North Central Washington Forest Health Collaborative

June 14, 2021

Kari Grover-Wier, District Ranger
Chelan-Entiat Ranger District
Okanogan-Wenatchee National Forest
via email to: kari.grover-wier@usda.gov

Dear District Ranger Grover-Wier,

Thank you for requesting input from the North Central Washington Forest Health Collaborative (NCWFHC) on the Entiat Ranger District's proposed action for the 65,000-acre Mad Roaring Mills (MRM) Landscape Restoration Project. The Forest Service's development of this comprehensive restoration project is consistent with our collaborative, science-based approach to increasing the pace and scale of restoration actions on the Okanogan-Wenatchee National Forest (OWNF).

Information in Terrestrial and Aquatic Evaluations

We appreciate the information that the Forest Service has provided about the MRM project to date, including the May 13 scoping notice, the accompanying story map, and the presentation by District staff at the May 25 public open house. As discussed below, in developing the environmental assessment for this project, we encourage the Forest Service to give careful attention to recent evaluations of the MRM landscape undertaken by the Washington Department of Natural Resources (DNR) and Yakama Nation.

First, the Washington DNR has conducted a terrestrial evaluation of the same MRM landscape, which DNR has identified as a priority planning area under its 20-year forest health strategy.[1] Highlights of the DNR's evaluation – which apply to all land ownerships in the MRM landscape – include the following:

- The MRM planning area includes three sub-watersheds within the Entiat River drainage (Mad River, Roaring Creek, Mills Creek).
- The area is 63% US Forest Service, 14% private, 8% industrial forestland, and 15% other landowners.
- Fire risk is highest in western portions of the planning area, particularly on the upper slopes northeast of Entiat Ridge.
- Projected warming over the next 20-40 years will likely shift climate conditions suitable for moist and cold forest towards conditions suitable for dry forest. Low elevations and south-facing slopes may no longer support forest.
- Treating 41-60% of forested acres is recommended to increase resilience and reduce fire risk to communities using a combination of mechanical, prescribe fire, and managed wildfire treatments.
- Treatment priority is high in western and eastern portions of the planning area based on fire risk, drought vulnerability, current forest structure, and fire transmission to communities.

[1] https://deptofnaturalresources.app.box.com/s/ejg0hx8l9n6uj5bfeocwd9km0qwme4eg/file/748726469727.

Second, the Yakama Nation has completed a reach assessment and restoration strategy for the Lower Mad River within the project area.[2] According to the assessment, the Lower Mad River provides important spawning and rearing habitat for endangered Upper Columbia spring Chinook salmon and Upper Columbia steelhead, while the Mad River is considered a stronghold for threatened bull trout. However, in-stream habitat conditions are seriously degraded and in need of restoration actions, including the following (which, again, apply to all ownerships within the reach):

- Restoring native riparian vegetation to reestablish natural stream stability, stream shading, nutrient exchange, and large wood recruitment.
- Removing unnatural materials such as a collapsed concrete bridge wall.
- Enhancing channel complexity by actions such as creating side channels.
- Improving habitat quality by placement of habitat structures such as large wood, log jams, and/or boulders.
- Creating off-channel habitat to provide rearing habitat and refugia areas.

Aquatic Restoration Actions

Regional context: Regionally, aquatic habitat restoration efforts aim to restore natural watershed function and address ecological concerns within a watershed context with the long-term goal of recovering ESA-listed salmon, steelhead, and bull trout. We encourage the Forest Service to use this recovery framework when evaluating watershed condition and actions to address impairments. Specifically, we encourage consideration of the following:

- ESA-listed fish distribution, abundance, and productivity within the three subwatersheds where the project is located and within their larger watershed context.
- Ecological concerns (limiting factors) affecting watershed health and function. Consideration of all issues contributing to watershed impairment, even those outside of the scope of this project, help to provide a framework for potential future efforts. For this project, all actions to address instream flow, temperature, riparian condition, floodplain and channel function, fine sediment, and anthropogenic barriers should be considered.
- Predicted climate change impacts on stream flow and temperature. Opportunities to mitigate for the predicted changes including actions to address stream temperature, instream flow, and water storage are important to consider in this context.

