



**DEPARTMENT OF
NATURAL RESOURCES**

Forest Resilience Division

1111 WASHINGTON ST SE
MS 47013
OLYMPIA, WA 98504-7001

360-902-1000
WWW.DNR.WA.GOV

November 1, 2024

Gifford Pinchot National Forest
c/o District Ranger Erin Black
Mt. Adams Ranger Station
2455 Highway 141
Trout Lake, WA 98605

RE: Little White Salmon Forest Resiliency and Fire Risk Mitigation Project

Dear Erin Black,

Please accept this comment letter on behalf of the Washington State Department of Natural Resources (DNR). DNR's mission is to manage, sustain, and protect the health and productivity of Washington's lands and waters to meet the needs of present and future generations. Washington's Commissioner of Public Lands, who leads DNR, is designated as the state lead for all forest health issues (RCW 76.06.150).

DNR is a partner in Shared Stewardship with the USDA Forest Service. Our agencies are working extensively together to plan, implement, and monitor forest management and restoration projects on National Forest System lands in Washington State. USDA Forest Service manages nearly half of all forestlands in eastern Washington, and Forest Service stewardship and management decisions play a critical role in achieving the goals identified in the Washington State Forest Action Plan, 20-Year Forest Health Strategic Plan: Eastern Washington, and Shared Stewardship Investment Strategy, among many other federal and state strategic initiatives. Our partnership is critical to achieving DNR's mission and to serve the lands, waters, and communities of Washington State.

The Little White Salmon Forest Resiliency and Fire Risk Mitigation Project is an exceptional example of Shared Stewardship and cooperation towards our shared goals. The Little White Salmon watershed is identified as a priority planning area in the 20-Year Forest Health Strategic Plan: Eastern Washington. The project as described in the draft Environmental Assessment will significantly contribute to the successful implementation of the 20-Year Forest Health Strategic Plan: Eastern Washington and State Forest Action Plan.

The Little White Forest Resiliency and Fire Risk Mitigation Project utilizes the best available science and leading scientific research. The project proposal aligns with the results of the DNR landscape evaluation and leverages the results of a fire modeling study conducted in partnership with DNR and Gifford Pinchot National Forest scientists and fire management staff. The most

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recent Quantitative Wildfire Risk Assessment (QWRA) further demonstrates the need for fuels reduction and proactive stewardship in the watershed. The QWRA results shows high burn probabilities for eastern portions of the Little White planning area, which is a focus of treatments in the Resilience Block in the Little White project.

The proposed treatments align with the Purpose and Need for the project and are focused on the portions of the planning area that have been identified to be most at-risk to future wildfire, drought, and climate change impacts. One potential change that the Forest Service should consider is the classification and treatment of “Mature and Old Growth Forest Understory Fuel Management.” Many of these stands do not meet old growth definitions and should be considered for “Mature Forest Thinning – Forest Resilience” treatments, especially those stands near the Oklahoma Road, private property, and along high priority potential control lines (PCLs). Increasing treatment intensity to reduce overstory densities and shift forest structures will better meet the Purpose and Need and improve treatment effectiveness, which is critically important near the values at risk in the project area.

The Forest Service commitment to multi-party monitoring and adaptive management is an important component of the implementation strategy for Little White. Local project partners will be conducting implementation monitoring and effectiveness monitoring over time to evaluate treatment outcomes. The monitoring partnership between Forest Service, DNR, and members of the South Gifford Pinchot Forest Collaborative is an exciting opportunity to continue shared learning through project implementation.

DNR strongly supports the Little White Salmon Forest Resiliency and Fire Risk Mitigation Project. We commend the Gifford Pinchot National Forest for their leadership in advancing this project. The project will significantly contribute to our statewide efforts focused on landscape resilience and wildfire risk reduction and aid in climate adaptation and future wildfire management in the Little White Salmon watershed.

Thank you for your consideration of these comments. We appreciate the invitation and opportunity to work with the Forest Service in the spirit of Shared Stewardship of our forests, and we look forward to continued work together.

Sincerely,

A handwritten signature in black ink, appearing to read "George Geissler", with a stylized flourish extending to the right.

George Geissler
State Forester and Deputy Supervisor for Wildland Fire Management

c: Chuck Hersey, Andrew Spaeth