

October 24, 2023

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

Dear Mr. Gelb,

On behalf of The Wilderness Society (TWS), we thank you for the opportunity to comment on the Chumstick to Lower Peshastin (LP) Project scoping letter. TWS is a national non-profit environmental organization dedicated to uniting people to protect wild places. As you know, we actively participate in the North Central Washington Forest Health Collaboration (NCWFHC) and have been involved in restoration projects in the Wenatchee River Ranger District (WRRD), including the Upper Wenatchee Pilot Project. In addition to submitting these comments, we wholeheartedly endorse the detailed comments submitted by the NCWFHC.

For several reasons, TWS is interested in the Chumstick to LP project planning area. First, it is a significant part of the North Cascades ecoregion, which TWS has selected as a national priority landscape. Second, it contains old-growth forests. Third, the Northwest Forest Plan governs the area's management, and the area includes Late Successional Reserve. Finally, the project provides an opportunity to advance the goal of the NCWFHC to increase ecologically sustainable timber harvests, implement the Forest Restoration Strategy, and improve and restore more healthy and resilient forests and watersheds.

#### Purpose and Need

We are supportive of all four purpose and needs for the project including 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 wildfire.

We encourage the WRRD to focus on purpose and need number 2. And in doing so, to focus on how the structure and composition impact the ecological function of the forest.

## Mature and Old Forests

#### Executive Order on Forests

President Biden highlighted the importance of mature and old-growth forests by signing Executive Order 14072 in Seattle on Earth Day 2022. Noting the irreplaceable role that forests play in absorbing and storing carbon dioxide emitted by human activities, the E.O. states, "Conserving old-growth and mature forests on Federal lands while supporting and advancing climate-smart forestry and sustainable forest products is critical to protecting these and other ecosystem services provided by these forests." Furthermore, the E.O. states:

It is the policy of my Administration, in consultation with State, local, Tribal, and territorial governments, as well as the private sector, nonprofit organizations, labor unions, and the scientific community, to pursue science-based, sustainable forest and land management; conserve America's mature and old-growth forests on Federal lands; invest in forest health and restoration; support indigenous traditional ecological knowledge and cultural and subsistence practices; honor Tribal treaty rights; and deploy climate-smart forestry practices and other nature-based solutions to improve the resilience of our lands, waters, wildlife, and communities in the face of increasing disturbances and chronic stress arising from climate impacts. It is also the policy of my Administration, as outlined in *Conserving and Restoring America the Beautiful*, to support collaborative, locally led conservation solutions.

We encourage you to apply this policy direction in E.O. 14072 to the Chumstick to LP Project.

## Stand-level Variability

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

## Aquatic Restoration & Roads

We understand this project will be under the Western Fishery Emergency Action Declaration (EAD) (Bipartisan Infrastructure Law, Section 40807). We are deeply concerned about what this means for aquatic restoration and road mileage management within the project area. How will you ensure that this important work is completed promptly? We have seen the value of holistic restoration projects that integrate terrestrial and aquatic across the region. Joint terrestrial and aquatic restoration have been the backbone that allows for the support of many key stakeholders and governments to do this work. We are concerned that not ensuring the completion of aquatic and road management actions will jeopardize the necessary terrestrial restoration actions. We strongly encourage immediately starting a plan for aquatic restoration and a minimum road analysis in tandem with this terrestrial restoration-centered project.

For example, we are concerned about extending the life of failed culverts and increasing the potential for related road failures if aquatic activities are not implemented simultaneously as the proposed actions. Upgrading and replacing planning area culverts while equipment does haul route road maintenance and harvest activities will result in considerable 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.

With the high density of roads within the planning area, it is a lost opportunity not to analyze road decommissioning as part of the proposed action.

## Climate Change and Future Range of Variability

The landscape evaluation conducted for the Chumstick to LP project area highlights the importance of ecological restoration actions to promote climate adaptation and increase resilience to the projected future climatic changes we will see in the region. The moisture deficit levels for the Chumstick to LP project area are incredibly stark. We support taking action to promote the resilience of old and mature trees and increase stand-level variability.

## Strategic Fuel Breaks

We can support strategic fuel breaks when they are part of a landscape-scale ecological restoration project and based on a scientifically based landscape evaluation. We encourage the WRRD to include a detailed rationale for proposing a strategic fuel break, including why the location is strategic. We also encourage the WRRD to consider the effects of these fuel breaks on wildlife and landscape connectivity, especially wildlife that may use higher-elevation ridgetops. We suggest a focus on landscape-scale restoration that includes addressing spatial pattern to mimic the historic and future range of variability.

## Condition-Based Management

We are concerned about using condition-based management (CBM) for this project. We encourage using site-specific treatments where more controversial treatments are used, including, for instance, late-successional reserves (LSR), riparian reserves, and strategic fuel break maintenance/development. CBM may allow for more flexibility, but we have not seen examples of CBM speeding up the process of moving from planning to implementing projects. We are concerned that when using CBM, shared expectations and understanding of the project, once implemented, will be nearly impossible to achieve. It could also result in more degraded trust within the community, jeopardizing future necessary ecological forest restoration treatments within the district.

## 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. The Wilderness Society is committed to this work, and we encourage you to reach out to discuss monitoring during the planning process.

Once again, thank you for considering TWS's comments. We look forward to collaborating with the WRRD through planning and implementing this project.

Sincerely,

A handwritten signature in dark ink, appearing to be a stylized 'A' followed by a flourish.

Tiana Luke  
Eastern North Cascades Conservation Manager  
The Wilderness Society