North Central Washington
Forest Health
Collaborative

February 12, 2021

Jeff Rivera, District Ranger
Okanogan-Wenatchee National Forest
Wenatchee River Ranger District
600 Sherbourne
Leavenworth, WA 98826

Dear District Ranger Rivera,

On behalf of the North Central Washington Forest Health Collaborative (NCWFHC), we are writing to provide comments on the Upper Wenatchee Pilot Project (UWPP) draft Environmental Assessment (EA). We continue to appreciate Wenatchee River Ranger District's (WRRD) collaborative approach to identifying restoration needs across this important restoration project landscape. With UWPP implementation in mind, we look forward to collaborative identification of monitoring and adaptive management opportunities. Individual members of the NCWFHC may also submit more substantive comments from their unique perspectives.

The NCWFHC supports the work the WRRD has conducted to align the UWPP with the Forest Restoration Strategy and commend the integrated approach to aquatic and terrestrial restoration within the project landscape. We appreciate the time and energy that you and your staff took to develop project goals and objectives in partnership with the Collaborative.

The NCWFHC would like to work with the WRRD to develop a more comprehensive monitoring framework for inclusion in the Final EA and to develop a post-decision UWPP monitoring plan. We are committed to exploring resources and partnerships that we can offer to complement the Forest Service's monitoring efforts and capacity. In addition, we look forward to defining shared monitoring goals and priorities to evaluate implementation and management effectiveness at building forest health and resilience.

Aquatics Restoration

We commend the WRRD team for structuring the Aquatics report like a reach assessment. This format was beneficial for presenting the thorough aquatics analysis and linking the aquatic restoration needs to properly functioning condition. The NCWFHC encourages continued use of this approach for aquatics. We note several of the synthesis documents have not been finalized and recommend doing so for the record.

We also recommend including a summary of how Beaver Dam Analogs (BDAs) were considered in this project. Such restoration treatments in riparian areas can promote natural floodplain connections and create wetter riparian conditions that promote wildfire resiliency and reduce spread potential under normal conditions. The NCWFHC remains interested in collaborating with the WRRD to identify aquatic restoration projects that can be implemented more immediately, without affecting other projects such as

planned thinning and Rx burning. We understand some road decommissioning and closures need to occur after these activities to maintain access.

TERRESTRIAL RESTORATION

We acknowledge that condition-based NEPA is intended to cover the range of conditions across a dynamic landscape and over the length of the project; however, we suggest a better description of condition-based NEPA and desired ranges by subwatershed to better tie acreages in the draft EA to landscape restoration needs. An explanation that actual treatment will likely be less than the maximum range due to site-specific conditions would be helpful for public outreach.

Due to broad terrestrial treatment objectives and metrics, differences in "nomenclature" between the Forest Restoration Strategy and the draft EA can be confusing. As a specific example, the Forest Restoration Strategy defines large trees as >20" dbh and very large as >25" dbh. The draft EA language states "…restoration of large (>25-inch-diameter at breast height [DBH]) and old trees applies to all vegetation types and treatments across the planning area." The discrepancy in nomenclature for a "large" tree should be corrected and made consistent with the restoration strategy.

The condition-based approach allows for flexibility, which also makes it hard to evaluate ecological outcomes or benefits. Consequently, the draft EA should include information about the likelihood of treatment or other metrics to better disclose the ecological outcomes/benefits. As the UWPP implements various phases, we recommend detailed information-sharing about specific treatments and acres. We look forward to continued collaboration with the WRRD to monitor lessons learned from each phase of implementation over the life of the project.

Botany

We appreciate the identification of White Bark Pine as an important, non-commercial tree species that requires management action. The focus on meadows, aspen stands, and huckleberry patches is also nice to see, and it may be helpful to talk about unique areas under a separate botany section. More detailed discussion of the botanical resources would be helpful, including information on the USFWS' proposed listing of White Bark Pine, and would better define connections between the condition-based approach and other vegetation management requirements under the Northwest Forest Plan for survey and manage species.

Spotted Owl

The draft EA and alternatives set a maximum number of acres that can be implemented; however, it is hard to understand "why here, why now" with respect to treatments proposed in the LSR, habitat goals, and what the actual treatment range will be. A map depicting different spotted owl habitat conditions would be helpful. In addition, new DNR modeling has identified areas that have the highest potential for maintaining mature multi-storied forests into the future, given climate change predictions and other variables. The NCWFHC would like to work with the WRRD to discuss how to better describe the current and future effects to Spotted Owl habitat and linkages to treatment need. We recommend that monitoring the impacts of treatments on Spotted Owl and its habitat should be a key part of evaluation and adaptive management.

