DEPARTMENT OF
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February 3, 2020

Gayne Sears, District Ranger
ATTN: Theresa Mathis, Environmental Coordinator
Newport Ranger District Office
315 N. Warren Avenue
Newport, WA 99156

Re: Kaniksu Connections "Trail" Project Comments

Dear Ranger Sears,

On behalf of the Washington State Department of Natural Resources (DNR) please accept this letter in response to the scoping notice for the Kaniksu Connections "Trail" Project.

In May 2019, Washington DNR, Washington Department of Fish and Wildlife, and USDA Forest Service signed a memorandum of understanding to advance our Shared Stewardship Investment Strategy in Washington State. The agreement focuses on three core elements: 1) establishing shared priorities, 2) conducting the right work in the right places, and 3) utilizing all available tools for active management and restoration. The Kaniksu Connections "Trail" Project is an exceptional example of Shared Stewardship and Washington DNR appreciates the leadership of the Colville National Forest and Kalispel Tribe of Indians in advancing this important work.

The Colville National Forest's use of the Tribal Forest Protection Act (TFPA) to engage the Kalispel Tribe of Indians in project planning is an exciting innovation. Working across agencies and governments is essential to addressing landscape-scale restoration across land ownership boundaries and ensuring shared decision-making in the development of project priorities that meet multiple land management objectives.

In 2017, Washington DNR worked with partner agencies and organizations, including the Colville National Forest, to develop the 20-Year Forest Health Strategic Plan: Eastern Washington. The plan is an all-lands, all-hands approach to addressing forest health and wildfire risk in the state. Development of the plan included a stakeholder driven, scientifically rigorous mapping and prioritization process that identified 34 priority areas for accelerated restoration in Eastern Washington. The Trail Project is one of the priority planning areas identified in the plan and represents a critical contribution to solving our state's forest health and wildfire crisis.

Washington DNR has invested considerable staff time and financial resources into the development of the Trail Project. DNR Federal Lands Program and Forest Health staff have engaged directly in conducting outreach to stakeholders, collecting data, and contributing to pre-National Environmental Policy Act (NEPA) analyses. DNR scientists conducted a preliminary landscape evaluation to quantify restoration needs within the planning area; and more than $500,000 of DNR state appropriations and capital dollars were awarded through a competitive grant process to fund data collection, collaborative planning, and public outreach. These public investments are intended to ensure effective and efficient compliance with NEPA and other applicable environmental laws and regulations, shared decision-making among project partners, and integration of the best available science that is informed by the interests and values of the public.

Washington DNR applauds the Colville National Forest and Kalispel Tribe of Indians for their extensive pre-scoping public engagement. It appears the input provided by the public has been considered and integrated into the purpose and need and proposed action documents that were released for public comment on January 17, 2020. The remainder of this comment letter is focused on the resource objectives identified in the purpose and need and proposed action.

The Trail Project encompasses 90,700 acres and will enhance forest health, address risk of insect and disease outbreaks, lower the potential for uncharacteristic wildland fire, meet state and federal water quality guidelines, provide quality fish and wildlife habitat, contribute to the local economy, and connect lands and people. Washington DNR supports these multiple resource objectives and encourages project partners to ensure that proposed actions will address the restoration need while maintaining social license and community support for the project.

Washington DNR supports the ambitious goals of the project to accomplish large scale restoration objectives and reduce wildfire risk to communities. The preliminary landscape evaluation conducted by DNR staff shows that alignment of restoration treatments across ownership boundaries is a key component of the scientific rationale for the project. Alignment is also critical for building and maintaining ongoing public support for large scale forest restoration in eastern Washington, and restoring forest structure and species composition to more resilient conditions across the landscape.

A key aspect of building public support for the project is ensuring that the proposed treatments and prescriptions are aligned with the results of the landscape evaluation and resource needs and thus have a solid scientific rationale. Northeast Washington Forest Coalition (NEWFC) has served as an important venue to develop agreements among diverse interests. As the project moves into the Environmental Assessment phase, we look forward to learning more about how the Colville National Forest Plan guidelines, DNR landscape evaluation, and landscape restoration principles are being used to inform the development of alternatives. In addition to addressing departure of forest structure and composition, fire risk reduction, and resilience to climatic changes, demonstrating how sufficient habitat will be maintained and created for a range of focal wildlife

species will further strengthen the project. This includes the overall amount of habitat, patch sizes and connectivity, and variability at the stand and landscape levels.

Another important component in ensuring continued broad support for the project will be to provide clear descriptions of what types of restoration activities will be implemented and what they will look like. Other agencies, tribes, public, and stakeholders should be able to understand from the environmental assessment and appendices what the long-term post-treatment desired future conditions will be. This includes what densities, species composition, and structural variability will look like on the land in the future. Implementing restoration activities that mimic historic disturbance agents and create variability at multiple scales (tree level, patch level, watershed level) will help meet the multiple economic, restoration, ecological, and social goals of the project.

