



June 11, 2013

Margaret Hartzell
Okanogan-Wenatchee National Forest
United States Forest Service
215 Melody Lane
Wenatchee, WA 98801

RE: Forest Plan Revisions and the Yakima Basin Integrated Plan

Dear Ms. Hartzell,

On behalf of the Yakima River Basin Water Enhancement Program Workgroup (“Workgroup”), we offer these preliminary comments on the pending Forest Plan Revision for Okanogan Wenatchee National Forest (“OWNF”) and offer to work closely with the United States Forest Service to achieve our mutual goals. As you know, the Workgroup is developing a long-range economic and ecological sustainability plan for the Yakima Basin; there are areas of significant intersection between OWNF Forest Plan Revision and the watershed elements of the sustainability plan. We request that as alternatives are developed, and their effects analyzed, for the Forest Plan Revision Draft Environmental Impact Statement (DEIS), the elements and approaches that the Workgroup developed be considered for incorporation. We recognize that these comments are not within a formal comment period. However, the Workgroup suggests that as the Yakima planning and implementation and the Forest Plan Revision processes develop, there are areas for which discussion and coordination will be useful. We believe that there are issues where working together in bringing the Forest Plan Revision and Yakima planning processes into alignment will help both efforts to achieve greater results, and commit to working with the Forest Service to engage in that work.

Background

Since 2009, a group of people and institutions deeply engaged in the Yakima River basin have worked with the support of the Bureau of Reclamation and Washington’s Department of Ecology to lay out a long-range plan to contribute to economic and ecological sustainability for the Yakima Basin. The result of that work is the Yakima Basin Integrated Plan (“YBIP”) (<http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/plan/integratedplan.pdf>). Taking a broad view of water supply reliability and fishery restoration, the Workgroup and YBIP recognize that protecting and restoring watershed health is essential to meeting the overall goals.

The goals of YBIP are to:

- Protect, mitigate, and enhance fish and wildlife habitat and populations;
- Provide increased operational flexibility to manage instream flows to meet ecological objectives, and

- Improve the reliability of the water supply for irrigation, municipal supply and domestic uses.¹

Linkage between YBIP and OWNF land management stems from much of the water in the Yakima River system arising on OWNF lands and a significant proportion of the habitat needed to achieve salmonid fishery restoration and wildlife goals lying in the OWNF. Recognizing the need to incorporate land management to achieve YBIP goals, the Workgroup established a Watershed Land Conservation Subcommittee (“Watershed Land Subcommittee”) to identify a set of options for ensuring that the condition and management of watershed lands within the Yakima Basin support the water supply and fishery goals. The result was a January 4, 2012 Watershed Land Conservation Subcommittee Proposal (“Yakima Watershed Proposal”) (<http://www.usbr.gov/pn/programs/yrbwep/2011integratedplan/2012meetings/2012-01-04/wtrlandssubfinal.pdf>) that outlines a set of proposed land acquisitions, public land designations on the OWNF, and river corridor designations under the Wild and Scenic Rivers Act. These watershed land actions are proposed to meet goals of ecological restoration and sustainability as well as economic vitality, given the increasing recreation-based economy of the region – in many ways these mirror goals for the OWNF

Support for YBIP Goals in Management of National Forest Lands

As the OWNF develops its set of alternatives for the Forest Plan Revision DEIS, on behalf of the Workgroup the Watershed Land Subcommittee requests that the following issues be considered and alternatives that address the issues be developed:

Protection of habitat for salmon, steelhead and bull trout

A primary goal of YBIP is comprehensive restoration of habitat and access to blocked habitat for salmon, steelhead and bull trout in order to restore healthy and abundant naturally reproducing and supplemented fishery populations. Achieving this goal will require a suite of actions to improve connectivity, allowing fish to move from the Columbia River to the Cascades headwaters through improved river flow regimes, mainstem and tributary habitat restoration, provision of upstream and downstream passage at six Bureau of Reclamation reservoirs and acquisition of significant tracts of private forestry lands, especially in the Teanaway River basin and checkerboard in the Naches River basin. Investment in these elements is proposed to be significant: fish passage infrastructure costs alone are estimated at \$434.2 million (in 2012 dollars); acquisition of the Teanaway River tract is approximately \$100 million; and the project budget for mainstem and tributary habitat improvements is over \$480 million. Land management on the OWNF will affect clean water and habitat on which these investments and objectives depend.