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Roads/Transportation System

We appreciate that the human influence and security habitat was mapped in the draft EA. However, it is unclear to us if and how the species security and wildlife habitat analysis informed the proposed transportation system changes. Thus, we have some concern that more could have been done with road decommissioning. If wildlife and botany resources drove proposed transportation system changes, please state this or describe in the final EA (e.g., how management would affect wildlife connectivity and core, security habitat, and habitat functions over time).

We would like to know whether the WRRD has considered an economic analysis of potential road closures vs. decommissioning or keeping roads open. We understand closed roads can still be used for wildfire access and provide future access for management needs and temporary wildlife security.

Fire Risk Reduction

While we recognize that field conditions will dictate when and where fuel breaks of different sizes will be used, we would appreciate knowing more about how shaded fuel-breaks will complement landscape fire-risk treatments and where stand-alone treatments will occur (i.e., in the WUI where there are limitations). The UWPP Story Map does a good job presenting how the WUI fuel-breaks would interact with treatment alternatives—could this map/information be incorporated or referenced in the draft EA rather remain a stand-alone product? It would be helpful to have detail regarding how fuel-breaks are differentiated from other fire risk treatments, if maintenance needs differ, where they tie into the landscape on a map, and linkages to other implementation tools in the toolbox.

Cross-boundary work is also occurring adjacent to the UWPP project area, as reflected in local Community Wildfire Protection Plans and similar documents such as the Beverly Mackinzie Transmission Line (https://www.fs.usda.gov/project/?project=28094). Recognition of these efforts and planned treatments could be included as part of the overall draft EA analysis and discussion of the cumulative effects of implementation on the landscape.

Moving forward, given new information from HB 1784 and recent DNR landscape evaluation data about shaded fuel-break lines that need validation, we recommend the OWNF consider incorporating this information and continue to adapt to new information and changes on the landscape. We also encourage ongoing collaboration between land management and fire response agencies. Reopening the Camp 12 road egress is a high community priority, and closure of this escape route has created a highly hazardous issue for the Ponderosa housing area. We look forward to continued discussion with the OWNF about how to incorporate this new information and partner on efforts to adaptively manage fire-risk reduction, maintenance, and management needs.

Monitoring and Adaptive Management

We acknowledge that the Monitoring section in the draft EA is a relative placeholder and more work between draft and final will be necessary. A transparent monitoring framework is important for both consultation and to ensure project stakeholders have a common basis for defining “success”. We desire to continue engaging with the WRRD and OWNF regarding how to establish a monitoring process and plan

with clear points to assess where various UWPP treatments occur and when, track implementation decisions made, and evaluate how well the project is progressing to meet the Purpose and Need and maintain all mitigation measures.

We highly encourage collaboration by the WRRD, UWPP participants, and the NCWFHC Projects Work Group members to develop and host a monitoring workshop to bring together members of the OWNF-NCWFHC and community to explore options for joint monitoring efforts over the life of the project. We urge support for and participation in this type of partnership to promote transparency, project reporting, and an assessment of goals, objectives, and accomplishments. We look forward to developing touchpoints for open and frequent communication with the public, Fire Adapted Communities, and partner agencies.

Economics and Implementation

Economic and community benefits from forest restoration are important to the NCWFHC as is the ability to generate resources to ensure implementation of the complete final decision, including both the commercial and non-commercial components. We support utilizing commercial treatments in the project area to address as many of the forest health restoration needs as possible to achieve a blend of ecological, economic, and social goals. Commercial treatments will improve forest health, promote rural economic development, and provide retained receipts that can be invested to implement crucial non-commercial treatments within the UWPP project area, achieve restoration goals, and protect the Wildland Urban Interface areas that have witnessed large fires in recent years.

We urge the WRRD to work with the UWPP Economics Subgroup to develop a process for continued engagement throughout implementation to ensure these benefits are fully realized. We ask that the WRRD consider making helicopter units optional and analyze for tethering or other methods to treat these areas to ensure economic feasibility. Unless helicopter units are coupled with consistently high-volume ground-based units, helicopter logging is not economically feasible on this project.

To the degree possible, we ask that the WRRD and OWNF prioritize application of any retained receipts from commercial sales to help meet the restoration needs of the UWPP area before those of other project areas. We would like to continue dialogue with you and your staff regarding how NCWFHC member resources could help advance UWPP restoration projects that retained receipts may not cover, and we remain committed to keeping the UWPP progressing towards implementation.

Thank you for consideration of our comments to date and within this letter. Watersheds within and adjacent to the UWPP area are a high priority for restoration ecologically, economically, socially, and culturally. We look forward to continued collaboration with you and your staff on project planning, implementation, monitoring and adaptive management.

Sincerely,

Chris Branch, Okanogan County Commission
NCWFHC Co-Chair

Mike Anderson, The Wilderness Society
NCWFHC Co-Chair