



June 10, 2016

Mike Liu, District Ranger  
Methow Valley Ranger District  
Okanogan-Wenatchee National Forest  
24 W. Chewuch Rd.  
Winthrop WA 98862

Dear District Ranger Liu,

Thank you for requesting input from the North Central Washington Forest Health Collaborative (NCWFHC) on the Methow Valley Ranger District's (MVRD) proposed action on the Mission restoration project. The NCWFHC appreciates the District's engagement on this project and collaborative approach to identifying potential restoration actions up to this point.

The NCWFHC is interested in increasing the pace and scale of restoration on the Okanogan-Wenatchee National Forest (OWNF) in part through integrating upland and aquatic restoration efforts. For this reason, the NCWFHC supports the intent of the MVRD to undertake watershed scale restoration and recognizes this project as an important first step forward in the new collaborative framework. We also support the application of the Okanogan-Wenatchee National Forest (OWNF) Restoration Strategy and the ultimate development and integration of an aquatic landscape evaluation as part of the Strategy.

In order to help the MVRD achieve its goal of building a healthier and more resilient ecosystem, the NCWFHC has the following comments and requests regarding the proposed project:

#### **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 MVRD 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 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 MVRD to provide this context as part of the proposal and to describe what elements the Mission Project will, and will not, address and why. Those actions that will not be addressed in the Mission Project should be addressed through future partnership and collaboration efforts in order to fully meet the goals of the 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 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. Currently, we have concerns that the proposed riparian treatments will not address the ecological concerns they are intended to address. Additionally, we have concerns about mechanical harvest in riparian reserves and strongly recommend hand-felling or girdling in these areas and either leaving the trees on site or using any tree removal in support aquatic restoration elsewhere in the project. We also have concerns with the proposals stated need to treat riparian areas to reduce uncharacteristic wildfire behavior. Best available science indicates that riparian areas characteristically burn more thoroughly than adjacent uplands and that such disturbances can have long term benefits for the aquatic environment. We support an approach to riparian treatments which follows aquatic, rather than upland, restoration principles and disturbance regimes. Any additional fire risk brought about by our proposed changes could be mitigated by employing other restoration techniques suggested in this document.
- **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. Specifically, we recommend addressing the two identified fish passage barriers over Smith Canyon and Black Pine Creek (Mission Project Aquatics Assessment Report, January 2016).

### **Upland Restoration Actions**

We support the need to restore ecological conditions and fire regimes within the Mission restoration project. We have specific questions regarding how the analysis conducted by Derek Churchill on behalf of the NCWFHC was or was not incorporated into the proposed actions and why. We understand that the landscape prescription derived using EMDS is refined as the project is developed. We would like to understand the process and rationale for this refinement and would like an assessment of how changes will or will not alter the project's ability to meet the purpose and need.

Specifically, we would like the MVRD to address the following variances from the recommendations made in Churchill's analysis.

- Increased amount of ladder fuel treatment and a 1000 acre reduction in commercial treatment acreage: Churchill's recommended commercial treatment was intended to reduce canopy cover and reduce ladder fuels in order to offer long term benefits and reduced treatment costs; how are the proposed changes addressing these considerations?
- Absence of treatments designed to promote old growth and large and old trees: Churchill's prescription identified a deficiency in old growth and large old trees in this landscape; however, the proposed action lacks a prescription specifically tied to this need. We recommend that the analysis addresses how individual large and old trees throughout the project areas, as well as within old growth stands, will be maintained, connected, and fostered. We also recommend the analysis include current and projected location, plant association, and spatial distribution of these large and old trees.
- Absence of treatments designed to address Dwarf Mistletoe: Churchill's prescription specifically addressed treatments in stands with Dwarf Mistletoe, however such treatments were not singled out in the proposed action but rather incorporated into other treatment types. Since treatments in such stands may have different prescriptions, we recommend the analysis explicitly address this.

The NCWFHC looks forward to continued collaboration on large-scale restoration projects in the Methow Valley Ranger District. The NCWFHC is committed to finding efficient and productive ways to engage with the District to increase the pace of restoration, a goal shared by the NCWFHC and the Forest Service.

Specifically, NCWFHC can support the project moving forward in the following ways:

- Help analyze potential costs and revenues, and identify strategies to increase the economic viability of the project;
- Leverage resources for project implementation; and
- Publicize NCWFHC support for project implementation.

Please contact Melody Kreimes, Upper Columbia Salmon Recovery Board and NCWFHC facilitator, (509) 888-0321 or [melody.kreimes@ucsrb.org](mailto:melody.kreimes@ucsrb.org), with any questions.

Sincerely,



Paul Ward, Yakama Nation  
NCWFHC Co-Chair



Lloyd McGee, The Nature Conservancy  
NCWFHC Co-Chair