We request the Forest Plan Revision DEIS place a high priority on land use and management activities that support fishery restoration. Some of the areas of greatest concern include forest

¹ Yakima River Basin Study: Proposed Integrated Water Resource Management Plan (2011), Volume 1, p 1.

that supports salmon, steelhead and bull trout habitat. This includes land immediately adjacent to rivers and streams as well as land upstream of habitat; for instance, OWNF land upstream of the proposed Teanaway acquisition will affect habitat quality important to meeting the YBIP fishery restoration goals. The habitat of concern is not just currently occupied habitat, but also habitat that may become accessible once fish passage is installed at the Bureau of Reclamation dams or other barriers (flow, temperature or physical) are removed.

Forest management for water quality and water supply

At a national level, the USFS increasingly recognizes that forest health is linked to water quality and water supply. Should significant areas of forest upstream of the Reclamation reservoirs or fish habitat burn, the result will likely be sediment slugs that degrade water quality, blanket habitat with sediment and reduce reservoir storage capacity. Because all of these are contrary to YBIP goals, there is a clear connection between fire-related forest health and YBIP. Looking ahead, there may be forest prescriptions that promote retention of snowpack and retard spring melt – these will be of increasing importance to YBIP water supply as the climate continues to warm.

The request is for Forest Plan Revision alternatives and analysis link the benefits of good forest health and fire management to the water quality and water supply elements of YBIP.

Economic uses of land

Recreation and other economic uses of public lands in the Yakima watersheds are important parts of the regional economy. The Yakima Watershed Proposal stresses that maintaining economic uses where lands have historically been used as working lands is important where this is consistent with protection of key watershed functions and aquatic habitat. The goals also include maintaining and, where possible, improving access to lands and enhancing opportunities for a variety of recreational uses, again, where this is consistent with protection of key watershed functions and aquatic habitat. We recognize that recreation and economic land use will need to be shaped and managed; in some areas, those uses will be prioritized and in others conservation and habitat restoration will be.

Areas of specific interest

While the entire Yakima watershed on OWNF land is ultimately of interest to YBIP, several areas are of specific concern because they are closely linked to YBIP goals and activities. Special attention in formulating alternatives is requested for the following areas:

- *Upper Teanaway watershed lands.* YBIP anticipates acquisition of downstream private forest lands and fishery restoration activities. Management of the upstream watershed should take into account these investments and activities. This area is also important for recreation, so appropriately shaping and managing

recreation impacts in the area is of significant importance both for the fish and wildlife and the local recreation-based economy. This can be done in part through the context of the Special Interest Area for recreation that currently exists on a portion of these lands.

- Manastash-Taneum watershed lands. These and downstream lands are also the focus of significant fishery restoration investments and important to recreation, posing similar challenges as the Teanaway.
- While not specifically identified in the Yakima Watershed Proposal, in the Naches River basin and especially the Little Naches there also a need to shape and manage the heavy recreational use which has a high potential for conflict with fish and wildlife restoration.

Specific Designation Proposals for the OWNF

In the Yakima Watershed Proposal, the Watershed Land Subcommittee made several specific designation proposals that we request be included in the alternatives developed for the Forest Plan Revisions DEIS. Identifying areas suitable for Wilderness and Wild and Scenic Rivers designation is part of the Forest Plan Revision process; for the areas we identify below, we request that proposed designation be included in the DEIS alternatives.

The Yakima Watershed Proposal also includes an option for designation of lands as National Recreation Areas. The goal for these NRA designations was to shape land management in a way that protects key habitat functions, while preserving and potentially enhancing, the economically important recreational economy. The point is to encourage responsible recreation (summer and winter motorized, summer and winter backcountry non-motorized, including mountain biking) and balance that recreation so that the watershed, fish and wildlife and habitat functions are retained and, where necessary, restored. Changing the name to “National Conservation and Recreation Area” has been proposed as a way of signaling the intended balance. We request that in alternatives developed for the Forest Plan Revision DEIS, special attention be placed on achieving that balance and that appropriate administrative tools be utilized to do so (e.g. aligning the Special Interest Areas with these management goals and/or utilizing another zoning tool to the same end.)

