



12/12/2019

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

Dear District Ranger Furr,

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 Twisp Restoration Project. The NCWFHC appreciates the MVRD's engagement on this project and participation in our various meetings and field trips.

THE NCWFHC is interested in increasing the pace and scale of restoration on the Okanogan-Wenatchee National Forest (OWNF) and strongly supports projects that help achieve this goal. For this reason, the NCWFHC supports the purpose and need for the Twisp Restoration Project. The NCWFHC encourages the OWNF to fully analyze a comprehensive list of restoration needs and activities within the project area and consider all treatment options to maximize the restoration benefits of this project.

In order to help the MVRD achieve its stated purpose and need, the NCWFHC has the following comments and/or requests regarding the proposed project:

Aquatics Restoration Actions

NCWFHC applauds the strong focus and importance placed on protecting and restoring aquatic habitats described in MVRD's proposed action. We encourage the MVRD to maximize the aquatic habitat restoration objectives within the planning area, with a priority of maintaining and increasing the amount of high-functioning quality habitat for aquatic organisms. This is a high priority watershed for the recovery of federally listed bull trout, Upper Columbia spring-run Chinook and steelhead. Given recent wildfire activity in the watershed, it will be important to analyze and potentially develop alternatives to address post-fire flood risks and sedimentation that can be exacerbated by human infrastructure such as roads, culverts, and development. Additionally, we encourage MVRD to conduct a thorough analysis of how existing roads, both authorized and unauthorized, impact aquatic habitat, particularly for federally listed species. We are encouraged by the use of LiDAR as a tool for analysis and encourage its use on future projects across the Forest, and we appreciate the progress toward developing a standardized replicable approach for aquatic conditions assessments and restoration planning Forest-wide. We are also supportive of requiring site-specific analysis of all aquatic and vegetation restoration activities proposed in riparian areas or areas that impact aquatic resources in the project area.

Some specific comments NCWFHC has for MVRD to consider are:

- Use large wood material in projects to promote instream habitat complexity and to restore channel/floodplain interactions.

- Use beaver dam analogues where suitable to create aquatic habitat complexity and store flood flows in the upper watershed;
- When possible, allow trees to be sourced locally, preferably from within the project area, for use as large woody material in aquatic restoration projects;
- Remove undersized culverts and other barriers to allow for aquatic organism passage and to prevent sedimentation issues;
- Create a framework to suggest where stage zero restoration techniques might be suitable and feasible to achieve aquatic restoration targets;
- Thoroughly analyze and develop a comprehensive roads plan to understand where current and future roads are, determine the impacts they have on aquatic habitats, and propose actions to comprehensively address impacts especially where federally listed fish stocks occur.

Upland Restoration Actions

As stated above, NCWFHC encourages the MVRD to fully analyze a comprehensive list of restoration needs and activities to maximize the ecological, economic, and social benefit of the project. We support the need to restore the ecological condition and fire regime within the Twisp Restoration project. The NCWFHC supports the use of the landscape evaluation and scientific tools to identify departure from historic reference conditions with the goal of restoring spatial distribution and abundance of large fire resilient trees. Finally, with multiple projects having gone through the environmental analysis with the Restoration Strategy as a framework, we hope the MVRD and OWNF will incorporate lessons learned from previous successes and any missed opportunities to develop a robust, restorative project.

Some specific comments NCWFHC has for MVRD to consider are:

- We support suggested amendments to the Forest Standards and Guidelines.
 - Two Forest Plan S&Gs would be amended to allow treatments that would reduce deer winter range cover (including snow-intercept thermal and winter thermal) in Management Areas (MA) 14 and 26.
 - We also support amending two Forest-wide Standard & Guidelines to allow treatments consistent with the Restoration Strategy in Forest Plan Old Growth (FPOG) stands. These include amending:
 1. S&G 5-1: No scheduled or non-scheduled timber harvest or firewood collection shall be permitted in mixed conifer old growth stands.
 2. S&G 19-8: Treatment of natural fuels shall be prohibited in identified old growth stands.
- Address as much of the vegetation restoration need identified in the landscape evaluation as is possible at one time, 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.
- Leverage treatments to address as many of the forest health restoration needs in the project area as possible to achieve ecological goals that accrue economic and social benefits;

- Use site-specific analysis for project elements in inventoried roadless areas and late successional reserve;
- We are supportive and encouraged by the expanded use of prescribed fire and the ongoing use of maintenance burning into the future;
- Similarly, using variable density thinning from below to restore stand structure is also encouraged;
- Maintain habitat connectivity for wildlife through road density management;
- Analyze the need for potential treatments within the footprint of the Crescent Fire to meet the goal of the project, as aligned with the results of the LE;
- Does MVRD have a monitoring plan for determining if the stated outcomes of the project are achieved? NCWFHC encourages the Forest to coordinate with Washington State Department of Natural Resources on their ongoing monitoring efforts, specifically in this project area;
- Lastly, we recommend incorporating community socio-economic benefits as a stand-alone Purpose and Need statement to emphasize what 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.

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:

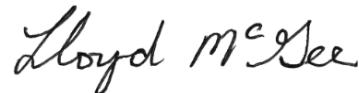
- Help analyze potential costs and revenues, and identify strategies to increase the economic viability of the project;
- Leverage resources for project implementation; and
- Publicize NCWFHC support for project implementation.

Please contact Pete Teigen or Sarah Walker, NCWFHC facilitators with Upper Columbia Salmon Recovery Board, at pete.teigen@ucsr.org or sarah.walker@ucsr.org, with any questions.

Sincerely,



Chris Branch, Okanogan County Commission
NCWFHC Co-Chair



Lloyd McGee, The Nature Conservancy
NCWFHC Co-Chair