



Skagit County Board of Commissioners

Ron Wesen, First District

Peter Browning, Second District

Lisa Janicki, Third District

June 12, 2023

Letter sent via email

Becky Blanchard
Pacific Northwest Regional Forester's Office
Attention: Pacific NW National Scenic Trail Comprehensive Plan Comments
1220 SW 3rd Avenue, Suite 1700
Portland, OR 97204

RE: Pacific Northwest National Scenic Trail

Dear Mr. Glenn Casamassa and/or NEPA Official,

Thank you for the opportunity to comment on the Draft Environmental Analysis (EA) for the Comprehensive Plan (CP) development for the Pacific Northwest National Scenic Trail (NWNST) spanning approximately 1,200 miles between Montana and Washington and passing through Skagit County. We are generally in support of this project. This letter outlines concerns we have with the impact on forestry and maintaining forest health, specifically for fire protections (roads and fuel loading) on our US Forest Service (USFS) lands would also apply as a general concern.

We appreciate the work and effort the project team has put into drafting the Draft CP and the subsequent Draft EA, promoting the National Scenic Trail, and look forward to having it pass through Skagit County. Skagit County believes most of the elements in the Draft Comprehensive Plan and Draft EA of that document have addressed our concerns, though we believe there are several areas within these documents that the language preserving fire prevention/fighting, timber harvests/sales and existing recreational access occurring in the of past, currently and in the future needs strengthening in the Final EA and Final Comprehensive Plan so that they are realized throughout the NWNST's existence. Our concerns generally gravitate around protecting the composition of our county. Skagit County is primarily a natural resource county with over half of the lands forested (890,000 acres) and of those, 360,000 acres are working forest that support family waged jobs, wood products for housing and other uses, carbon storage, cultural resources, recreation, fish and wildlife habitat, forest product infrastructure (mills), schools, hospitals, roads, and more. It is essential that none of these activities be jeopardized. In light of that, Skagit County respectfully asks that 1. the NWNST plan not interfere with any future timber sales of **any type** (including salvage sales after a fire) that the USFS would/should implement and that trail's existence would not allow for a future argument to curtail such sales and/or harvests; 2. the roads, both current and potentially needed in the future, for fire control **of any type**, including access, not be removed impaired, or limited in construction, and 3. the roads for recreation purposes outside the trail not be closed. Though the Draft CP superficially addresses these concerns we are suggesting some stronger and/or more detailed language be added to ensure these protections in the future along the trails course.

We want the NWNST to complement and be a seamless use to the existing land uses, which appears to be supported in the Draft CP, Ch. 3, PDF pp. 37-39: Statement of the nature and purposes of this trail. The [National Trails System Act of 1968](#) says other uses along the trail (besides recreation-related facilities) may be allowed if they will not "substantially interfere with the nature and purposes of the trail" (16 U.S.C. 1246(c)). Our concern is that the Draft EA does not acknowledge impacts to communities if timber sales and/or harvesting is restricted due to the implementation of this trail and/or the predicted fires occur.

The language noting timber harvesting (and with no language whatsoever acknowledging any type of timber sale, including thinning or salvage) is very weak with only a reference in the Draft CP, Chapter 5 under Trail Closures and

Temporary Detours on p. 83 that states "Closures may be due to emergency situations such as wildfires, landslides, or flooding, or they may be due to management activities such as prescribed fire, timber harvest, restoration, or construction." We believe that such a detour could potentially be a valuable public education/outreach tool. For example, harvesting does not "interfere" with a trail, but rather the working forest provides various benefits and those could be identified on signs. It also appears you have provisions for "floating trails", which we believe would be beneficial to highlight in concert with the provisions allowing for continued existing uses that are currently allowed on those portions of the trails. It is mentioned again in Chapter 5, under Scenery (Ch. 5 pp.84-89) "In those segments of the PNT where a more primitive experience is not possible, and uses such as **forestry**, farming, ranching, working waterfronts, and commercial areas occur, they are in the appropriate locations and complement the trail's visual variety and sense of place." Skagit County believes these narrow statements are subject to unnecessary misinterpretation of eliminating any future timber sales/harvests. If the Draft EA (and subsequently the Draft CP) could more closely list or acknowledge these activities, we believe it would help for future understanding and implementation.

Upon reviewing the Draft EA and Draft CP, we believe the language is extremely weak on the need to have access roads for fire prevention/ submission and treatment. The Draft EA notes under Climate Variability and Projected Change (p.17) the average temperatures have increased, there appears to be no change in the temperature increases, and as a result "In Washington there may be increased fires, and increased extreme participation, flooding and landslides." It future notes, that "In many cases, changes in frequency and magnitude of extreme events (such as drought and severe fires) would have the most significant and long lasting consequence for land and resource management and success of restoration." The Draft CP Chapter 5, Wildland Fire and Prescribed Fire, p. 97 it should be noted under both Wildfire Prevention and Fire Management that roads are **essential for management and not subject to closures**. In fact, the Draft CP Chapter 5, Scenery, states that roads are not suitable due to affecting the scenic integrity of a scenic trail. It states "Land uses and facilities that contrast with natural settings, however, may diminish scenic quality. Development such as high-voltage transmission lines, communications towers, **and associated access roads are often visible from long distances, especially in western landscapes, and can detract from the naturalness of the trail setting and the experience of trail users, especially when these types of developments are located near the trail.**" And therefore, the Draft CP states, the trails should 1. "Address threats to scenery and restore areas near the trail that do not meet scenic integrity", and 2. "Seek opportunities to protect scenery resources on non-federally managed lands through agreements with state, county, and municipal governments and private landowners". Skagit County believes in keeping with the findings in the Draft EA under climate and fire, in certain areas, roads may be more appropriate due to fire risk imposed by those using the trail, vegetation and temperature increases. Because USFS lands can be in close proximity to homes and communities and have neighboring borders to other public and private properties, Skagit County would like assurances that any methods of fighting potential fires are not eliminated but in fact maintained. Bringing more public users along a trail in our warming climate and drought ridden forests can only escalate the chances of a fire. Also, that roads would not be closed to recreationalists in the vicinity of the trail for the sack of the and impacts to views. This section needs to address the acceptance of roads and allow their existence throughout the trail network. Roads are also important to many of the local current users of the forested landscape. There are those that the only way to see the splendid views the USFS lands have to offer is via a road. Closing roads near the proposed trail may interfere with recreationalists.

Again, thank you for the opportunity to comment and we look forward to the trail passing through Skagit County with our concerns addressed.

Sincerely,

BOARD OF COUNTY COMMISSIONERS

ABSENT

Ron Wesen, Chair


Lisa Janicki, Commissioner


Peter Browning, Commissioner