

DEPARTMENT OF NATURAL RESOURCES

Forest Resilience Division

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October 18, 2023

Erica Taecker District Ranger Okanogan-Wenatchee National Forest Wenatchee River Ranger District c/o Justin Gleb 600 Sherboume St. Leavenworth, WA 98826 Winthrop, WA 98862

RE: Chumstick to Lower Peshastin Project Scoping Comments

Dear Ranger Taecker,

The Washington State Department of Natural Resources (DNR) would like to thank the Okanogan-Wenatchee National Forest (OWNF) and the Wenatchee River Ranger District for commencing environmental planning activities designed to increase the resilience of the Chumstick to Lower Peshastin Project area. The five watersheds comprising the project area are a priority planning area for the State of Washington's 20-Year Forest Health Strategic Plan: Eastern Washington (20-Year Plan). DNR is Washington's lead for all forest health issues (RCW 76.06.150), with the goal to promote communication and coordination between the state and federal government regarding management decisions that potentially affect the health of Washington's forests. DNR stands ready to continue our work with the US Forest Service to plan forest restoration activities that will improve the resilience of the project area to natural disturbances and climate change. Under our Shared Stewardship MOU with the US Forest Service, we are interested in working to further our common goals in this planning area in an all-lands context from planning through implementation. Our staff are also engaged in this project development through our participation in the North Central Washington Forest Health Collaborative and partnerships with local fire adapted communities.

DNR strongly supports the three identified needs for action for the Chumstick to Lower Peshastin project: 1) reduce elevated risks of wildfire to communities who reside within the wildland urban interface, while increasing opportunities for effective fire suppression across the project area, 2) restore forest structure and composition to more sustainable conditions, and 3) reduce the risk of large-scale habitat loss from severe wildfires. Erica Taecker October 18, 2023 Page 2 of 4

To address Need #1 reduce wildfire risk to communities, Need #2 restore forest structure and composition to more sustainable conditions and Need #3 reduce risk of large-scale habitat loss to severe wildfires, DNR recommends that the OWNF address as much of the vegetation restoration need identified in the landscape evaluation as possible to return conditions to the historical range of variability, to reduce the risk of severe wildfire and other disturbances, and to protect lives, communities, and ecological values. DNR's Landscape Evaluation for the Chumstick to Lower Peshastin project area identifies 36,500 to 53,000 acres in need of treatment across all lands in the project area to increase resilience and reduce wildfire risk.

The Chumstick to Lower Peshastin area contains some of the highest fire risk in all of Washington and Oregon as determined by the US Forest Service Quantitative Wildfire Risk Assessment. Some of the highest burn probabilities in Washington can be found in the project area as well as a variety of values at risk, such as the communities of Leavenworth, Peshastin, Cashmere, Chumstick and Plain, wildlife habitat, aquatic resources, and forest resources. The project area contains a high amount of Wildland Urban Interface (WUI) throughout the project area, which heightens the need for forest health and fuel reduction treatments to reduce wildfire risk to homes and communities.

DNR strongly recommends that shaded fuel breaks be implemented by intersecting large, landscape-level treatment areas with potential control lines as much as possible. Landscape treatments that intersect potential control lines should be the primary shaded fuel break implemented. Limited stand-alone fuel breaks along potential control lines are appropriate when large, landscape-level treatments cannot intersect the control line, and highly valued resources are present, or there is a need to harden a control line for tactical fire reasons. Fuel breaks along property boundaries that do not intersect a control feature or a landscape treatment are of limited utility for wildfire response, forest health or home protection.

Research from across the interior west¹ has shown that mechanical treatments that remove trees are the most effective at reducing density, fuel loads, and crown fire risk, especially when followed by prescribed fire. Non-commercial and fire only treatments can accomplish these goals, but require allocation of limited treatment dollars and often necessitate multiple entries to sufficiently reduce fuels. In addition, goal 3 of the 20-Year Forest Health Strategic Plan

¹ Fulé, P. Z., J. E. Crouse, J. P. Roccaforte, and E. L. Kalies. 2012. Do thinning and/or burning treatments in western USA ponderosa or Jeffrey pine-dominated forests help restore natural fire behavior? Forest Ecology and Management 269:68–81.

Martinson, E. J., and P. N. Omi. 2013. Fuel Treatments and Fire Severity: A Meta-Analysis. USDA Forest Service Rocky Mountain Research Station: Research Paper. RMRS-RP-10.

Stephens, S. L., B. M. Collins, and G. Roller. 2012. Fuel treatment longevity in a Sierra Nevada mixed conifer forest. Forest Ecology and Management 285:204–212.

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recognizes the importance of rural economic development in achieving our broader forest health goals by encouraging forest restoration and management strategies that maintain and attract private sector investments and employment in rural communities. DNR encourages the OWNF to address as many of the forest health treatment needs in the project area as possible through viable commercial treatments in order to achieve ecological, economic, and social goals. Climate change, specifically the projected increase in drought stress that is likely to occur over the next few decades, will continue to add stress to forests in the project area and make them less resilient to natural disturbances such as fire, insects and disease. DNR's landscape evaluation for the project area finds that moisture deficit levels for some of the current moist forest in the project area will shift to dry forest levels from year 2040 to 2070 and some of the current dry forests will shift to non-forest types from year 2040 to 2070 as well. The increase in drought stress over time in the project area is another reason to restore forests in the project area at a large enough scale to be resilient to both the current and future climate. We have identified drought as an important current and future threat to forest health and resiliency, and the proposed actions will make the project area more resilient to a hotter and drier future.

Aquatic restoration activities to improve watershed health and aquatic habitat functions is a clear need in the project area. DNR fully supports addressing both the upland and aquatic restoration needs in this project area as quickly as possible and at the relevant scale and locations needed. We understand aquatic restoration activities are currently being planned and implemented by the US Forest Service, Tribes and other partners in the project using programmatic NEPA tools. We recommend briefly mentioning and summarizing planned aquatic restoration work as you communicate with the public about this project so they understand the US Forest Service is holistically addressing both the aquatic and vegetation restoration needs in the project area.

Since the project intends to use conditions based management, it is important in the draft environmental assessment to help stakeholders understand the scope and scale of likely project implementation while retaining the flexibility inherent in conditional NEPA. This can be a hard needle to thread, but it is helpful to set expectations by identifying in the draft EA what areas are likely to be treated, what areas are open for treatment but have more complexity that limit their treatment potential, and areas that are not going to be treated. Classifying potential treatment units into these broad categories can help set expectations and help stakeholders understand likely project outcomes as opposed to just setting a maximum treatment acreage. Also estimating what percentage of potential treatments will be not be treated due to access limitations (e.g., steep slopes, roadless areas), resource protection measures (e.g., riparian buffers, unstable slopes, protected resources), or other site-specific conditions would be helpful information to share in the draft EA.

DNR SE Region State Lands unit manage land in the project area. Please let us know if additional early coordination on access or landscape scale planning is beneficial.

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Finally, monitoring at the stand and landscape scale is a critical component of DNR's 20-Year Forest Health Strategic Plan. We would like to see specific direction included in the decision for a monitoring plan for this project, which we hope will integrate well with our efforts. DNR thanks your team and the OWNF 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 eastern Cascades.

Sincerely,

George Geissler State Forester and Deputy Supervisor, Wildland Fire Management Washington State Department of Natural Resources

c: Chuck Hersey Amy Ramsey