



January 4, 2019

Martie Schramm, District Ranger
Snoqualmie Ranger District
902 SE North Bend Way
North Bend, WA 98045

Re.: Snoquera Landscape Analysis project – Draft Environmental Assessment

Dear Ranger Schramm,

On behalf of Conservation Northwest, this letter serves as our comments on the Draft Environmental Assessment for the Snoquera Landscape Analysis project. Conservation Northwest supports the work of Mount Baker Snoqualmie National Forest towards improving landscape scale conditions for wildlife, improved watershed functions, and balance between protecting natural resources and tribal and public access for cultural and recreational opportunities.

We maintain our continued interest in the project, as we have submitted comments for the Snoquera Landscape Analysis Scoping period as well as the Greenwater ATM, which area is included in the Snoquera project. Conservation Northwest has leveraged funding and public support to connect, protect and restore wildlife species and habitat in the Pacific Northwest for almost 30 years. We aim to work collaboratively with land managers, user groups, and stakeholders towards more highly functioning watersheds and resource conservation. We represent over 4,000 members and over 10,000 activists and online followers whom are interested in wildlife conservation, habitat restoration and connected core areas as well as our public lands.

We strongly support the Mount Baker Snoqualmie National Forest in taking much needed action through landscape level restoration and we recognize that there is room for improvement, as this is an opportunity to make meaningful impact on the long-term trajectory of improving watershed function. Conservation Northwest is invested in the restoration of the Green and White River watersheds, both of which influence the health of Puget Sound, provide water to nearby municipalities, habitat to wildlife, refugia to aquatic organisms, and opportunities for people to recreate and connect with the nature.

Purpose and Need for Action

The need for action has been identified as the “*discrepancy between the existing conditions and the desired conditions*” and we provide our support of the “*need to balance improving terrestrial and aquatic conditions while providing a variety of recreational opportunities*”. For proposed



terrestrial restoration, we support the goal of *“accelerating the development of old-growth and late-successional habitats by promoting structural diversity in young stands and improvements made to nesting, roosting, and foraging habitat, and increased biological complexity”*. We support the purpose and need for aquatic restoration, which includes modifying the transportation system to improve the health of streams, increase large wood components, reduce road impairments and remove barriers to aquatic passageways. The purpose and need would largely benefit from language that includes the importance of watershed restoration, improved water quality to downstream communities, of which depend on these watersheds for their drinking water, and landscape level improvements to watershed resiliency in the face of climate change through decreased road density and measurable improvements to existing watershed impairments.

Proposed Action

Our organization supports the landscape level restoration actions in the proposed alternatives, but feel that they fell short of taking full advantage of the opportunity to leave this landscape in a sustainable condition specifically regarding watershed function, security wildlife habitat, and long term resiliency. Before a final EA we suggest changes to an existing alternative to: increase the treatments to improve watershed function and wildlife security habitat, analysis to address issues we raise in this letter, a clear authority to address the unauthorized roads in the project area (both documented and undocumented), and a commitment to subsequent all-land owner effort to address roads in the Upper Green.

Regarding proposed actions for “Terrestrial Restoration”, we submit:

We support MBSNF’s use of variable density thinning (VDT) to accelerate the development of late-successional and old-growth habitats. We suggest the following clarification for tree retention criteria for heavy thin areas in VDTs: while we agree that Douglas-fir are a good choices for retention trees in heavy thins, but also include other long-lived sun-tolerant species in the dominant cohort with a high proportion of live crown (at least 30% or greater). Select retention trees based on tree characteristics rather than even spacing.

While Matrix land management allocation does not require retaining trees greater than 20” DBH, to promote old tree and structural characteristics, we encourage MBSNF to retain the largest 10% to 20% of trees (using a diameter limit based on stand exam data). Concerning retention of trees over 20” DBH, the wildlife report states that no trees of this size or greater would be removed in Critical Habitat. Critical Habitat can often overlap Matrix and AMA lands and is not confined to just LSR land. The EA does not contain a map that clearly represents these designations and their overlap and needs to clarify this in the analysis where no diameter limit exists.

