DEPARTMENT OF NATURAL RESOURCES

OFFICE OF THE COMMISSIONER OF PUBLIC LANDS
1111 WASHINGTON ST SE
MS 47001
OLYMPIA, WA 98504-7001

360-902-1000
WWW.DNR.WA.GOV

January 29, 2021

Jeffrey A. Rivera
District Ranger
Okanogan-Wenatchee National Forest
Wenatchee River Ranger District
600 Shelburne Street
Leavenworth, WA 98826

RE: Upper Wenatchee Pilot Project Draft Environmental Assessment

Dear Mr. Rivera,

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 a draft environmental assessment of restoration activities designed to increase resilience of the Upper Wenatchee Pilot Project area. The four 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. We stand ready to continue our work with the US Forest Service (USFS) to plan and implement forest restoration activities that improve resilience to natural disturbances and climate change.

Under our Shared Stewardship Memorandum of Understanding with USFS, we are interested in working to further our common goals in the Upper Wenatchee Pilot Project area in an all-lands context from planning through implementation. Our agency's staff engaged in this project's development through participation in the North Central Washington Forest Health Collaborative (NCWFHC), leadership roles in the Upper Wenatchee Pilot Project team, and partnerships with local fire-adapted communities. We submit this letter in complement to the NCWFHC comment letter to suggest greater clarification and/or improvement in the final environmental analysis and considerations for successful implementation of the final Record of Decision.

We strongly support the scope and scale of proposed potential restoration activities in the draft EA as the current condition based proposal includes the opportunity to meet the scale of forest health treatment need identified in DNR's landscape evaluation. In 2018, DNR conducted an

assessment of forest health treatment need across all-lands in the Upper Wenatchee priority planning area as required by the Forest Health Assessment and Treatment Framework (RCW 76.06.200). This assessment identifies 15,500 to 27,000 acres needing treatment, such as commercial thinning, non-commercial thinning, and prescribed fire to improve forest health and create a resilient landscape. The vast majority of recommended treatments are on US Forest Service land, as approximately 85% of the analysis area is National Forest. Last year we worked with staff from the Wenatchee River Ranger District and the local community to update our assessment by integrating landscape treatment and wildfire response benefit prioritizations via identification of areas that offer dual-benefits to forest health and wildfire response. These assessments are attached and can inform continued project development.

The Upper Wenatchee Pilot Project 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 communities, wildlife habitat, aquatic resources, and forest resources. Additionally, ongoing climate change, specifically projected increase in drought stress likely to occur over the next few decades, will continue to add stress to area forests and make them less resilient to natural disturbances such as fire, insects, and disease. Moisture deficit levels for much of the project area from 2040 to 2070 are projected to be at levels currently associated with dry forests and non-forest types, as found in DNR's landscape evaluation for the project area. The increase in drought stress over time is another reason to restore forests at a large enough scale to be resilient to current and future climate.

DNR recommends that the OWNF address as much of the vegetation restoration need identified in the landscape evaluation as possible within the Upper Wenatchee Pilot Project 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 while being consistent with other plans and regulations covering the project area.

The draft EA recognizes the impacts of drought on existing forest health and fuel loads, as well the relationship of periods of drought and climate to the size and severity of wildfires. We suggest the final EA not only identify the risk that drought has on desired conditions for the project area but also where and how proposed actions will mitigate drought, see attached document. The final EA should also emphasize the integration and co-benefits of aquatic and terrestrial proposed actions, including wildfire risk benefits associated with specific aquatic restoration and drought mitigation actions.

DNR supports the proposed aquatic restoration activities contained in the draft EA and incorporation of existing data, watershed conditions reports, and aquatic landscape evaluation into the analysis and proposed actions. As your team finalizes the EA, please keep in mind the importance of maintaining sustainable access for recreation, forest management, and emergency management consistent with maintaining healthy watersheds and aquatic habitats.

We provide the following considerations to address following our review of the draft EA:

- Establish clear expectations for the scale of implementation within the conditional NEPA framework by stating the range and priority of treatments needed to meet the Purpose and Need. The current alternatives set a maximum number of acres that may have specific forest health treatments applied to them based on a set of conditions, while the draft EA recognizes "*it is expected that actual acres treated would be less 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*." Timber volume estimates were adjusted from maximum values based on field investigations and professional judgment. Those resources, in addition to landscape evaluations, can inform refined treatment acreage targets in the final EA that do not limit implementation options but do clarify our common understanding of implementation necessary to meet the identified needs for this project, including risk reduction to values and forest restoration.

- Identify the decision making process and documentation for project implementation, including both areas identified in NEPA that will not be treated for reasons indicated above, as well as where the draft EA indicates "*limited treatments could occur outside of the mapped treatment areas presented in this analysis….While the extent of this activity is unknown, it would be small in comparison to the planned activities.*"

- Conditional NEPA provides flexibility, but more information on prioritization and sequencing of treatments in the final EA is recommended.

