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FROM: Snoqualmie Indian Tribe
through Ecology Director, Government Affairs & Special Projects
Cc: GASP Executive Director
DAHP Director
ENR Director

RE: File No. 23- 072701
South Paw Timber Sale #103626, Forest Practice Application #2423544
Impacts on resources of the Snoqualmie Indian Tribe

The Snoqualmie Indian Tribe (Tribe) is a federally recognized sovereign Indian Tribe. We were signatory to the Treaty of Point Elliott of 1855. We reserved certain rights and privileges and ceded certain lands to the United States. As a signatory to the Treaty of Point Elliot, the Tribe specifically reserved, among other things, the right to fish at usual and accustomed areas and the "privilege of hunting and gathering roots and berries on open and unclaimed lands" off-reservation throughout the modern-day state of Washington.

Thank you for the opportunity to review and comment on the South Paw Timber Sale #103626. Based on the information provided and our understanding of the project and its area of potential effects (APE), we recommend thorough archeological and geo-ethnographic reviews be performed for this project. Cultural and archaeological resources are non-renewable and are best discovered prior to ground disturbance. This is in an area the Snoqualmie Tribe considers culturally significant and has a high probability for unknown archaeological deposits and culturally important resources. An inadvertent discovery plan (IDP) should not be used in lieu of archeological investigation. If any archaeological work is performed, the Snoqualmie Tribe must be notified.

The South Paw timber sale #103626 and Forest Practice Application #2423544 should be paused for the same reasons that the Wishbone sale was paused - so that legacy forest areas may be preserved. The South Paw timber harvest would represent the loss of around 30 acres of rare mature lowland forest in King County, the state's most populous county, where we continue to lose forest cover, including mature forests, at an astonishing rate. Preserving mature forests in King County, especially in the Snoqualmie/Snohomish basin, is critical to maintaining ecosystem services and cultural integrity for the Snoqualmie People.



For WA DNR to fulfill the Goals of its own Snohomish Watershed Resilience Action Plan (WRAP), it should preserve the legacy forests in the South Paw sale area. By disregarding the Snohomish WRAP and continuing to cut legacy forests in the Snoqualmie/Snohomish basin, DNR is disregarding the public investment and value of the Snohomish WRAP and treating it as simply a plan on the shelf while conditions on the ground continue to deteriorate. Since legacy forests like those in the South Paw area are disproportionately important for watershed health in the stressed and struggling Snohomish, it is important for DNR to align actions with words in the WRAP by pausing the South Paw sale to allow third-party survey review and the protection of identified critical legacy forest areas. The anticipated protections would still leave ample younger forest available for harvest, if needed.

Preserving older, mature forests in Western Washington, and the Snohomish basin in particular, is important for several ecological, environmental, and societal reasons. While young, even-aged plantation forest stands may have their own benefits, older forests offer unique and critical contributions to the overall health of the ecosystem and the well-being of both human and non-human communities. Here are some reasons why it's important to preserve older, mature forests:

Biodiversity: Older forests typically have a higher level of biodiversity compared to younger stands. These mature ecosystems provide habitat for a wide range of plant and animal species, many of which rely on specific conditions found only in mature forests. Preserving older forests helps conserve rare, threatened, and endangered species that may not be able to thrive in younger stands. Many of these rare species are also vital to the health and well-being of Snoqualmie Tribal members.

Habitat Complexity: The structural complexity of older forests, with diverse tree ages, sizes, and canopy layers, creates a variety of microhabitats that support a wider array of species than younger plantation forests. Species that require specific niches or microclimates often rely on the unique features found in mature forests for their survival.

Water Regulation: Especially key for the water-stressed Snoqualmie and Snohomish Rivers, mature forests play a crucial role in regulating water cycles. Their dense root systems, leaf litter, and thick duff layer help retain and filter water, reducing the risk of flooding, erosion, and water pollution, and sustaining aquifer levels to support late season instream flows. According to research conducted by the Tribe and the US EPA, heavy cutting in Marckworth and the vicinity over the last 2 decades has resulted in significantly lower flows in the Tolt River in late summer and fall, versus what we would have, had DNR and others taken a thinning/forest health approach rather than cutting to maximize revenue at the expense of the watershed and future generations. In fact, our research, in press, shows that flows in the Tolt would have been 20 – 60% higher (50–190 cfs) with a thinning approach versus the management scheme DNR has overseen.



Legacy forests contribute to the overall health of watersheds, which benefits aquatic ecosystems and human communities downstream. DNR has an opportunity to reserve the legacy forests in the South Paw area and shift away from continuing the impacts of mature forest removal to the watershed.

Soil Health: Older forests have well-developed soil ecosystems that support a variety of fungi, bacteria, and other microorganisms. These organisms contribute to nutrient cycling, organic matter decomposition, and the overall health of the soil. Maintaining older forests helps preserve soil fertility and prevent erosion.

Cultural Value: Mature forests often hold cultural significance for indigenous communities such as the Snoqualmie Tribe. Mature forests hosts species important to the Snoqualmie Tribe, that young forests cannot support.

Research and Education: Older forests serve as valuable natural laboratories for ecological research. They provide insights into long-term ecological processes, species interactions, and ecosystem dynamics. Preserving these ecosystems allows for ongoing scientific discovery and environmental education.

Adaptation to Change: Older forests are often more resilient to disturbances such as disease outbreaks, pests, and climate variability due to their diverse structure and composition. Preserving these forests ensures that the ecosystem has a better chance of adapting to future changes.

In summary, preserving older, mature forests in Western Washington is essential for maintaining biodiversity, ecosystem services, carbon, water regulation, soil health, cultural values, research possibilities, and overall ecological resilience. A diverse landscape that includes both young plantations and older forests can contribute to a healthier and more balanced ecosystem for present and future generations—but only if WA DNR will preserve legacy forests such as those in the South Paw area.

Due to the cultural significance of older forests in the area, if DNR proceeds with the South Paw timber sale, the Snoqualmie Tribe must be given notice and an opportunity for more thorough assessment of the sale area for trees and other cultural resources that must be protected for present and future Tribal members.