In Elk Forage habitats, we encourage the MBS to consider methods that achieve the main elk forage habitat objectives while also retaining edge habitat ecological benefits. Some options include irregularly shaped boundaries to increase edge habitat and visual screens, choosing retention trees using similar criteria to that used in the VDT heavy thin treatments, and planting native forage species.



We support the planting approach for the Norse Peak burn area and the proposed VDT and non-commercial thinning actions within Northwest Forest Plan (NWFP) Riparian Reserve buffers.

In Huckleberry Land Exchange areas where low canopy cover is part of the long-term management objective, sediment runoff following prescribed fire. Please address sedimentation risk and how to avoid or mitigate those risks where prescribed fire may take place.

Regarding proposed actions to the “Transportation System”, we submit:

The Draft EA states that *“the interdisciplinary team identified roads that are creating resource damage or, after implementation of the Snoquera project, would no longer be needed for future management activities of NFS lands within the project area. These roads would be evaluated for treatments to mitigate resource damage while balancing tribal and user access needs.”* The proposed actions fall short in the Green River watershed where according to the aquatics report, treating 0.9 mile would have an incremental effect and not measurable at either of those two sub-watersheds. This same report also noted “The Green-Duwamish and Central Puget Sound Watershed Salmon Habitat Plan (WRIA 9 Watershed Ecosystem Forum 2005) noted as a Tier 1 activity for the upper Green to protect and restore natural sediment recruitment processes by reducing the amount of slides and road-related sediments from forest roads. The Upper Green plays a vital role in habitat connectivity and direct habitat role for wildlife species in the project area. The project documents repeatedly state, *“The Green River was not assessed due to the discontinuous ownership pattern.”* We recognize that the land ownership is checker-boarded in the Upper Green River, but the current condition of that watershed is not sustainable nor meeting the management goals of the national forest in that area. The project documentation *should clearly state* that if the Snoquera project cannot address the land management needs in the Upper Green due to complicated land management patterns (specifically roads with shared ownership/management identified issues), and if so, we ask the Forest Service for commitment to form an all-lands table to address this need in a separate process. This would identify, analyze, and address priority cross boundary land management needs in this area to improve conditions. The Forest Service is identified as a lead in the EPA’s Urban Waters Federal Partnership for the Green-Duwamish, which had a 2013-2014 workplan¹ that included ideas to “Source control in the upper watershed-alternatives to enhance stormwater controls” and “watershed wide riparian restoration”. The Snoquera project analyses clearly define the need in the Upper Green, building on past work such as the Urban Waters Federal Partnership, and therefore puts the Forest Service in a leadership position to initiate and outline a process in coordination with partners such as WRIA-9, EPA, and other landowners to address the transportation system in light of watershed function.

¹ https://www.epa.gov/sites/production/files/2015-08/documents/gd_uwfp_workplan_2013.pdf

The Snoquera Aquatics Report states *“approximately 37.5 miles of apparently unclassified routes in the project area within the White River watershed were mapped using LiDAR, and are not in the official roads database. It is unknown if these routes have already received some level of treatment to address concerns for erosion and flow patterns. Additional routes were seen in the field but not mapped. As other road treatments are occurring in the proximity of these roads, these would be inventoried for treatments to address hydrologic concerns and treated as appropriate.”* The only clear management direction concerning unauthorized roads in the EA states, *“many dispersed camping sites are currently accessed via unauthorized and illegal motorized vehicle routes. These unauthorized motor vehicle routes to dispersed camping sites would be rehabilitated to allow non-motorized access only or would be eliminated. Along with these routes, the dispersed camping sites associated with unauthorized routes would be eliminated, eliminated and replaced, or reduced, based on conditions evaluated on the ground.”* It has been clearly documented through the Greenwater ATM analysis, this project analysis, and field experience that non-system routes (or unauthorized routes) are a problem in the project area that are causing resource damage. The environmental analysis cannot be sound if we recognize the resource risk of these routes, but use vague language that does not determine if these routes will be removed. The Forest Service has analyzed the Snoquera road system through multiple efforts: Sustainable Roads, Greenwater ATM, and this project analysis. Now is the time for the district to authorize a decision for a currently sustainable road system in the Snoquera project area. This needs to include a clear direction that non-system routes are not legal and will not be part of the transportation system for this project area in the future. The Snoquera draft EA states that an alternative or set of actions was considered but not pursued to adopt any non-system roads onto the formal FS system. Therefore, rather than state as the draft EA currently does *“This proposal may include the removal of user-created non-system roads that lack a formal prism or template”* – the final EA and decision should state that **“all non-system roads and motorized trails will be closed** and treated to address resource damage as identified and necessary. Restoration of non-system roads being used as temporary roads during project implementation will be treated after their use is complete.”

