First name: Laura

Last name: Osiadacz

Organization: Kittitas County Board of Commissioners

Title:

Comments: Please see letter signed by the Kittitas County Board of Commissioners attached. Thank you.

March 10, 2025

District One []

District Two []

District Three []

Ms. Jacque Buchanan

Regional Forester, Pacific Northwest Region United States Forest Service

333 SW I51 Avenue

P.O. Box 3623

Portland, OR 97208-3623

RE: Northwest Forest Plan Amendment Draft Environmental Impact Statement Comments

Dear Ms. Buchanan,

Thank you for the opportunity to comment on the Northwest Forest Plan (NWFP) Amendment Draft

Environmental Impact Statement (DEIS). The work accomplished by the NWFP Advisory committee, including our own Commissioner Laura Osiadacz, has been nothing short of monumental. We wish to thank the committee for their diligence and commitment to developing this important document as the policies developed in this process matter to counties across the American West such as ours. With over one-fifth of our county comprised of National Forest, the health of our landscape, communities, livelihoods, and economy are highly dependent on the outcome of these efforts

In our review we find alternatives A, B, and C inadequate when applied with a focus on healthy, sustainable, fire-resilient forests capable of supporting rural resource economies and, therefore, not acceptable. In our assessment based on the present condition of our county's forests over 30 years of NWFP management, the original NWFP was not a success as evidenced by the increase in catastrophic wildfires and the adverse economic impact to our rural communities due to reduced vegetation management and timber harvest.

We are reviewing this document in support of Alternative D with additional recommendations to Alternative D, as necessary, where we believe further development of appropriate measures is required.

To begin at the most basic forest management level, it should be the intent of all efforts to create and maintain healthy, fire-resilient forest ecosystems regardless of Land Use Allocation (LUA) classification or moist/dry criteria. We believe descriptors and criteria can be developed to better classify and develop management systems for diverse ecosystems to achieve forest restoration goals consistent with historical range of variability based on best available science. As such, we find any single approach or Alternative reliant on narrow classification type to be flawed.

We, as elected local leaders, are charged with attempting to balance landscape resiliency with economic return for our constituents. Therefore, we believe this plan should emphasize formal local government consultation in decision-making with an ultimate focus on providing clarity for local forest supervisors to develop collaborative implementable solutions. To ensure defense of our vulnerable communities surrounded by forests filled with fuels accumulating over the last 30 years, we support the concept of Community Protection Areas as a critical component of rural wildfire resiliency. However, we strenuously advocate for their expansion from the current Alternative D recommendation of within  $\frac{1}{4}$  mile of community boundaries to one mile. District-level administration oftreatment in these areas should be maintained to ensure efficient and educated decision-making is used to protect local communities. Watersheds serving these communities must also fall under the Community Protection Area policies and procedures as these areas serve a critical public health purpose highly devastated by wildfire.

Rural counties such as ours and the small rural communities within have been disproportionately impacted by the loss of timber industry and associated jobs over the last 30 years. This extends to the loss of local tax revenue now offset by increased property taxes to maintain comparable government services and education. Out of 16 counties in Washington with National Forests operating under the NWFP, 10 are designated as distressed by the Washington Employment Security Department. Further, the average median income for these same 10 counties is \$70,972 according to Washington Office of Financial Management projected estimates for 2023. This combined figure lags the state median income of \$94,553 for the same period by a staggering 25%. Developing a sustainable harvest is not only a matter of landscape resilience - it is a matter of social equity for our rural communities.

There has been significant public comment made by residents pleading with the United States Forest Service to bring dignity back to the people living in rural timber communities. What was observed by Commissioner Osiadacz during public comment was that decision makers, including committee members, chose to be polite by letting individuals speak. However, the topic regarding negative impacts from the implementation of the original Northwest Forest Plan was never given sufficient time or attention. Today we have multiple communities nestled in the woods that are economically impoverished, depressed, experience high rates of drug abuse, and low graduation rates for high school students. The people living in these communities are important and it is imperative to make real commitments. It is time to responsibly open back up the woods. This will allow people living in these areas the opportunity once again to earn a fair wage in an industry they can be proud to be a part of.

However, any discussion of vegetation management and timber harvest must be done in conjunction with an authentic assessment of product marketability. If no cost-effective market exists, effective treatment and/or harvest potential are drastically reduced. As a result of treatment deficiency, there now exists in the forested lands more biomass than there is ability to market (current strategies such as piling and burning of the excess biomass should not be included as a future strategy). Therefore, the plan should recognize forest restoration goals and must acknowledge the parallel need to develop alternative markets, such as wood to energy and biochar, in addition to traditional solid wood manufacturing. We see no recognition of this economic reality in any Alternative presented.

