



February 28, 2017

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

Dear District Ranger Liu,

We are writing to provide comment on the Mission Restoration Project Environmental Assessment (EA), building upon our scoping comments from June 2016. We continue to appreciate your District's collaborative approach to identifying restoration needs in the project landscape, and we look forward to engaging with you and your staff through not only planning but implementation and monitoring. Individual members of our collaborative may submit more substantive comments from their unique perspectives in complement to this joint letter, while this letter captures our shared feedback.

The North Central Washington Forest Health Collaborative (NCWFHC), launched in 2013 with facilitation by the Upper Columbia Salmon Recovery Board, is a diverse group of local stakeholders represented by timber industry, conservation groups, tribal government, elected officials, and local, state and federal land managers working together to obtain the resources and community support to accelerate landscape-scale forest restoration on the Okanogan-Wenatchee National Forest in Chelan and Okanogan counties. Our purpose is to advance forest health through transparent actions that improve forest resiliency, preserve terrestrial and aquatic wildlife habitat, protect natural resources, provide recreational opportunities, promote utilization of natural resources, and support local economies.

Overall, our collaborative is extremely supportive of the Mission Restoration Project and appreciative of the work the Methow Valley Ranger District (MVRD) has conducted to date using the Forest Restoration Strategy and integration of feedback to develop an integrated approach to aquatic and terrestrial restoration in the project landscape. We truly appreciate the commitment to aquatic ecosystem restoration that we so strongly highlighted a need for in our collaborative scoping comments, including the careful consideration given to water quality improvement, improved fish passage, and innovative restoration approaches, such as beaver habitat enhancement.

The two action alternatives (2 and 3) differ primarily in their treatment of a bridge over W. Buttermilk Creek and of the lands made accessible by that bridge. From an aquatics health perspective our collaborative would like to wholeheartedly support proposed actions described in Alternative 3. To help us reach consensus on a final action, however, we would like to see a more detailed discussion of the potential impacts to future terrestrial restoration objectives and fire management needs in areas that would remain closed under Alternative 3 but would become open under Alternative 2. While we are supportive of maximizing aquatics restoration opportunities in this project landscape, we believe it is

essential to critically analyze the benefits and drawbacks of proposed actions that may have conflicting results for terrestrial and aquatic objectives to inform a final action. We suggest the final EA discuss this potential tradeoff in greater detail and potentially consider a hybrid of Alternatives 2 and 3 to balance these objectives, as needed.

Hydrologic and Aquatic Restoration

The following includes Hydrologic/Aquatic Resources project elements we feel would strongly benefit from additional analyses and/or proposed actions in order to maintain consistency with the OWNF Forest Restoration strategy's emphasis on whole watershed restoration:

- Water Quantity: This Resource Element is identified as a key limiting factor in the project area: "Summer base flows are reduced from water withdrawals from private irrigation ditches and water transmission lines," (Hydrologic/Aquatic Resources Report, p. 13). However, the subsequent analysis of water quantity in the EA does not take water withdrawals into consideration: "Water rights are a legal issue outside of the scope of this project," (Hydrologic/Aquatic Resources Report, p. 38). The only water quantity resource indicator analyzed in the project, Beaver Habitat, while certainly important does not adequately capture the full spectrum of issues impacting water quantity within the two project watersheds. The Collaborative recommends MVRD analyze the broader suite of limiting factors affecting water quantity within the project watersheds in order to maintain consistency with the whole watershed restoration approach defined in the Restoration Strategy. In addition, the Collaborative would appreciate a more detailed treatment description and discussion of the scientific basis for proposed riparian thinning treatments for the purpose of improving water quantity. While it is briefly mentioned in the EA and Hydrologic/Aquatic Resources Report, this approach to instream flow improvements is new to a number of Collaborative members, and we would greatly appreciate a more detailed discussion.

- Water Quality: Livestock grazing is identified as factor limiting water quality within the project area: "Riparian roads and livestock grazing are chronic sources of erosion and sediment delivery," (Hydrologic/Aquatic Resources Report, p. 12), but its analysis is omitted by the EA due to its coverage under the 2011 Grazing Allotment Management Plan (USDA 2011). The Collaborative understands the Forest Service's need to prevent overlap with previous NEPA analyses and decisions. However, precedent has been set within the OWNF for projects to address resource protection/enhancement needs associated with other uses (e.g., livestock fencing, Tonasket District, North Fork Mill Project A to Z, 2015). Because livestock-related impacts to water quality within the project area have been identified as a significant limiting factor, we strongly recommend using the opportunity presented by the Mission Restoration Project to address this issue. Specific livestock allotment improvements to consider in the Mission Restoration Project include a need to maintain existing fencing, modify some existing fencing and install some additional fencing to meet the intent of the riparian management objectives for the Lookout Mountain Allotment plan:
 - The upland water trough located off Road 4300400 is in need of repair. Cattle can get under the fence and are trampling the springs. Also, this enclosure should be increased in size downslope to protect the intermittent stream banks and springs.
 - From this enclosure and following the abandoned road bed down slope toward the Buttermilk Creek Bridge, there is a sizable area of springs and seeps (maybe 5 acres) that are heavily impacted by cattle. This area should have additional investigation and based upon the investigation; fencing may be needed to protect the riparian area.

- The fencing following Road 4300215 crosses a small creek and riparian area. Rather than follow the road, the fencing should be relocated upslope to protect the riparian area currently outside the enclosure.

