



**DEPARTMENT OF  
NATURAL RESOURCES**

**OFFICE OF THE COMMISSIONER  
OF PUBLIC LANDS**

1111 Washington Street SE  
MS 47001  
Olympia, WA 98534-7037

**360-902-1000**  
[WWW.DNR.WA.GOV](http://WWW.DNR.WA.GOV)

July 22, 2022

Susan Piper, District Ranger  
Pomeroy Ranger District  
71 West Main St.  
Pomeroy, WA 99347

ATTN: Alison Arnold

Re: Sunflower Insect and Disease Project

Dear Ranger Piper,

On behalf of the Washington State Department of Natural Resources (DNR) please accept this letter in response to the scoping notice for the Sunflower Insect and Disease Project.

In 2017, Washington DNR worked with partner agencies and organizations including the Umatilla 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, to date, has identified 39 priority landscapes for accelerated restoration in Eastern Washington.

The Touchet-Mill Priority Landscape is one of the 39 priority planning areas, and is immediately adjacent to and overlapping with the Sunflower Insect and Disease Project on the Umatilla National Forest. As part of the 20-Year Forest Health Strategic Plan and associated DNR Forest Health Assessment and Treatment Framework, DNR scientists conducted a landscape evaluation to quantify restoration needs within the Touchet-Mill planning area. The landscape evaluation results show that approximately 24-30% of forested acres in the planning area need restoration treatments in order to promote landscape resilience and forest health. The Sunflower Project represents a critical contribution to accelerating forest health treatments and reducing risk of drought, insect and disease, and uncharacteristic wildfire in the Touchet-Mill priority planning area and adjacent forestlands. DNR encourages the Umatilla National Forest to conduct treatments at a scale commensurate with stand level and landscape-level restoration needs.

Washington DNR supports the Purpose and Need and Proposed Action elements of the Sunflower Insect and Disease Project, including:

- Reduce basal area and stand densities and shift species composition to promote resistance and resilience to drought, insects and disease, wildfire, and climate change.
- Create openings that support natural reproduction of drought and fire tolerant species such as Ponderosa Pine and Western Larch.
- Replace non-functional culverts and thin in Riparian Habitat Conservation Areas (RHCAs) to promote the health and resilience of aquatic systems and ecosystem function.
- Slash abatement, including addressing activity fuels that may contribute to insect activity or future fire behavior.

- Sustain local economies, including local forest products industries, by supplying timber products for utilization.
- Noxious weed treatments and other practices to reduce risk of spread of invasive species.

The Scoping Notice is silent on the topic of prescribed burning. Washington DNR supports the use of prescribed fire, as appropriate, to reduce fuels and promote the health and resilience of forest ecosystems. If prescribed fire will be used as a management tool in the Sunflower area, as either part of this decision, or the Phase 5 project, please clarify that in future project documentation.

A key aspect of building public support for forest health projects is ensuring that the proposed treatments and are aligned with local partners, landowners, and stakeholders engaged in this work. DNR serves as a member of the Northern Blues All-Lands Restoration Partnership. We encourage the Umatilla National Forest to continue to engage in the Partnership and share project updates and information as relevant and useful to our collective efforts. The robust partnerships being formed will need to continue as we move into implementation and monitoring. Implementation monitoring and effectiveness monitoring should be considered during the development of the Sunflower project, and a monitoring plan should be incorporated into implementation planning for the project. The Partnership may be able to support Forest Service efforts related to implementation and monitoring planning.

Washington DNR appreciates the leadership of the Umatilla National Forest in advancing Shared Stewardship, and the Umatilla National Forest's utilization of the Insect and Disease Categorical Exclusion. Your collaborative approach to project planning, public outreach and engagement, and science-based restoration aligns with the state's Shared Stewardship Investment Strategy, 20-Year Forest Health Strategic Plan: Eastern Washington, and State Forest Action Plan, among other strategic plans and guiding documents.

Thank you for the opportunity to comment on the Sunflower Insect and Disease Project. Washington DNR looks forward to the opportunity to continue to work closely with the Umatilla National Forest.

Sincerely,



George Geissler  
State Forester  
Washington State Department of Natural Resources