



**DEPARTMENT OF
NATURAL RESOURCES**

Forest Resilience Division
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May 12, 2022

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

RE: North Fork Stillaguamish Landscape Evaluation

Dear Ms. Smith,

The Washington State Department of Natural Resources (DNR) appreciates your leadership and initiation of environmental planning activities designed to increase the terrestrial and aquatic resilience of national forest lands in the North Fork Stillaguamish watershed 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. This 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. 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.

We appreciate the landscape-scale approach to your analysis, and request that the environmental assessment articulate the analysis methodology used to bring a landscape evaluation to site-specific recommendations for action. Your forest successfully presented this approach in a similar conditional NEPA project further south in the Snoquerra Landscape Assessment, and lessons learned from that project should be carried forward as the forest continues working at landscape-scales and develops a restoration strategy. We attach for reference your 2016 restoration memo which we are committed to implementing with you, and a 2017 *Westside Forest Restoration Strategy* memo that members of your national forest developed in collaboration with DNR staff and other colleagues.

In reviewing the public scoping letter for proposed action in the North Fork Stillaguamish project area, we strongly support the landscape approach to analysis, the purpose and need, and the proposed actions. The proposed aquatic and terrestrial restoration actions are commensurate with landscape-scale restoration needed to restore healthy and resilient forest and aquatic ecosystems in the project area. Since this project area is in the Finney Adaptive Management Area (AMA) we encourage and support using the forest management flexibility afforded by the AMA to achieve forest and aquatic restoration outcomes. As you develop the environmental assessment for this project, we suggest developing a robust monitoring section that defines the relevant monitoring questions and outlines a monitoring plan for the project.

Our *2021 Forest Health Highlights* report underscored the impacts of drought on forest health across our state. We would request that the project specifically identify and analyze potential drought mitigation actions that can improve the landscape's natural ability to hold water, and increase watershed and forest resilience. US Forest Service Region 6 has been a leader in hosting workshops and developing guidance on drought mitigation strategies for the landscape scale, and the project should benefit from integrating this work.

As this project deals directly with the habitat of a highly important cultural First Food, *vaccinium membranaceum* and associated species, we strongly recommend including tribal input from all tribes with ceded and traditional territory in the North Fork Stillaguamish. We also recommend including tribal input on all components of this project scope. For example, tribal input is acknowledged in proposed road decommissioning decisions, but is left out of the trail decommissioning and mixed use road decisions, both of which can affect access routes to Indigenous harvest sites.

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.

Sincerely,

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

George Geissler
State Forester & Deputy Supervisor for Wildland Fire Management