

From: [Kokos, Sonja R](#)
To: [Weil, Jody - FS, WA](#)
Cc: [Vacirca, Richard - FS, WA](#); [Armbruster, Jason - FS, WA](#); [Lieske, Tim - FS, WA](#); [Shelley, Melissa - FS, WA](#); [Gratton, Elizabeth \(Betsy\)](#); [Solberg Schwab, Lisa M](#); [Crider, Kimberly K](#); [Garnett, Jeffrey A](#)
Subject: RE: [EXTERNAL] Requesting formal concurrence for NF Stillaguamish Landscape Restoration Project consultation
Date: Wednesday, April 9, 2025 3:17:30 PM

Hi Jody,

We have reviewed the January 2024 biological assessment (BA) for the NF Stillaguamish landscape project (Project). We acknowledge there are consistencies in the proposed Project activities and the activities analyzed in Western Washington Restoration Collaboration Zone Programmatic Biological Opinion (WWRCZ PBO). However, as discussed and acknowledged below, there are several activities that lie outside of activities analyzed in the WWRCZ PBO. These outliers include the following: beaver enhancements, adding large wood to channels, and road decommissioning. On April 3, 2025 Mount Baker-Snoqualmie National Forest (MBS) stated their intention to use the aquatic restoration programmatic consultation pathway, known as ARBO II for these outlying activities.

For the remaining Project activities covered under the WWRCZ, MBS has committed to adhere to the following measures for implementation:

- 1) Implement all applicable WWRCZ PBO project design criteria (PDC) and any other requirements associated with the WWRCZ PBO.
- 2) In instances where the PDCs proposed in the January 2024 Project BA were more conservative than PDCs in the WWRCZ PBO, MBS has committed to implementing the more conservative PDC to minimize Project effects.

Considering the coverage of outlying Project activities under ARBO II, the activities and level of effects analyzed in the WWRCZ PBO, and the commitment to implement WWRCZ PBO PDC or more conservative PDC proposed in the Project BA, we concur that the proposed Project activities are consistent with and can be covered by the WWRCZ PBO and ARBO II.

Please let us know if you have questions.

Best,
Sonja

Sonja Kokos, Assistant Field Supervisor
US Fish & Wildlife Service
Washington Ecological Services
Office/Cell: 360-280-0392
Email: sonja_kokos@fws.gov
Office website: <https://www.fws.gov/wafwo/>

From: Weil, Jody - FS, WA <Jody.Weil@usda.gov>
Sent: Thursday, April 3, 2025 5:03 PM
To: Kokos, Sonja R <sonja_kokos@fws.gov>
Cc: Vacirca, Richard - FS, WA <richard.vacirca@usda.gov>; Armbruster, Jason - FS, WA <jason.m.armbruster@usda.gov>; tim.lieske@usda.gov; Shelley, Melissa - FS, WA <melissa.shelley@usda.gov>
Subject: [EXTERNAL] Requesting formal concurrence for NF Stillaguamish Landscape Restoration Project consultation

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As you know, we had come to an agreement last fall that the forest would use the new WWRCZ programmatic as the consultation pathway for the N.F. Stillaguamish landscape project rather than have the FWS continue working on this as a project specific consultation via our BA submitted last January. We had agreed this would be a benefit to both entities due to the workload of the FWS and the implementation timeline the Forest needs to keep.

To review, not all actions outlined in our January 2024 BA for NF Stillaguamish project will be covered by the WWRCZ Programmatic Consultation. Specifically AOP's, beaver enhancements, adding large wood to channels, road decommissioning, and road closures will all be using ARBO II as the consultation pathway. It is the vegetation management and associated road work actions that we would cover using the new programmatic. MBS will incorporate all applicable PDCs from the WWRCZ BA/BO into these actions, and will continue to use accompanying PDCs outlined in the January 2024 BA that are more conservative than the WWRCZ BA/BO such as the riparian no cut buffers (which are larger than those found in the WWRCZ consultation).

I am therefore requesting a formal email or letter from FWS to serve as the project level concurrence per consistency process of the WWRCZ consultation. This concurrence will serve to document the programmatic consultation process has taken place and be part of our NEPA project file/record. For MBS, a concurrence email or letter would also document agreement that these actions in the N.F. Stillaguamish project are consistent with the WWRCZ programmatic so that I can then proceed with signing the NEPA decision.

The MBS Level I Team (which now will include added efforts from Gifford-Pinchot NF) has been

discussing and now working on an updated Project Consistency Worksheet/Form for the new programmatic consultation. Formulation of an updated worksheet/form will certainly include FWS and NMFS Level I Team members. Once complete and agreed to, MBS NF will then actively utilize that tool on a number of upcoming ESA consultations.

Thanks for your consideration in this matter.

-Jody

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NF Stillaguamish Landscape Project - Consistency with WWRCZ and ARBO II E

Actions in the December 2023 BA's and NEPA DN/FONSI - put under WWRCZ ESA Consultation :

TERRESTRIAL RESTORATION

Outside of Riparian Reserves				
<i>Action</i>	<i>Acres</i>	<i>Miles</i>	<i>No. Sites</i>	<i>Comments</i>
Variable Density Thinning	Up to 8,842			
Huckleberry Enhancement – Non-commercial Thinning	Up to 300			
Stand Improvement – Non-commercial Thinning	Up to 1,275			
Inner Riparian Reserves				
Perennial Fish Bearing Variable Density Thinning		12		No-cut/riparian protection buffers include: Fish Bearing (Perennial and Intermittent) - 150 ft Perennial Non-fish Bearing - 150 ft Intermittent Non-fish Bearing - 50 ft
Perennial Non-fish Bearing Variable Density Thinning		49		
Intermittent Variable Density Thinning		91		
Riparian Reserves Stand Improvement - Non-commercial Thinning				
Perennial Fish Bearing		4		
Perennial Non-fish Bearing		23		
Intermittent		57		
Temporary Road Construction				
New temporary road construction		19		All temporary roads would be decommissioned post project

Temporary road on unclassified roads with existing road prisms		39.64		
Temporary road on previously decommissioned roads		4.3		
Estimated Existing Unclassified Roads- for temporary use		39.64		
Estimated New Temporary Roads- Logging System		19.13		
Road Maintenance for Timber Haul				
ML 1 - Basic custodial care (Closed)		112.63		ML = Maintenance Level
ML 2 - High clearance vehicles		62.13		
ML 3 – Suitable for passenger cars		79.41		
ML 4 – Moderate degree of user comfort		0		
ML 5 – High degree of user comfort		0		
Road Management - Other				
Rock pits			7	Less than ½ acre at any one site
Danger Tree Removal				Perform as needed
Recreation				
Dispersed Camping			Up to 10	Provide picnic table, fire rig and natural boundary of the site.

Fuels Treatment		Could be possible on any of the 10,417 acres of VDT but only be a small fraction of that would be burned and over several consecutive years.		Following all thinning activities, a variety of fuels treatment would be applied to reduce ground fuels, lower fire risk etc. All projects will be in accordance with air quality and smoke guidelines and PDCs. The fuel treatment types include hand piling (1,600 ac); machine piling (3,000 ac); and Rx burning (500 ac). Possible fuels treatments per year range from 400 - 500 acres.
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Actions in the December 2023 BA's and NEPA DN/FONSI - put under ARBO II ESA Consultation (per previous Level I agreement) :

Aquatic Restoration				
Aquatic Organism Passage			Up to 30	
Instream Wood Placement			Up to 12	2-4 tree >20 in DBH per site
Beaver Habitat Enhancement			Up to 7	
Road Decommissioning			12.12	