



March 27, 2019

Paul Kelley, Environmental Coordinator
Okanogan-Wenatchee National Forest
Wenatchee River Ranger District
600 Sherbourne St.
Leavenworth, WA 98826

Dear Mr. Kelley,

In response to the Okanogan Wenatchee National Forest (OWNF) Wenatchee River Ranger District (WRRD) February 22, 2019 request for formal comments on the Upper Wenatchee Pilot Project (Project) Purpose and Need and Proposed Action, the North Central Washington Forest Health Collaborative (NCWFHC) is pleased to submit collective, high-level feedback.

Overall, the Purpose and Need met our understanding of the Project at a broad level. We strongly support that the intent of OWNF is “to create a more resilient...landscape” across four sub-watersheds in the greater Lake Wenatchee area through the integration of aquatic and terrestrial restoration activities with human socio-economic values. This is a highly valued landscape ecologically, culturally, and socially that will benefit from a strategic plan and investment in passive and active management. We also strongly support the public disclosure through scoping on the potential project-specific amendment, to enable the Project to meet habitat restoration and risk-reduction objectives in older stands towards the reduction of unacceptable risk of large-scale disturbance and/or enhance late-successional conditions.

While we realize the OWNF-WWRD will bring additional details forth in the chapters that will be produced as the Project analysis process proceeds, based on the general Purpose and Need we recommend that the OWNF:

1. Address as much as possible of the vegetation restoration need identified in the landscape evaluation and maximize fuel reduction treatments at one time to protect lives and communities, consistent with the Purpose and Need, sustainable forest management practices and other plans and regulations covering the project area to:
 - Create forest resiliency to future disturbances by creating stand and landscape conditions informed by both the historical range of variability and anticipated future changes in climate conditions,
 - Reduce the risk of severe wildfire and other disturbances; and
 - Protect ecological values alongside lives and communities, particularly on National Forest System Lands within the Wildland Urban Interface.

- Conduct strategic passive and active forest management to allow the greatest benefits to the entire landscape of the project area.

The results of both the US Forest Service and WA Department of Natural Resources' (WDNR) landscape evaluations show there is a strong need and potential for treatments to increase the resiliency of the landscape. We recognize that WDNR's analysis recommends the Project area would benefit from 23-40% of the forested landscape being treated across all-lands, including maintenance of past treatment areas. However, we strongly recommend that the OWNF develop and analyze an alternative that will treat at least 33% of Forest Service lands in the Project area as a complement to necessary treatments on adjacent private and state lands. We also request that the Project environmental analysis reference the findings of the landscape evaluations and provide clear, sound and significant rationale as to how the treatment needs and opportunities identified in the landscape evaluations are driving the scope and action of treatments as well as where any deviations are suggested.

2. Describe the socio-economic benefits that active restoration of aquatic and terrestrial ecosystems can produce for local communities, such as employment opportunities, wood products, and reduced risk of uncharacteristic wildfire behavior.
3. Leverage commercial treatments to address as many of the forest health restoration needs in the project area as possible to achieve a blend of ecological, economic, and social goals. Commercial treatments will improve forest health, promote rural economic development, and provide retained receipts that can be invested to implement crucial non-commercial treatments that are necessary to achieve restoration goals in the project area.
4. Provide sustainable access for recreation, forest management and emergency management in a manner that maintains healthy watersheds and aquatic habitats.
5. Conserve the existing spotted owl habitat in the project area in balance with reducing the overall risk to existing habitat and restoring future sustainable habitat. The project area provides an exceptional opportunity to demonstrate how to manage owls in critical habitat to protect against the effects of catastrophic wildfire.
6. Maximize aquatic habitat restoration objectives within the four project sub-watersheds, consistent with the findings of the Forest Service's landscape evaluation that "many opportunities" exist and "that stream and habitat characteristics are generally a direct function of processes going on higher in the watershed".

The Project should focus on restorative actions that both address site specific actions and long-term causes of degraded conditions. The outcome of the alternatives analyzed in this project should be to move the conditions of these watersheds into a properly functioning status in the Watershed Condition Framework. This is critically important given the tenuous status of the three ESA-listed salmonid species within the project area: Upper Columbia spring Chinook (endangered), steelhead (threatened), and bull trout (threatened). We applaud the equal emphasis the OWNF-WRRD has placed on restoring the aquatic and terrestrial habitats within this landscape, and we look forward to continuing our work with the OWNF through the life of this project to ensure impactful outcomes.

7. Analyze the implementation of shaded fuel breaks adjacent to the vast majority of structures in the Wildland Urban Interface.

As part of their request for comments, OWNF-WRRD staff have requested that feedback focus on three questions:

1. Are there alternative ways to better meet the purpose of the project other than the proposed action we offer...?
2. Is there any information about the project area which you believe is important in the context of the proposed activities that you would like the Forest Service to consider?
3. What specifically are the potential effects of this proposal that you are particularly concerned about?

Our understanding is that the OWNF-WRRD team will soon be sharing Project physical and biological survey results and products with the Core Team and Aquatics and Terrestrial subgroups, members of which are also NCWFHC participants. Thus, the level of detail in our response to the questions posed above is limited at this time; however, we have provided general feedback below.

The Proposed Action includes a diverse suite of passive and active vegetation treatments available to meet the Purpose and Need; however, we are concerned that the use of prescribed fire to help restore both forest structure and process to the landscape is omitted. We believe the analysis should speak to the use of this important tool. The Project plan should clearly articulate the role of passive management and identify specific areas where the forest should simply be allowed to grow over time to meet landscape-level objectives. In addition, the project should clearly put forward alternatives that improve the status of all four sub-watersheds to properly functioning condition in the Watershed Condition Framework.

While the Proposed Action speaks to “establishing” fuel breaks and treatments to modify the fire flow through the landscape, we recommend it include an analysis of the value of “maintaining or adjusting” existing fuel breaks on the landscape, such as the highly visible Wolverine Fireline. Additionally, we believe that the Proposed Action should include an analysis of the role of past treatment actions from other projects (e.g., Natapoc) and discussion of any maintenance actions that have been necessary. Incorporating lessons learned from previous or ongoing efforts is critical to improving how projects are planned and implemented.

The Proposed Action references specific treatments (e.g., roads management, culvert removals) that will “protect and restore aquatic habitat and natural processes”. Although it is briefly mentioned that terrestrial species in the watershed “could also benefit”, we recommend this language be broadened to mention how changes to transportation and trail systems will help meet terrestrial goals such as reduced risk of fire ignitions, increased habitat quality (security and core habitats) and connectedness for wildlife species, and species recovery and land management area goals (i.e., to reduce road density to 1 mile per square mile in LSRs on the OWNF).

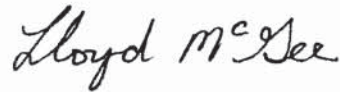
Lastly, as the Project will involve restoration treatments in LSRs and around nearby homes, we recommend the Proposed Action clearly articulate how it will reduce risk to both LSR habitats and adjacent infrastructure.

The Project provides a unique opportunity to use commercial treatments to support multiple objectives as stated above. Therefore, we would greatly appreciate the opportunity for engagement with OWNF staff on next steps in the process as early as is feasible and look forward to opportunities for enhanced collaboration with the OWNF-WRRD team as this important project moves forward.

Sincerely,



Tom Partin, American Forest Resource Council
NCWFHC Co-Chair



Lloyd McGee, The Nature Conservancy
NCWFHC Co-Chair