The current practice of utilizing short-term contracts is a detriment to accomplishing forest restoration on the scale envisioned in Alternative D. We recommend long-term stewardship contracts that better guarantee a consistent market flow of forest biomass to attract new businesses with expertise in wood to energy and biochar. We understand that long-term contracts are being employed in some federal forests, such as the Colville National Forest. We recommend that the concept be more widely implemented.

Federal lands are critical for a multitude of accompanying management values besides forest industries. Watershed science, led by the Forest Service, has demonstrated that forest restoration projects can be developed and designed to enhance water yield and modify peak flow timing. We recommend, particularly in the eastern areas of Oregon and Washington, that the best available science be adhered to in analysis of prescribed practices. The economic values of watershed management are critical in areas where irrigated agriculture is a significant element of local commerce. Municipal water supply is also highly reliant on these same watersheds and the practices governing them.

The use of National Forests for livestock grazing has historically occurred and, with new technologies, can continue to be a significant contributor to the economic livelihood to many communities in Eastern Oregon and Washington as well as Northern California and should be given a high priority for continued use in this amendment. We believe it is important to acknowledge that livestock grazing is also an important vegetation management tool to achieve fire resiliency. Additionally, federal lands contain a wide variety of valuable minerals. Mineral exploration and extraction should be recognized for their potential economic return for local rural economies and should not be overlooked in the development of this amendment.

Our county has been assessed with a significant amount of Late-Successional Reserve (LSR) forest area which has significantly decreased treatment as well as harvest over the last 30 years. As a result, this area has experienced several wildfires and is consistently ranked at or near the top for significant wildfire risk nationally. Concurrently, insurance companies serving this region are cancelling home policies due to the untenable risk of covering dwellings in an environment of such high risk. We believe The LSR designation process needs considerable review not only in the criteria for assessment, but also in the intended results.

In support of Alternative D, LSR assessments should be determined and approved by the Forest Supervisor and prescribed by district-level practitioners who we believe are best suited to understand the terrain and current vegetation structure in achieving the dual goals of sustainable forest health and fire resiliency. Beyond Alternative D, we believe all LUA decisions, including Riparian Management Zone (RMZ) assessments, should be determined and approved by the Forest Supervisor. Local Forest Service staff are invested in the health and safety of area forests not only as employees, but also as residents.

We believe tree or stand age is not always the best criteria for classifying habitat for so-called "old growth dependent species". Additional factors, such as species mix and root disease, are also part of an effective overall assessment method. We believe tree diameter and adapted species are better characteristics for identifying habitat values and, in many cases, can mimic habitat often associated with historic range of variability. We recommend acknowledgement of the potential for LSR habitat features and values to be created in managed forest landscapes. Studies have shown that treatment/harvest techniques can successfully develop suitable habitat without reliance on old stands.

Additionally, we recommend steep slopes and other cost-prohibitive treatment/harvest areas should comprise the initial criteria for LSR designation as well as RMZs. The entire LSR should be treated to provide for fire resiliency so that fire does not reach into the canopy. We believe this can be accomplished without compromising wildlife habitat features and values.

Finally, we recognize the noble intent of this amendment to better incorporate the treaty rights of sovereign Tribal Nations through formal consultation and potential co-management. Within our county, the historic ceded lands of the Confederated Tribes and Bands of the Yakama Nation comprise much of what is today National Forest. We believe the Yakama Nation, with their strong record of forestry management and ownership of their own lumber mill, are a perfect example of the type of tribal partner needed in this effort. However, we also believe the successful example of other broad partnerships in our area tackling large issues, such as the Yakima Basin Integrated Plan, also can be duplicated to the success of our forested lands - and a model already exists. The formal recognition of Forest Collaboratives to deliver tailored forest-by-forest management solutions should be utilized in the place of broad rulemaking contemplated by this amendment. By creating greater regional autonomy, the present Forest Collaborative model of tribes, agencies, local governments, environmental interests, and industry can be utilized to bring all voices around the table to build mutually-supported prescriptive solutions under NWFP framework built at the mission and vision level - not at the ground level.

We wish to again thank you for the opportunity to comment on this process and acknowledge the work performed by your staff and the Advisory Committee to reach this point. The areas governed by the NWFP are a diverse landscape with many differing regional interests and needs, and we recognize the discussions required to reach a solution will continue. We remain committed along with the rest of the participants in this process to developing healthy, sustainable forests for the survival of the many species inhabiting them and the enjoyment of future generations.

ATTACHMENT-LETTER TEXT: NWFP signed letter 2746\_001.pdf; this is the same content that is coded in text box; it was originally included as an attachment