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Comments: To: USFS

Thank you for considering and hopefully taking the opportunity to make some essential amendments to the Northwest Forest Plan (NWFP). 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). There are two large production mills and many other smaller specialty mills. These mills employ family wage jobs, support our communities, and help provide economic resources to our county. The Skagit County forest product industry, community and the forest environments were crippled from the well intentions of the 1994 NWFP that targeted "long-term desired ecological conditions by maintaining vegetative conditions". We are therefore eager to move forward with amendments to that Plan to both ensure habitat protection and long-term sustainable forest industry and associated communities. We believe there should be particular focus on 1. Wildfire resilience for our forests in the northwest region of the Northern Cascades that are heavily fuel loaded and 2. Improvements in actions that will help sustain our timber communities, their infrastructure, and economics. We understand that the primary goal of the NWFP was to protect the Northern Spotted Owl (NSO), however, we question whether the consequences of the actions taken to do so did not outweigh the impacts, especially considering their continued decline and continual loss of critical habitat with a lack of forest management. Regardless, we believe meeting the five original goals of the NWFP can better be achieved if amendments follow the new scientific findings.

Since 1994, several executive orders were released based on new scientific findings (in 2021, Executive Order 14008 Tackling Climate Change and in 2022, Executive Order 14072 Strengthening the Nations Forests, Communities and Local Economics). Based on the USFS findings of changed conditions, and needing "the ability to improve resistance and resilience to fire, support adaptation to and mitigation of climate change in the NWFP landscape, address management needs of mature and old growth forests with related ecosystem habitat improvement, and contribute predictable supplies of timber and non-timber products to support economic sustainability in communities affected by forest management in the NWFP landscape" we believe appropriate alternatives need to be strategically and purposefully considered as amendments to the NWFP. The goals for the NWFP were not prioritized or weighted and should not be when developing amendments. It needs to be a wholistic approach based on the scientific findings.

In the MBSNF, not only was the amount of harvesting curtailed due to the NWFP, but then continued to be severely reduced within those areas where it should have been permitted in the past 30 years. Under these circumstances the forest health has declined to conditions that cast a high potential for future catastrophic disasters for the forest environment, neighboring communities as well as increases in carbon emissions. This was escalated when forest service roads were abandoned creating more issues both for fire suppression and recreation. Skagit County believes all types of management need to be studied including clear cutting. Benefits from this could not only potentially help protect the NSO and its habitat from fire, create fire blocks, reduce fuel loading\*, reinstate roads for access to potential future fires, start decreasing disease and ultimately bring some timber volume to our mills and economic relief to our communities.

Immediate action needs to be taken to save the forests from devastating fires like the ones we've experienced the last 7 years, which have destroyed millions of acres of forests including the NSO habitat necessary for their survival. 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.

The USFS has identified the primary threat to the NSO yet to date has been ignoring this issue. Though we agree that trying to protect the NSO could only occur by addressing the changed conditions since 1994 (which resulted in the unintended consequences of the NWFP) we then urge the USFS to fully consider the future impacts on local economics and forest health that were realized through your monitoring programs and the best

available science. While reviewing potential actions, we respectfully ask that it be considered as to whether, or not, the NSO would ever successfully return in our region and then to weigh the impacts for managing under this scenario as part of reviewing for an amendment. As you move forward with this potential amendment, we'd like to work cooperatively with the USFS to come up with a long term solution. Thank you for the opportunity to make these comments.