



**DEPARTMENT OF  
NATURAL RESOURCES**

**Forest Resilience Division**

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May 13, 2024

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 Draft Environmental Analysis Comments

Dear Ranger 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 analyzing forest restoration 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. DNR supports the 16,375 acres of understory vegetation treatments, 12,012 acres of overstory treatments and 28,387 of prescribed fire proposed in the draft environmental assessment to restore resilient forest conditions. Significant restoration need exists in the project area and the scale and type of proposed vegetation treatments will address a substantial proportion of that need.

Research from across the interior west<sup>1</sup> 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 OOWNF 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. DNR agrees with Need #3 to “Provide an affordable, safe, and efficient transportation system and reduce sedimentation from roads on National Forest System lands”, including the proposed activities to address the need from hazard tree removal to road improvements, closures, and decommissioning. Please keep in mind the importance of maintaining sustainable access for recreation, forest management, and emergency management consistent with maintaining healthy watersheds and an efficient transportation system.

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. DNR recommends marking a representative sample of treatment units across different forest types and treatment prescriptions to translate the proposed treatment descriptions in the draft environmental analysis into reality for the broad suite of US Forest Service staff, contractors, partners and community members involved in the project. Marking a subset of representative

Chris Furr

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<sup>1</sup> 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.

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treatment units will lead to effective treatment implementation among US Forest Service and contractors involved in the project as well as serve as an outreach and educational opportunity for community members to better understand how guidelines are being applied pre and post treatment.

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 and Deputy Supervisor for Wildland Fire Management

cc: Chuck Hersey