A preliminary study of root disease, dwarf mistletoe, white pine blister rust, and bark beetles was conducted by Washington DNR Forest Health staff in partnership with USDA Forest Service and Kalispel Tribe of Indians in July and August 2019. The study found root disease occurring in 87 percent of the area surveyed (52 of 60 plots). Root diseases present within the planning area include Armillaria root disease, laminated root rot, heterobasidion root disease, and cedar laminated root and butt rot. In general, conducting restoration activities including reintroducing fire will enhance structural diversity and species composition and reduce risk of further spread of root disease within the planning area. Specific recommendations for each root disease present in the planning area can be found in the report, "The Trail Project: Assessment and Management of Root Diseases, Dwarf Mistletoes, and White Pine Blister Rust."

Dwarf mistletoe was found in 10 percent, and white pine blister rust was found in 7percent of plots. In both cases their presence is within an acceptable range for these sites and is not likely to be a driving factor in determining restoration objectives in affected areas. In the planning areas, fir engraver mortality was found to be particularly high from the period 2003-2005, which was when an outbreak occurred in the Northern Rocky Mountains. There were relatively low levels of bark beetle-caused mortality in the period 2011-2017, and the areas primarily affected appeared to be previously stressed by root disease. Future bark beetle outbreaks are possible within the planning area, particularly if there is prolonged drought and stocking densities remain high. The development of alternatives should consider the likely impacts of increased drought events in the near and long-term.

The Trail Project currently contains hundreds of miles of roads, which have impacted hydrology and aquatic conditions in the five large watersheds in the planning area. Washington DNR supports rehabilitation of existing roads to maintain critical access by adjacent landowners, to the public and wildfire management personnel, while also gating and decommissioning roads that may be redundant or pose risks to human safety and wildlife. Thinning riparian management areas, placement of large woody debris, culvert replacement, stream crossing restoration, hydro-stabilizing roads, and wetlands restoration will also be important to improving aquatic organism passage and the function of aquatic systems in the project area.

There are a number of important wildlife habitat activities included in the proposed action. Washington DNR supports use of prescribed fire to reduce fuels, enhance forage production, and improve wildlife habitat. Healthy wildlife populations are a sign of a healthy forest ecosystem. Efforts to maintain and enhance habitat for these important species is an important contribution to this project. The Trail Project also has the potential to play an important role in creating landscape-level habitat connectivity and corridors for species movement should be considered in project planning.

Washington DNR appreciates the inclusion of a number of recreation enhancements that will benefit motorized and non-motorized recreation users in the area. The recreation projects outlined in the proposed action reflect input from the public that was received during the pre-scoping public meetings. It is encouraging to see project proponents integrating recreation into this vegetation management project. Recreation is the primary way that the public experiences National Forest System lands, and recreation holds tremendous potential to help build broader public awareness and support for active restoration of our forest ecosystems in the state. Recreation use in the area should inform the aesthetic values associated with the prescriptions and treatments, which have the potential to influence public interest as the project moves into implementation in the coming years. As alternatives are developed, we strongly encourage the interdisciplinary team utilize visualization modeling of the landscape pre and post treatments to help stakeholders understand what the visual implications of large-scale treatments.

Reducing risk of uncharacteristic wildfire and threats to infrastructure, homes, and communities near the planning area is a primary goal of the Trail Project. Incorporating the priorities identified in the amended Pend Oreille County Community Wildfire Protection Plan will be helpful in meeting this goal. Washington DNR is encouraged by Pend Oreille County Commissioner engagement in the pre-scoping public meetings and is hopeful that project proponents will work closely with the county government to ensure that local government interests and values are reflected throughout the planning process.

Restoration activities identified in the proposed action will contribute significantly to the local economy through direct and indirect employment. Washington DNR encourages the project proponents to work closely with Northeast Washington Forest Coalition (NEWFC), other collaborative partners, and county government to develop an implementation strategy that includes a mix of stewardship contracts, timber sales, and Good Neighbor Authority projects. Utilizing all available contracting tools and authorities will help ensure that project revenue will be reinvested into restoration activities while also providing critical funding to county governments for maintenance of roads and schools, among other public services.

The robust partnerships being formed through the planning process must continue as we move into implementation and monitoring. Engagement with industrial landowners, DNR State Lands, Kalispel Tribe of Indians, and others will be important to meet landscape scale restoration goals, and coordination with Washington DNR Federal Lands Program, through use of Good Neighbor Authority, will ensure timely access to restoration sites and treatment units. Implementation

monitoring and effectiveness monitoring should be considered during the development of alternatives, and a monitoring plan should be developed prior to the implementation of the project.

Thank you for the hard work of the Colville National Forest and Kalispel Tribe of Indians staff that are making this project possible. Washington DNR is appreciative of our partnership and looks forward to the opportunity to continue to work closely on the Trail Project, and other restoration projects into the future.

Sincerely,

George Geissler

State Forester | Deputy Supervisor, Wildland Fire Management and Forest Health/Resiliency

c: Glenn Casamassa, Regional Forester, USDA Forest Service Region 6
Rodney Smoldon, Supervisor, Colville National Forest, USDA Forest Service
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