As you know, in 2001 the Forest Service put into effect the Roads Rule (referred to as “subpart A”) 66 Fed. Reg. 3206 (Jan. 12, 2001); 36 C.F.R. part 212, subpart A. The Roads Rule created two important obligations for the agency. One obligation is to identify unneeded roads to prioritize for decommissioning or to be considered for other uses. 36 C.F.R. § 212.5(b)(2). This is what the MBSNF accomplished with their 2015 Sustainable Roads Strategy (SRS). Another obligation is to identify the Minimum Road System (MRS) needed for safe and efficient travel and for the protection, management, and use of National Forest system lands. Id. § 212.5(b)(1). The MRS is the road system, determined by the Forest Service, as needed to:

- Meet resource and other management objectives adopted in the relevant land and resource management plan,
- Meet applicable statutory and regulatory requirements,
- Reflect long-term funding expectations, and



- Ensure that the identified system minimizes adverse environmental impacts associated with road construction, reconstruction, decommissioning, and maintenance.

The goal of subpart A is “*to maintain an appropriately sized and environmentally sustainable road system that is responsive to ecological, economic, and social concerns.*” The Forest Service’s Washington Office has issued a series of directive memoranda that outline how the agency expects forests to comply with subpart A. It is not clear from the draft EA what has been determined as the minimum road system for this area. The only reference found is on page 9: “The SRS is the starting point for travel analysis, which includes the site-specific analysis necessary to identify the minimum road system needed for safe and efficient travel and for administration, utilization, and protection of National Forest System lands. See 36 CFR 212.5(b).” (Draft EA, p.9). This reference is important and we understand from talking with your staff about project development that the ID Team did consult the SRS, but this project does not identify a Minimum Road System in an alternative that is ecologically and economically sustainable. The Greenwater ATM was a first step towards this building off of the SRS in a portion of the project area, but this analysis and decision leaves a long ways to go still.

Additionally from discussions with project team staff we understand that there was no new formal Travel Analysis planning documented for the full project area (see attached for reference of what we requested from an ongoing 75,000 acre project on the neighboring OWNF). In order to understand what was done to inform the alternatives from existing analyses and resource staff knowledge we would like to formally request the following information:

- The results from the Sustainable Roads Strategy (SRS) for roads in the Snoquera project area including risks and access needs, be made available as part of this project in an easily digestible format. The SRS analysis spreadsheet simply lists all segments on the MBSNF, and there is no complete list of road segments in the Snoquera project to do a crosswalk with the decision and additional information gleaned from project analyses. The EA indicates the total mileage of aquatics high risk roads in the project area, but not other important information is included such as which segments hold this ‘high risk’ road designation and where they are located in the project area (and how many of them are being addressed with changes)?
- A map of the full project area with all road segments shown in their current and proposed post-project status.

Finally, the project proposes to utilize substantial mileage of temporary roads (34.8 miles) to access stands for treatment, and multiple resource analyses therefore assume a temporary loss to core habitat and increase in the existing road system. As the project is occurring in an already degraded watershed with high road densities, increases in open road densities should occur after and/or in close seasonal coordination with closures and decommissioning to existing system and non-system roads to ensure that the benefits of restoration occur during



implementation rather than only post-project. The Aquatic Conservation Strategy (and subsequent interpretations) recognizes the importance of maintaining and restoring watershed function in the short-term as well as over time, as species are dependent upon conditions in the short term as well as post-project.

