

Okanogan-Wenatchee National Forest
Wenatchee River Ranger District
c/o Justin Gelb
600 Sherbourne Street
Leavenworth, WA 98826

October 23, 2023

Dear Mr. Gelb,

Thank you for the opportunity to comment on the Chumstick to Lower Peshastin (LP) project. The North Central Washington Forest Health Collaborative (NCWFHC) appreciates the Wenatchee River Ranger District's (WRRD) engagement on this project and in our various meetings and field trips. Since project initiation, NCWFHC has been engaged with the WRRD in support of this project, including sending a collaborative engagement letter and a collaborative engagement agreement document in April of 2021. Our engagement is ongoing, and we look forward to continuing our engagement with you and your staff through the remainder of the planning phase, as well as the implementation and monitoring phase. NCWFHC members are deeply interested in supporting the Okanogan-Wenatchee Forest Restoration Strategy, increasing the pace and scale of comprehensive restoration projects, and bringing innovation and comprehensive solutions to the problems that face our forest today. Our comments reflect this interest.

We support the overall purpose of this project to 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.. However, we have concerns with elements of the proposed action including the lack of aquatic and road-related components; the desire for some site-specific analysis; priority wildlife habitat considerations; cross-boundary treatment opportunities; shared stewardship with the Washington Department of Natural Resources (WA DNR); and private landowner partnership and outreach.

We support the project needs based upon the WA DNR landscape evaluation, field reconnaissance, and local knowledge to conduct thinning (commercial and non-commercial treatments) and prescribed fire treatments to reduce hazardous fuels, reduce fire risks, restore forest conditions, and address departures from historic and predicted future conditions. We also support the primary focus being placed within the Wildland Urban Interface (WUI) while also restoring areas outside the WUI to prevent wildfire from threatening private property.

Regarding the proposed action, we ask for the WRRD to clarify whether or not treatments would extend into riparian reserves. If so, would treatment prescriptions vary in riparian reserves compared to upland treatments?

Aquatic Components and Road Management

We understand the WRRD was directed to use the Western Fireheds Emergency Action Declaration (EAD) (Bipartisan Infrastructure Law, Section 40807) on the Chumstick to LP and this may limit the proposed action to those authorized emergency actions under the EAD. However, we would like to understand how aquatic restoration actions in the planning area will be analyzed and when they will be

implemented. For instance, will the WRRD be utilizing the Region's Aquatic Restoration Environmental Assessment and Aquatic Restoration Biological Opinion (ARBO)? We also ask what funding mechanism the District plans to use to implement aquatic restoration actions and share a concern about the majority of funding coming to the Forest being tied to terrestrial actions. In addition, aquatic restoration funding, such as those for salmon recovery, would be difficult for partners to attain in this planning area.

We request that any retained receipts (stewardship sales) or program revenue (Good Neighbor Authority) be reserved for use on the Chumstick to LP planning area specifically for implementing aquatics and road management needs in the planning area, in tandem with the project's proposed actions.

We strongly encourage the WRRD to implement aquatic restoration activities in tandem with those in the proposed action, as these are also a high priority within this planning area. For example, we have a concern about extending the life of failed culverts and increasing potential for related road failures if aquatic activities are not implemented at the same time as the proposed actions. Upgrading and replacing planning area culverts at the same time equipment is there doing the haul route road maintenance and harvest activities will result in large cost savings. We also want to stress the importance of ensuring appropriate water crossing structures for wildland fire fighting access. Additionally, ensuring roads within the planning area are in good repair (including right-sizing and replacing old and failing culverts) will ensure those roads are available for fire suppression access, as well as safe ingress and egress, which will bolster the WRRD's ability to meet stated project purposes. Equally, we are concerned that if instream habitat restoration needs are not addressed through the proposed action, they will not be addressed at all.

With the high density of roads within the planning area, it is a lost opportunity to not analyze road decommissioning as part of the proposed action. We maintain the same concerns above with not implementing these types of activities while equipment is implementing the proposed action.

Condition Based Management (CBM)

The NCWFHC has previously expressed appreciation of the Okanogan-Wenatchee National Forest's approach to using site-specific treatments where more controversial treatments are used, including, for instance, late-successional reserves (LSR), riparian reserves, and fuel break maintenance/development. While collaborative members are supportive of strategically located fuel breaks in appropriate areas, we encourage the WRRD to analyze fuel breaks using a site-specific approach instead of CBM. Additionally, we suggest developing some site-specific parameters around Priority Wildlife Habitat (i.e., white headed woodpecker, northern goshawk, flammulated owl, fishers, mule deer winter and breeding, and northern spotted owl (NSO)) within the planning area. We also suggest that wildlife biologists review the project area in tandem with treatment boundary development, partnering with other resource specialists to improve habitat and sites for locally important species within project designs.