- Reference and address consistency and reasons for differences with proposed shaded fuel breaks in the draft EA with the Potential Control Lines for this project area that we collaboratively identified as options in DNR's 2020 update to the Upper Wenatchee Landscape Evaluation. One example is in the southern tip of the Beaver Creek watershed, is there a potential control line in that area that could benefit from fuel reduction treatments to make the line effective for firefighting operations?

- Provide additional, conditional language to guide prescriptions and prioritization of shaded fuel breaks and wildland-urban interface fuel breaks. We support the clear identification of these treatments where appropriate to reduce risk and aid in wildfire management and response. Still, we recommend analysis connect existing resources (such as the Lake Wenatchee Fire Districts Home Assessment), control features, accessibility, and adjacency to landscape treatment units with conditional NEPA language to inform implementation. Additional description of general guidelines that will guide fuel break placement and prescriptions would be beneficial to include in the final EA. Contemporary research[1] is

[1] Agee, J.K., B. Bahro, M.A. Finney, P.N. Omi, D.B. Sapsis, C.N. Skinner, J.W. Wagtendonk, C.P. Weatherspoon. 2000. The use of shaded fuelbreaks in landscape fire management. Forest Ecology and Management 127:55-66.
Merriam, K. E., J. E. Keeley, and J. L. Beyers. 2006. Fuel breaks affect nonnative species abundance in Californian plant communities. Ecological Applications 16:515-527.
Syphard, A. D., J. E. Keeley, and T. J. Brennan. 2011a. Comparing the role of fuel breaks across southern California national forests. Forest Ecology and Management 261:2038-2048.
Syphard, A. D., J. E. Keeley, and T. J. Brennan. 2011b. Factors affecting fuel break effectiveness in the control of large fires on the Los Padres National Forest, California. International Journal of Wildland Fire 20:764-775.

available to guide development of fuel break guidelines and prescriptions and also communicate their use and limitations.

The EA states that the "*fuel break footprint would generally overlap existing or planned treatment areas and would be integrated with silvicultural treatments to achieve desired stand conditions*." DNR strongly supports that both shaded fuel breaks and wildland-urban interface fuel breaks be implemented by intersecting large, landscape-level treatment areas with potential control lines and private property boundaries as much as possible. 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.

- Document the assumptions and fire modeling tools used to conduct the fire risk analysis in the final EA.

- Increase use of viable commercial treatments to achieve forest health treatment objectives. The forest health treatments identified through the landscape evaluation process include a variety of treatments such as commercial thinning, non-commercial thinning, prescribed burning, fuel treatments, and regeneration harvests. Based on results of the landscape evaluation, the majority of acres identified for treatment are potentially viable for commercial treatments that will both improve forest health as well as promote rural economic development and provide receipts that can be invested in non-commercial restoration work in the project area. Research from across the interior west[2] 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 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. We encourage the OWNF to address as many forest health treatment needs as possible through viable commercial treatments to achieve ecological, economic, and social goals. As we have seen on other recent USFS projects, the economic condition of many stands in the area is marginal and individual project design decisions can be the tipping point between treatments getting completed

[2] 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. (2) 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.

versus waiting years in a very high fire risk area. The EA confirms the No Action alternative is not an option for moving this landscape into a more resilient condition, and therefore the final proposed action needs to meet the need for restoration while balancing efficient and effective implementation of treatments that can generate economic by-products and protect resources.

- Expand analysis on risk reduction treatment benefits and habitat impacts in the late-successional reserve (LSR). The draft EA states, "*implementation of the Action Alternatives would not significantly reduce the fire risk in forests contained with the LSR/MLSA….but would have a substantial reduction in fire risk in areas that are currently defined (prior to the implementation of treatments) as NRF habitats*." Specific to the LSR habitat in the eastern and northeastern portion of the project area, the USFS could consider additional analysis to ensure that location, scale, and intensity of treatment prescriptions implemented within the LSR are effective in reducing risk to spotted owl habitat (within and outside the LSR) as well as nearby homes.

- Include a map of spotted owl habitat in the final EA to accompany Table 2.2-2. Due to extensive effort your agency and the collaborative have put into mapping different habitat types, and highest priority habitat areas for spotted owls in the project area, a map that displays these habitats would be helpful.

Finally we encourage that the final EA include a comprehensive implementation and effectiveness monitoring plan, including tracking the staging and implementation of forest management prescriptions in spotted owl habitat and impacts on habitat fragmentation and patch size. DNR is committed to monitoring progress towards our shared goals for forest health, including tracking treatment implementation, post-implementation condition, and change in conditions and risk to values. Our staff can contribute to developing a monitoring plan and identifying where our Monitoring Framework for the 20-Year Forest Health Strategic Plan: Eastern Washington can be integrated.

We thank your team and the OWNF for its leadership in 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,

DocuSigned by:
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George Geissler
State Forester| Deputy, Wildland Fire and Forest Health/Resiliency