Note: The road inventory work previously submitted by the NCWFHC includes pictures and descriptions of these areas.

Terrestrial Restoration Treatments

Having engaged closely in project development through the EMDS process that led to a landscape evaluation through this EA, we note that the original acreage proposed for commercial mechanical treatment has been reduced substantially (5000 acres to 1952 acres). We realize that the Forest Restoration Strategy lays out a process where the landscape evaluation is only a starting framework to inform the actions proposed in an actual project proposal through NEPA, and that multiple barriers including access and slope restrict the acres that can be treated. In the final EA and our ongoing discussions with your district we would like demonstration of action in the alternatives to clearly follow from the landscape evaluation produced by EMDS analysis and when there are deviations from that proposal, provide a rationale. EMDS identified a desired future condition that would thin several thousand more acres commercially over the preferred Alt 2. These unit prescriptions were changed to ladder fuel reduction and prescribed fire and some had access limitations and steep slopes, but the project timeline and staff availability may also have been limiting. Due to the heavy investment in the landscape evaluation process, it is important that we clearly track and understand where and why deviations from landscape evaluation to proposed action occur to both inform our engagement and find areas where we can more strategically collaborate on solutions.

In addition to the forested landscape in the project area, there are high value shrub-steppe habitats. Most of the area east of Ben Canyon and north of Libby Creek is dominated by shrub lands, where we would like to see a significant shrub-steppe management component for vegetation including thinning, pruning and prescribed fire. We understand the need for temporary mule deer forage until areas burned by the 2014 and 2015 fires to recover, but this will take less than a decade. Until then the lack of treatments in the shrub-steppe will not meet the project's Purpose and Needs of wildfire hazard reduction and wildlife habitat enhancement. Until the shrub-steppe fire regime is restored, uncharacteristically dense shrub lands can negate the value of other fuel reduction objectives because they support rapidly spreading, running crown wildfires that can't be controlled well with ground crews. A possible scenario from not treating the shrub-steppe in this project could involve fast-moving shrub-steppe fires spreading north into McClure Peak. This is confirmed by the fire sending map in the EMDS report by Derek Churchill (Figure 3). This scenario occurred in the first few days of the Carlton Complex Fire, when the fire jumped the Methow River near Gold Creek and moved northward via shrub-steppe into Libby Creek, destroying buildings on the Hirschstein property within hours. The tragic loss of life in the Twisp River Fire also involved rapidly changing fire behavior in shrub-steppe vegetation. In addition to the important wildfire hazard reduction goals, direct restorative management of shrub-steppe vegetation will positively affect wildlife that are adapted to grasslands including mule deer, western gray squirrel, and gray flycatchers.

Additional Action Alternative Specific Feedback

Located on roads to be decommissioned are a slump and a slide that should have additional geological investigation before these roads are closed. Additional measures may need to be incorporated into the decommission design. This may prevent future problems and avoids opening and closing decommissioned roads if additional work is required. The slide actively flowing into East Buttermilk Creek is on Road 4300417. This slide appears to have been treated in the past, but there are surface indicators showing the slide remains in an active state. The slump is located on Road 4300480. It is in the early

stages and there are surface indicators of slumping and wasting that indicate more activity may occur. Notes and pictures of these two problem areas are contained in the road inventory work submitted by the NCWFHC.

As part of decommissioning roads, we recommend that you include treatments to eliminate established invasive plant species. It may save future disturbances and reduce the overall cost of treatments.

Economics and Implementation

Economic and community benefits from forest restoration are important to our collaborative, as well as the ability to generate resources to ensure implementation of the complete final decision including both the commercial and non-commercial components.

We support the purpose and need of the Mission Restoration Project, which is focused on improving hydrologic function, aquatic habitat, soil productivity, vegetation composition and structure, wildlife habitat, wildfire conditions in the wildland urban interface (WUI), and the transportation system. However, we recommend that an additional purpose and need be added to the project that reflects the need for economic and community benefits to the surrounding areas as a by-product of ecological restoration. This includes providing raw materials to maintain the local milling infrastructure and contracts to accomplish restoration actions such as road upgrades and restoration.

Additionally, two tables in the EA underscore the gap between the commercial value generated by the project and the costs of the non-commercial components. The EA states that the timber sale is viable according to the analysis and is estimated to generate \$310,000, while restoration needs in the project exceed \$2 million. Recognizing this gap, in the short-term for this specific project our collaborative is highly interested in discussions that increase economic efficiencies and outcomes of the project while partnering with your district to seek external funding to accomplish the non-commercial work. Discussions have already begun between your staff and our Projects Workgroup to this end, and we look forward to continuing them. In the longer term, our collaborative is interested in discussions on this topic with your district and forest wide, as it is relevant to nearly all Integrated Vegetation Management Projects.

Thank you for consideration of our comments to date and within this letter. These watersheds are a high priority for restoration ecologically, economically, socially, and culturally. We look forward to continued collaboration with your district on project planning and implementation.

Sincerely,

The image shows two handwritten signatures in black ink. The signature on the left is 'Lloyd McGee' and the signature on the right is 'Paul Ward'. Both are written in a cursive, flowing style.

Lloyd McGee
NCWFHC Co-Chair

Paul Ward
NCWFHC Co-Chair

cc: Meg Trebon, MVRD
Jen Watkins, NCWFHC Projects Workgroup Chair