Watershed context: Outlining a comprehensive list of factors contributing to watershed impairment allows for a holistic look at aquatic condition and serves as a framework for restoration. We encourage the Forest Service to provide this context as part of the proposal and to describe what elements the MRM Project will, and will not, address and why. Those actions that will not be addressed in the MRM Project should be addressed through future partnership and collaboration efforts in order to fully meet the goals of the OWNF Restoration Strategy and the NCWFHC. Specifically, we encourage consideration of the following watershed conditions and appropriate restoration actions:

- Instream flow: Discussion of all potential drivers, including grazing and water diversions, water storage, large wood recruitment and retention, floodplain connectivity, and channel function. Consideration of multiple restoration techniques including wood-assisted and post-assisted beaver

[2] https://dashboard.yakamafish-star.net/sites/default/files/2020-03/LowerMadRiverRA_2018.pdf?current=/DataQuery/Reports.

dam analogs (BDA) or other instream wood addition, beaver reintroduction based on existing models such as the Beaver Restoration Assessment Tool (BRAT), and decreasing or eliminating diversions.
- Stream Temperature: Discussion of all potential drivers, including riparian condition as well as the drivers for instream flow listed above. Restoration techniques include those listed for improving instream flow as well as riparian buffer restoration.
- Riparian condition: Identification of areas where riparian forest is not functional and use of low-impact restoration techniques to restore function. Management objectives should include fire resiliency, improving and protecting large trees, and increasing shade, floodplain connection, sediment retention, and beaver habitat.
- Floodplain and Channel Function: Identification of all areas with reduced floodplain and channel function and consideration of all potential restoration tools including those listed for addressing habitat quality, instream flow, temperature, and riparian condition, and fine sediment.
- Fine Sediment: Identification of all roads and culverts potentially contributing fine sediment to the stream network. We strongly support the proposed road decommissioning and culvert improvements and encourage actions that maximize the amount of decommissioning and road management to reduce road-stream interactions and fish barriers.
- Anthropogenic Barriers: Identification of all partial or complete fish passage barriers and actions to address them.

Upland Restoration Actions

We agree there is a need to restore ecological conditions and fire regimes within the MRM landscape. This is an excellent opportunity to use the OWNF Forest Restoration Strategy (both aquatic and terrestrial) to manage at the landscape scale.

The DNR's assessment of the MRM landscape identified terrestrial treatment goals of 13,500-20,000 acres, or 20-30 percent of the landscape across all ownerships. The Forest Service's proposed action proposes to treat a total of 10,762 acres, or 26 percent of the 41,000 acres of OWNF land in the MRM landscape. In the environmental assessment, it would be helpful to provide information about other restoration treatments planned or accomplished by the Forest Service and other landowners in the MRM landscape.

In comparing the maps of the proposed treatment and the high priority areas (based on fire risk) identified by the DNR's evaluation, there appears to be good overlap overall. However, some locations proposed for treatment do not appear to align well with the DNR assessment -- specifically, the area east and southeast of Pine Flats Campground. We would appreciate some clarification on the rationale for treating those areas.

In addition, several proposed treatment units overlap with areas identified by DNR as having the highest potential for sustaining large dense forest – i.e., areas with the lowest anticipated moisture stress. Thinning now to grow bigger trees faster in these more productive areas seems appropriate, provided that the long-term prescription also includes allowing in-growth to occur and potentially forgoing the periodic maintenance burns/treatments that are common in the dry forest.

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Finally, the DNR assessment identifies a sizable drop in the amount of small dense forest in the moist cold forest type. While this may be warranted based on landscape metrics, some caution is needed when dealing with lynx habitat given the loss of so much high-quality lynx habitat due to recent wildfires.

Going forward, the NCWFHC looks forward to working with the Forest Service as you complete the MRM project planning and begin implementation. The NCWFHC is committed to finding efficient and productive ways to engage with the OWNF to increase the pace of restoration, a goal shared by the NCWFHC and the Forest Service. We will be sending you a separate letter outlining our proposed level of collaborative engagement and specific touch points.

Please contact Sarah Walker, Upper Columbia Salmon Recovery Board and NCWFHC facilitator, (509) 630-8226 or sarah.walker@ucsrb.org, with any questions.

Sincerely,

Mike Anderson, The Wilderness Society
NCWFHC Co-Chair

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