



**DEPARTMENT OF
NATURAL RESOURCES**

State Forester

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May 25, 2023

Chris Furr
District Ranger
Okanogan-Wenatchee National Forest
Methow Valley Ranger District
c/o Meg Trebon
24 West Chewuch Road
Winthrop, WA 98862

RE: Midnight Restoration Project Scoping Comments

Dear Mr. Furr,

The Washington State Department of Natural Resources (DNR) would like to thank the Okanogan-Wenatchee National Forest (OWNF) and the Methow Valley Ranger District for commencing environmental planning activities designed to increase the resilience of the Midnight Restoration Project area. The watersheds comprising the project area are a high priority for the State of Washington as identified through the data-driven prioritization conducted by DNR in the state's 20-Year Forest Health Strategic Plan. DNR stands ready to continue our work with the US Forest Service to plan forest restoration activities that will improve the resilience of the project area to natural disturbances and climate change. Under our Shared Stewardship MOU with the US Forest Service, we are interested in working to further our common goals in this planning area in an all-lands context from planning through implementation. Our staff are also engaged in this project development through our participation in the North Central Washington Forest Health Collaborative and partnerships with local fire adapted communities.

We strongly support the four identified needs for action to guide this project, and we appreciate the integrated approach to addressing them that this landscape scale project presents.

- To address Needs #1 Move Current Vegetation Structure, Spatial Patterns, and Composition Toward Desired Reference Conditions, #2 Wildlife Habitat, & #4 Reduce Wildfire Risk we support the proposed actions as broadly outlined at this time for vegetation management on the approximately 28,000 acres under evaluation for

commercial and noncommercial thinning prescriptions, prescribed burning and other vegetation treatments to meet project goals. DNR recommends that the OWNF address as much of the vegetation restoration need identified in the landscape evaluation as possible to return conditions to the historical range of variability, to reduce the risk of severe wildfire and other disturbances, and to protect lives, communities, and ecological values. We have identified drought as an important current and future threat to forest health and resiliency, and the proposed actions will make the project area more resilient to a hotter and drier future.

Research from across the interior west¹ has shown that mechanical treatments that remove trees are the most effective at reducing density, fuel loads, and crown fire risk, especially when followed by prescribed fire. Non-commercial and fire only treatments can accomplish these goals, but require allocation of limited treatment dollars and often necessitate multiple entries to sufficiently reduce fuels. In addition, goal 3 of the 20-Year Forest Health Strategic Plan recognizes the importance of rural economic development in achieving our broader forest health goals by encouraging forest restoration and management strategies that maintain and attract private sector investments and employment in rural communities. DNR encourages the OWNF to address as many of the forest health treatment needs in the project area as possible through viable commercial treatments in order to achieve ecological, economic, and social goals.

Climate change, specifically the projected increase in drought stress that is likely to occur over the next few decades, will continue to add stress to forests in the project area and make them less resilient to natural disturbances such as fire, insects and disease. DNR's landscape evaluation for the project area finds that moisture deficit levels for some of the current moist forest in the project area will shift to dry forest levels from year 2040 to 2070 and some of the current dry forests will shift to non-forest types from year 2040 to 2070 as well. The increase in drought stress over time in the project area is another reason to restore forests in the project area at a large enough scale to be resilient to both the current and future climate.

- We agree with Need #3 to “Provide an affordable, safe, and efficient transportation system and reduce sedimentation from roads on National Forest System lands”, including the use of a variety of tools to address the need from hazard tree removal to road improvements, closures, and decommissioning. Please keep in mind the importance of

¹ Fulé, P. Z., J. E. Crouse, J. P. Roccaforte, and E. L. Kalies. 2012. Do thinning and/or burning treatments in western USA ponderosa or Jeffrey pine-dominated forests help restore natural fire behavior? *Forest Ecology and Management* 269:68–81.

Martinson, E. J., and P. N. Omi. 2013. Fuel Treatments and Fire Severity: A Meta-Analysis. USDA Forest Service Rocky Mountain Research Station: Research Paper. RMRS-RP-10.

Stephens, S. L., B. M. Collins, and G. Roller. 2012. Fuel treatment longevity in a Sierra Nevada mixed conifer forest. *Forest Ecology and Management* 285:204–212.

maintaining sustainable access for recreation, forest management, and emergency management consistent with maintaining healthy watersheds and an efficient transportation system.

We appreciate the transparency and need for potential project level forest plan amendments as outlined in the scoping letter. Within the Late Successional Reserve and Forest Plan Old Growth, we agree that the science supports treatments within these stands to reduce risk and help these stands meet their late successional structure goals. For fuelwood gathering in the Late Successional Reserve where the amendment would allow for fuelwood gathering in limited areas of fuels reduction units that lie outside of timber sale units we'd appreciate greater details on the geographic extent of areas included, approach to designate fuelwood available (live, stand, standing, or piled), and implementation monitoring.

DNR NE Region State Lands unit manage land in the project area. Please let us know if additional early coordination on access or landscape scale planning is beneficial.

Aquatic restoration activities to improve watershed health and aquatic habitat functions is a clear need in the project area. DNR fully supports addressing both the upland and aquatic restoration needs in this project area as quickly as possible and at the relevant scale and locations needed. We understand aquatic restoration activities are currently being planned and implemented by the US Forest Service, Tribes and other partners in the project using programmatic NEPA tools. We recommend briefly mentioning and summarizing planned aquatic restoration work as you communicate with the public about this project so they understand the US Forest Service is holistically addressing both the aquatic and vegetation restoration needs in the project area.

Finally, monitoring at the stand and landscape scale is a critical component of DNR's 20-Year Forest Health Strategic Plan. We would like to see specific direction included in the decision for a monitoring plan for this project, which we hope will integrate well with our efforts.

DNR thanks your team and the OWNF 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 eastern Cascades.

Sincerely,

A handwritten signature in black ink, appearing to read "George Geissler", with a long, sweeping underline.

George Geissler
State Forester
Deputy Supervisor for Wildfire
Washington State Department of Natural Resources