Regarding proposed actions for “Watershed Restoration”, we submit:

The Snoquera project has identified that watershed health is a project priority, *“The Project Area is in a Key Watershed yet only partially functioning according to the Watershed Condition Framework. The White River drainage is a Tier 1 Key Watershed that contributes directly to the conservation of at-risk anadromous salmonids, bull trout and resident fish species, and has a high potential for being restored.”* The Snoquera project provides a unique opportunity to provide improved watershed functioning for at-risk aquatic species. The EA identifies excessive road density as a primary contributor to this decreased level of functioning due to *“a road system with major portions within listed fish bearing streams and rivers. The legacy road network and associated infrastructure, constructed in locations that resulted in altered riparian and aquatic processes, are the primary sources impeding water quality and fisheries habitat function in the project area.”* Yet both Alternatives only specify 23.83 miles of the 486.6 miles of system roads for decommissioning and only 11 miles or only 10% of the 150 miles rated as ‘High Risk’ when rated by risk and consequences of road failure to aquatic resources. A low number of miles slated for road decommissioning is a critical area where the project proposal falls short. The EA states that *“a density of greater than 2.4 miles per square mile was used by USDA FS as a threshold indicating a likely impaired watershed function where the probability is high that the hydrologic regime is substantially altered.”* Under the transportation section, the EA discussed the impact of high road densities and states, *“after road treatments have been implemented, the number of catchments with high road densities hopefully has been reduced”*. In a Key Tier 1 Watershed, ‘hopefully’ is not a measureable level of progress. There should be a measurable and certain reduction in road density that will have positive outcomes to improved watershed function and reduction of the loading of fine sediments into nearby streams. The aquatics report stated an apparent increase of *“management related sediments in the Greenwater subwatershed of 409%”* as well as temperatures that exceed thresholds that need to be addressed and have measurable outcomes.

Additionally the Aquatics report states that density is best measured at the subwatershed scale, and two subwatersheds (Headwaters of the White River and Lower West Fork White River) will remain in a ‘likely impaired’ status after project implementation. There is no alternative that brings all subwatersheds into at least an ‘at risk’ and ‘functioning’ status, nor is there an exploration of the trade-offs of what it would take to do so. The anticipated timeline for implementation of this project is 20 years and therefore, there should be an alternative in the EA that indicates what changes would be needed to the existing system and investments to leave these subwatersheds in a functioning state.

The management actions finalized in the Snoquera project not only address the watershed impairments caused in the past and the function of the watershed today, but they will determine the influence of the national forest lands in contributing to the resiliency of the

watershed into a changing future. At the 2016 Puyallup Watershed Science Symposium², it was reported that Puget Sound is expected to experience a 55% reduction in April 1st snowpack by the 2080's, increased winter storm flows, earlier peak run-off, lower summer stream flows, and long low flow periods. The Mount Rainier glaciers have already decreased in area by over 20%, contributing affects to stream temperature and flow. The projected change in bedload transport in the White River is an increase of 48% by the 2040s relative to the current bedload-transport relation, and the risks of a 100-year flood for downstream communities is expected to increase by 37%.

The Snoquera project EA recognizes the science and potential impacts of climate change, but it needs to link the analysis of the proposed action for the watershed to the contribution to mitigating or reducing these future anticipated risks to the whole watershed. Two examples are:

- How the proposed actions can contribute to the national forest lands role in naturally holding water on the landscape in the upper portions of these watersheds in greater quantity and duration for release through the year to reduce flooding, mitigate loss of snowpack, and provide more cool water longer into the year for our streams. The Snoquera analysis states that *"Roads in the Snoquera Project area are increasing the effective drainage network by up to 67.4% and up to 4.19 crossings per mile. After all road treatments have been completed, the modeled drainage network would be increased by up to 60.8% and with no more than 3.11 crossings per mile."* However, multiple catchments will still continue to exceed thresholds. The slight change of under 7% for reducing the effective drainage network of the uplands of two watersheds does not adequately match the impacts we anticipate. A suite of actions should be analyzed and selected that significantly reduce the effective drainage network and increase the natural storage capacity of the upper watershed, showing a long-term positive contribution to a watershed adaptation strategy.
- How the proposed actions contribute to sediment delivery not only today but with future increased bedload movement. The Snoquera EA states that *"reduction of road miles and stabilization of the remaining miles is important for reducing stream channel network extension and sediment delivery. Interception of shallow lateral soil water flow by road cuts and subsequent routing of that water into streams and rivers effectively increases drainage network density, peak flows and sediment delivery."* The aquatics report stated an apparent increase of *"management related sediments in the Greenwater subwatershed of 409%"* in the current condition alone. The road decommissioning, closure (which we assume is full hydrologic closure that will establish some vegetative cover), and stormproofing in the project should demonstrate a substantial decrease in sediment delivery to the watershed in the short-term while also being significant enough to outweigh and mitigate future anticipated impacts. This proposed action does not match the projected increase to sediment bedload in the coming 20 years of almost 48%.

² <https://www.co.pierce.wa.us/DocumentCenter/View/75877/Climate-Change-and-the-Puyallup-Watershed-Binder>

Regarding proposed actions for “Aquatics and Fish Species”, we submit:

The project area is important to the Puget Sound recovery efforts in these watersheds for Puget Sound Chinook Salmon (*Oncorhynchus tshawytscha*), Puget Sound Steelhead Trout (*Oncorhynchus mykiss*) and Bull Trout (*Salvelinus confluentus*), which has been underscored in importance recently due to their importance as a food source for critically endangered Southern Resident Orca Whales. Recognizing the greater emphasis on aquatic restoration in the White River watershed, we note the June 2018 Salmon Habitat Protection and Restoration Strategy for Puyallup and Chambers Watersheds³ states “Preferred projects in upper watershed areas are those that will protect and restore existing intact habitats and natural geomorphic processes and riparian functions; increase fish passage for adult and juvenile salmonids; address sediment load from failing forest roads; and increase large wood inputs.” Additionally, along priority tributaries such as Greenwater River it prioritizes projects which “Protect and maintain natural geomorphic processes and riparian functions where they exist. Protect existing intact habitats and identify new lands and corridors for protection in these high priority areas.” While as stated previously we believe there is a greater need to address sediment delivery, we strongly support the planned improvement to aquatic passageways, tree-tipping to create large woody in-stream structure, and buffers for riparian protections, and riparian corridor restoration (which is also critical for wildlife movement) in the two action alternatives. The EA identifies 150 miles of ‘high risk’ to aquatic resources and fish bearing streams and out of the “12.8 miles of roads determined to be a high risk to aquatic resources that are within 300 feet of streams documented, presumed or potentially used by federally listed fish, these alternatives would treat 1.6 miles (leaving about 11.2 miles of high risk roads remaining).” This should be a high priority for the project to address these road miles and associated issues that will negatively impact federally listed fish species. As discussed above and under the watershed health section, the low number of road miles proposed for decommissioning is an area where the project falls short.

Regarding proposed actions for “Wildlife”, we submit:

We feel that long-term, the landscape level action to create more contiguous blocks of connected habitat, greater diversity in forest structure and enhanced old-growth and late-successional habitat will benefit wildlife species. The EA states “*High road densities are often associated with a reduction of wildlife use or other negative effects on wildlife.*” In the short term, a plan to mitigate disturbances to wildlife associated with terrestrial restoration actions by decommissioning roads no longer needed, on a similar time frame as other roads being built for temporary access. “*Road decommissioning typically resolves potential issues that may impact wildlife. This includes reducing harassment or disturbance to wildlife, poaching, off-road travel, destruction of vegetation associated with dispersed camping, and minimizing intentional or accidental release of petroleum-based or other potential toxins into the soil and water.*” Decommissioning of more than 4.8% of the system roads will go a long way in reducing

³ <https://www.co.pierce.wa.us/ArchiveCenter/ViewFile/Item/6075>



stress, conflicts, and negative effects to wildlife associated with high road density and increased human presence and activities.