There are differing views among collaborative members about the appropriate prescriptions and strategic locations of fuel breaks and LSR or NSO habitat treatments. Therefore, collaborative members will comment individually on their concerns and interests. Because these topics are highly sensitive and of interest to collaborative members, we ask for clear, direct, and frequent communication on this topic.

Stand-level Variability

We encourage the WRRD to ensure that the project includes stand-level heterogeneity both during implementation and as part of the proposed action. Purpose #2 could be amended to include creating *diversity* in composition and structure, as well as restoring them to more sustainable conditions related to wildfire risk.

Cross-Boundary Treatment Opportunities and Shared Stewardship

The NCWFHC encourages the WRRD to pursue a close partnership with the WA DNR to assess potential cross-boundary treatment opportunities both on state lands and on private lands within the planning area. We recognize and appreciate the shared stewardship approach already undertaken to identify resource conditions and needs through the landscape evaluation. We encourage the WRRD to further the project's shared stewardship through coordinated investments and implementation, as outlined in the "Shared Stewardship" Memorandum of Understanding¹.

Private Landowner Partnership and Outreach

With the high proportion of wildland-urban interface (WUI) within the planning area, we offer our network of collaborative partners to increase opportunities for private landowner partnership and outreach. We appreciate the WRRD's use of the Chumstick Wildfire Stewardship Coalition's strong community engagement and knowledge in planned community meetings. The NCWFHC asks the WRRD to consider utilizing other collaborative partner networks with communities within the planning area, such as Cascadia Conservation District and Chelan County Natural Resources, and WA DNR. We request that the WRRD work with local collaborative partners to assess the potential for alternative project area access. For example, make use of the WA DNR Good Neighbor Authority to enhance access using WA DNR temporary right-of-ways. This may increase operability within the project area, help ensure analyzed treatments get implemented, and strengthen the opportunity for cross-boundary treatments on land ownerships outside of the Forest.

Contracted NEPA

The NCWFHC supports contracted NEPA as an innovative solution to increase capacity, however, we encourage the WRRD to apply lessons learned from issues experienced in previous NEPA contracts. Based on our collective learned experience on the Upper Wenatchee Pilot Project (UWPP), we ask the WRRD to thoughtfully consider the following lessons learned for third-party NEPA contracting, including:

- Developing more efficiencies in communications between FS staff and NEPA contractors
- Developing specific metrics to evaluate performance of NEPA contractors.
- Making adjustments or changes quickly if contractors are not meeting goals; and
- Providing training for FS staff working with NEPA contractors, stewardship authorities and latest tools.

¹ "Shared Stewardship" Memorandum of Understanding (MOU) between the WA DNR, WA Department of Fish and Wildlife and US Forest Service https://www.dnr.wa.gov/publications/em_nr_mou_051019.pdf?t0zhzbt

We also suggest clearly outlining the Forest's expectations and measures of success early in the NEPA process, developing a robust assessment tool for quality contract compliance, and clearly identifying key touchpoints for the Forest's shadow interdisciplinary team with the contracted team.

Economic Considerations

The NCWFHC is familiar with the Chumstick to LP landscape and understands treatments in steep terrain within the planning area are unavoidable. For instance, we could encourage an analysis that allows for the choice of cable or tethered systems. For economic reasons, we discourage helicopter logging. End product markets will generally not cover the cost of helicopter logging; therefore other units in the planning area will need to make up the cost impact for use of this system. If helicopter logging is unavoidable, consider using Central Washington Initiative funding to subsidize the cost of treatments within those units.

Monitoring

We encourage the WRRD to work with the NCWFHC, the Chumstick Wildfire Coalition, the WA DNR, and others to develop a comprehensive monitoring plan for Chumstick to LP landscape using the Upper Wenatchee Pilot Project monitoring plan as a template. We are specifically interested in effectiveness monitoring to ensure project actions produce the intended outcome.

Thank you for the opportunity to comment. We look forward to engaging with the WRRD as outlined in the collaborative engagement agreement before the release of the Draft EA to ensure the complexities of the proposed actions are well understood.

Sincerely,



Chris Branch/Okanogan County
NCWFHC Co-Chair



Tiana Luke/The Wilderness Society
Interim NCWFHC Co-Chair

Chum to LP PWG Comments 2023.10.22

Final Audit Report

2023-10-23

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