DEPARTMENT OF NATURAL RESOURCES

Forest Resilience Division
1111 WASHINGTON ST SE
OLYMPIA, WA 98504-7073

360-902-1300
WWW.DNR.WA.GOV

March 6, 2023

Gretchen Smith, District Ranger
Mount Baker Snoqualmie National Forest
Darrington Ranger District
1405 Emens Ave. N.
Darrington, WA 98241

RE: North Fork Stillaguamish DRAFT Environmental Assessment

Dear Ranger Smith,

The Washington State Department of Natural Resources (DNR) appreciates the comprehensive thought and work that went into the draft environmental assessment for the North Fork Stillaguamish project area on the Mount Baker-Snoqualmie National Forest. This watershed and proposed project area lies within a priority landscape established in Washington's Forest Action Plan. The Forest Action Plan identifies areas where active management and investments can improve forest health conditions based on scientific analysis, as well as where partnerships exist to maximize funding and leverage resources. The Forest Action Plan recognized that the North Fork Stillaguamish watershed not only had unique state, tribal, federal, and local collaborative partnerships but presented opportunities to benefit drinking water supply, improve fish and wildlife habitat, and address an overabundance of mid-seral forest. The overabundance of mid-seral forest provides an opportunity to improve forest health, structure, and function through active management.

We support the project's Purpose and Need as presented in the draft environmental analysis. We applaud the coupling of landscape-level analyses with project-specific recommendations in this draft environmental assessment. We appreciate the specific opportunities raised and evaluated around water quality and quantity for the project, as well as species-specific habitat conditions complementing waterway network assessment data considerations. We acknowledge and appreciate the thought that went into exploring management alternatives (and associated habitat and structural expected corollaries to these decisions) in this project to reduce the current overabundance of mid-seral forest.

Through review of the draft environmental analysis, we submit the following comments:

- We support the amount and types of forest management activities proposed in Alternative 2. The proposed treatments as described in Alternative 2 are primarily focused on increasing forest health and resilience and are consistent with the two research themes of the Finney Adaptive Management Area: the Restoration of Late-Successional Forest and the Restoration of Riparian Habitat Conditions.

- Alternative 2 proposes, upon Regional Ecosystem Office (REO) review, cutting and removal of trees between 20"-26" DBH within variable density thinning treatment units to meet stand objectives for late successional habitat and the recommendation is based in part on a results from collected data on a past neighboring project. The final EA should integrate or provide access to a reference of this collected data. As the analysis indicates this is a highly productive site where trees grow faster, and therefore DBH is not a direct correlation to age - the final EA should specify whether age will be considered in the prescriptions for these stands (i.e. all old trees will be conserved). We recommend reference to the publication *Identifying Mature and Old Forests*, which our agency uses to inform management of mature and old forests. Finally, the EA suggests that this will occur in stands "*within Alternative 2 where trees over 20 inches in diameter at breast height (DBH) are abundant and inhibiting the prescription from reaching density objectives, removal of these trees up to 26 in DBH would occur to better meet the treatment objective of 35% of SDI max."* The final EA should define the direction that national forest staff will use to spatially identify these stands, and include an example unit from the project area (or the neighboring project collected data) where this is the case that can demonstrate the need.

- We suggest that Alternative 2 misses important opportunities for the forest to better address resource risks of existing roads and move towards a sustainable road system. Table 16 indicates multiple road segments that pose high aquatic risk and are not indicated as important for future access to thinning units and/or rock pits, that Alternative 2 proposes to keep in the system rather than decommission. It is important to utilize this opportunity while we are in the watershed to strive to reduce resource impacts of the road system through the full spectrum of road management choices and move towards a road system that the national forest can afford to maintain and manage into the future. The Stillaguamish River and the Sauk River are both Tier 1 Key Watersheds on Federal land, providing, or expected to provide, high-quality refugia habitat for maintenance and recovery of at-risk stocks of anadromous salmonids and resident fish species and the draft environmental analysis noted that "road and trail conditions" were one of the identified limiting factors.

- In regards to road management and invasive species, the draft environmental analysis stated that "*Decommissioning of temporary roads and closing of system roads would have the greatest effect of limiting the continued disturbance under which invasive plants thrive as well as stop the route of entry into new areas previously un-infested. Road decommissioning, or in some cases closure, would reduce the spread of invasives if current forest policy continues so that plants are treated prior to decommissioning or closure is implemented. Conversely, if invasives cannot be treated or restoration has not taken place prior to closure, lack of access could prevent future treatment or restoration of infested sites."* We strongly encourage the forest to treat invasives prior to decommissioning or closure is implemented as part of this project decision, despite

any policy changes. If costs are associated with this that need to be covered, please disclose them in the final analysis.

- We appreciate the variety of specific climate mitigation and adaptation actions included in both alternatives within this draft environmental assessment, especially those actions that will improve the potential effects of drought. We found the drought-specific examples in the climate sensitives section thoughtful, but appreciated the additional details in other sections of this draft assessment that outlined how actions like beaver dam analog creation, underburning, and variable density thinning impacted drought-related conditions, such as the presence/absence of fish-bearing streams, water retention, and insect-related tree mortality.

- We were disappointed with the lack of monitoring questions and plans for this project. Given the importance of Adaptive Management Areas for research tied to specific themes to ensure we are learning from our management actions, monitoring and related research should be a key deliverable of this project in addition to meeting the purpose and need. While we agree that monitoring for tree regeneration is important for this project, we encourage adding more monitoring questions and plans. The climate change portion of this draft assessment outlines that the rain-dominated hydrology of the North Fork Stillaguamish is particularly vulnerable (in many areas) to the expected 1.5 degree temperature increase projected for the area by mid-century. Coupling this with the variety of species of concern and interest, as well as special status plants in this project area, we strongly support additional monitoring plans, as this data can provide the localized level of information needed to truly assess the success of management decisions in the North Fork Stillaguamish.

- Additionally, where this project is taking management actions that warrant REO review (i.e. removal of trees 20-26" DBH) and/or are in areas where the draft environmental analysis noted science is lacking (i.e. impact and results of management to improve forest structure in riparian reserves), clear monitoring plans should be associated. The Finney Adaptive Management Area (AMA) affords this project area forest management flexibility; to fully take advantage of this flexibility, we recommend additional monitoring to better assure that forest and aquatic restoration outcomes are sustainably met and that lessons learned inform future project planning and implementation.

- We commend the variety of agencies and persons consulted for this draft environmental assessment. We particularly appreciate your consultation with the Samish Indian Nation, Sauk-Suiattle Tribal Council, Stillaguamish Tribe, Swinomish Tribal Community, Tulalip Tribes, and Upper Skagit Tribal Council, as well as your acknowledgement that contemporary delineations are not full reflections of traditional territories, nor do they encompass the diversity of current Indigenous practices and needs within the North Fork Stillaguamish landscape. We agree that tribal input is important to protect and enhance the resources and access for cultural rights, especially given the project focus on a habitat enhancement for an important First Food: huckleberry (*vaccinium membranaceum*).

DNR thanks your team for its leadership on planning forest restoration activities in this high priority landscape. We look forward to our continued partnership to improve forest health and promote resilient landscapes for this project area and throughout the Puget Sound. DNR stands ready to continue our work with the US forest Service and partners to plan, implement, and monitor forest restoration activities that will improve the health and resilience of the project area.

Sincerely,

George Geissler
State Forester & Deputy, Wildland Fire Management

c: Ashley Blazina
Chuck Hersey