Marbled Murrelet

We support that proposed actions associated with Alternative 2 and 3 ‘would not remove, modify or degrade existing suitable habitat for the marbled murrelet’. While *‘Effects Determination for Alternatives 2 and 3: actions may affect and is likely to adversely affect the marbled murrelet’* due to up to approximately 797 acres of suitable nesting habitat would be subject to noise disturbance during the nesting season. *‘This represents approximately 6 percent of the nesting habitat in the project area, which would minimize impacts to the species. Any murrelets nesting in those areas would be subject to adverse effects during the nesting season.’* We recognize that *‘longer term, the proposed habitat restoration activities would accelerate the development of suitable nesting habitat’*, but would like to see more information on how the adverse effects can be mitigated, perhaps more can be proposed to reduce these disturbances to any marbled murrelet in the area. In regard to critical habitat and the protection of primary constituent elements PCE’s like 1) individual trees with potential nesting platforms, we strongly support that trees with these characteristics will be identified by wildlife personnel and not left on site. The Effects Determination states: *may affect, is likely to adversely affect Critical Habitat of the marbled murrelet due to incidental removal of PCE-1 and removal of PCE-2 during thinning and temporary road construction.* Noting the lack of large trees that have these nesting platforms present, due to the age class and size we would support any ‘experimental’ treatments that would encourage the retention of large trees over 20 inch DBH in Matrix and AMA areas and enhance nesting structure and large platforms.

Spotted Owl

We strongly support that “No suitable spotted owl nesting, roosting, or foraging habitat in the project area (approximately 52,916 acres) would be degraded or removed under any alternative”. The forest’s in this project area provide such critical potential to the future maintenance and recovery of spotted owls in providing direct habitat and connectivity between habitats, that it is vital that what exists is protected while active management works to bring more habitat online in a connected fashion quicker. The project does impact 12,245 acres of dispersal habitat over the anticipated 20-year timeline of implementation, and we suggest that the final EA lays out a clear directive on the amount and spatial arrangement of this habitat to disturbed at any one time to be consistent with spotted owl management goals in coordination with consulting agencies.

Grizzly Bear

In the case of restored grizzly bear population, we recognize that elk forage habitats with increased diversity of native grasses, forbs and shrubby vegetation will benefit grizzly bear populations, if we see the return of this species to the area over the coming decades.

Wolf

We support additional road miles being decommissioned or if necessary for future vegetation treatment, placing more roads into storage to benefit wildlife species like deer, elk, and wolves. The EA states *‘Road decommissioning and storage would benefit wolves. Wolves generally favor areas of low road density compared to areas with high road density. However, traffic volume and other human attributes can also be important determinants. Road decommissioning and closure would slightly increase the amount of habitat that is secure from disturbance.’*

Deer and Elk

There has been ample attention paid in the draft EA and project discussions including field trips on the cultural and ecological importance of the North Rainier Elk herd, whose range covers the whole project area including both summer and winter ranges. We support actions to increase the variety of habitats and forage opportunities for this herd across the project area, but feel some important considerations are lacking in the current alternative analyses and implementation of elk forage units to date in the project area. We realize that there are prior legal agreements to uphold on elk forage units in the project area leftover from the Huckleberry Land Exchange, but we offer that there are factors that would benefit elk that can be addressed in this project and in complementary discussions and planning efforts that we are interested in. Additionally, there is a strong recognition in the wildlife report that road densities and locations have a direct influence on elk health and use of habitat but there is a lack of analysis and clearly displayed information to indicate the location and quantity of impact this project’s proposed actions to the transportation system that is creating security patches of habitat for elk or reducing the impact to areas of priority elk winter and summer forage and existing security habitat. We offer:

- Elk certainly benefit from early seral habitat for forage in both summer and winter, but there is a dramatic difference between complex early seral stands and clearcuts. According to a 2012 literature review of early seral forest⁴, “the three primary attributes of ecosystems are composition, structure, and function. Functionality arises from the attributes of composition and structure.” The compositional diversity of the plant community in early seral is key, as is biological legacy structure (down woody debris, standing snags). In visiting the project area this summer and fall, the previously implemented elk forage units are very simplified early seral stands that have tremendous impacts from heavy human use and presence of non-native species. The wildlife report states that *“Snags and down logs would be reduced on the 272 acres of elk forage enhancement openings, due to the initial harvest and maintenance burning.”* We strongly suggest that the Snoquerra project take the opportunity to create high quality complex early seral stands in the elk forage units with clearly identified native seeding and planting plans, prescriptions that maintain biological legacies and site complexity, and therefore benefit not only elk but a suite of other biodiversity in the project area. For example, elk forage habitat could have the potential for increased pollinator plant species. However periodic forage maintenance activities such as prescribed fire,

⁴ http://forestpolicypub.com/wp-content/uploads/2012/06/swanson_20120111.pdf



average open road density for the project area would still remain above the thresholds (for disturbance to deer and elk) after project activities are completed. The analysis has identified the challenge, and the final EA needs to show how the Snoquerra project is functionally improving habitat quality for elk across the project area not only in forage creation but road/trail management.

- Active identified restoration and protection of alpine meadows that provide benefits not only to elk, but a host of other biodiversity. We support the protections of these fragile alpine meadows and recognize potential treatments for the encroachment of conifers may be needed. A management plan to reduce mudding and off-road vehicle access and improve resources for enforcement would also protect these fragile ecosystems and reduce disturbances to wildlife.

Pollinators (bumble bee, butterfly sp.)

Elk forage habitat could have the potential for increased pollinator plant species. *However periodic forage maintenance activities such as prescribed fire, mechanical clearing, or connected invasive plant treatments could have negative effects on the species.*

Regarding proposed actions for “Recreation Opportunities”, we submit:

Our organization supports the balance of responsible recreation on our public lands and the protection of our natural resources from the expanded footprint of recreational use on the landscape. We support the removal of camping sites that are in close proximity to fish bearing streams and therefore negatively impacting and impairing natural stream functions through accelerated bank erosion, denuded vegetation and reduced shade over the stream from trees being cut for firewood. We also support the closure of vehicle access to many dispersed camping sites via removal of unauthorized and illegal motorized vehicle routes and creation of walk-in sites from a designated road system where appropriate, which will provide an opportunity to balance resource degradation with recreational opportunities. We support the proposal for a free designated camping permit that aims to educate the public around leave no trace ethics and minimizing their footprint while promoting responsible recreating on our shared public lands.

We recognize that recreational shooting is a popular use on these national forest lands, but is one that requires better management to ensure that it is sustainable, safe, and offered in balance with the protection and restoration of other natural resources. We support the improvement of two recreational shooting pits to expand parking and adjust shooting lanes by designing earthen mounds within pits, and the closure of the 7013 shooting pit to target shooting. The Forest Service should take these actions quickly, complemented simultaneously by strong education, communication, and enforcement. This decision should also recognize the existence and impact of unauthorized user created shooting pits throughout the project area, and authorize the clean-up and decommissioning of these as discovered and resources allow.



Conclusion

We appreciate the Forest's efforts in creating a plan to improve the overall resiliency of this landscape, in taking steps towards accelerating the complex mosaic of habitats that its native species depend upon for refuge, and the landscape scale approach towards restoration for improved watershed functions.

The Snoquerra Landscape Analysis project represents a unique opportunity to make large improvements to watershed function in the White and Green River watersheds over the coming decades. There is no doubt that there is a definite purpose and need for action in this landscape and we appreciate the analyses and active restoration efforts within the existing alternatives but feel that the "need" for change to meet the desired condition in these landscapes requires increasing treatments to improve watershed function and wildlife security habitat over the existing proposal. We encourage and support the Mount Baker Snoqualmie National Forest to explore what more can be done to further these outcomes.

Sincerely,

 1/4/2019

Laurel Baum
Conservation Associate
lbaum@conservationnw.org

Conservation Northwest
1829 10th Ave W, Suite B
Seattle WA 98119
206.675.9747
www.conservationnw.org

CC:
Jen Watkins, Conservation Northwest
Paul Fischer, Resilient Forestry