The areas proposed for designation in the Yakima Watershed Proposal include the following which we request be included in the DEIS alternatives:

- Wilderness additions to the southern portion of the Alpine Lakes Wilderness within the Yakima Basin, as in the 2011 Proposed Action;
- Wilderness additions to the William O. Douglas Wilderness that accommodate an expansion of Bumping Reservoir with attendant road reconstruction and replaced recreational facilities and access.

- Upper Yakima NRA/NCRA of approximately 100,000 acres (centered on the Teanaway Inventoried Roadless Area) with a mix of zoned uses.
- Manastash-Taneum NRA/NCRA of approximately 41,000 acres (centered on the Manastash-Taneum Inventoried Roadless Areas) with a mix of zoned uses.
- Designation of the following rivers as Wild and Scenic recognizing the value of these rivers for fishery and recreational purposes:
 - Upper Cle Elum River;
 - Waptus River;
 - Cooper River;
 - North, Middle and West Forks of the Teanaway- Given the proposed very substantial state investment in acquiring private lands in the Teanaway basin based on outstanding recreational, scenic, fishery and wildlife values, we request that the USFS reconsider its analysis of the Wild and Scenic potential of these rivers;
 - South Fork of the Tieton;
 - Indian Creek;
 - Rattlesnake Creek;
 - Deep Creek;
 - American River; and
 - Rainer Fork.

Administrative designation of some of these areas (particularly Wilderness and Wild and Scenic Rivers) will be considered during the Forest Plan Revision process as will shaping of the balance of uses for other of the areas. The Workgroup currently has no plan to seek formal Congressional designation for these lands as the Forest Plan Revision and Travel Management Planning processes go forward. Rather it is our intention to defer as these administrative processes develop, participate as appropriate, and later seek designations that build upon the administrative outcomes where doing so will help to achieve the goals of YBIP.

As you are aware, the Watershed Lands Subcommittee is currently refining some of the elements of the Yakima Watershed Proposal. We want to work with the Forest Service where doing so may be useful in meeting the goals of both the OWNF and YBIP – we believe that for issues such as fire management, watershed health, recreation management and habitat restoration working together will be needed. We welcome guidance from the OWNF on ways to effectively implement and refine the Yakima Watershed Proposal. We welcome the opportunity to clarify or explain these proposals and to work with you to shape actions both on and off the OWNF to achieve our mutual goals.

This letter focuses on the landscape-scale land management issues and special designations of public lands and waters. The Integrated Plan also proposes a number of other actions that involve various resources and public amenities managed by the Forest Service. We look forward to close

June 11, 2013

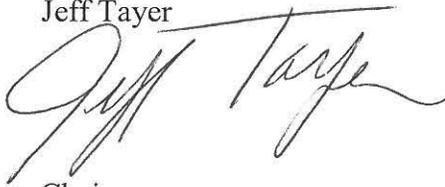
Page 6

cooperation with the Forest Service in the review of all actions that affect Forest Service resources and services, in order to maximize the public benefits and ecological improvements intended by both the Integrated Plan and the Forest Plan.

Should you have any questions regarding these issues, please contact Jeff Tayer as the chair of the Watershed Land Subcommittee, Andrew Graham, HDR, consultant to the subcommittee, or any member of the Subcommittee.

Very truly yours,

Jeff Tayer

A handwritten signature in black ink that reads "Jeff Tayer". The signature is written in a cursive style with a horizontal line extending from the top of the "T" across the signature.

Chair,
Watershed Land Conservation Subcommittee,
Yakima River Basin Water Enhancement Project
Workgroup

On behalf of the Watershed Land Conservation
Subcommittee:

Paul Jewell, Kittitas County Board of Commissioners
Phil Rigdon, Yakama Nation
Rick Roeder, Washington Department of Natural
Resources
Joel Freudenthal, Yakima County
Urban Eberhart, Kittitas Reclamation District
Cynthia Wilkerson, The Wilderness Society
Steven Malloch, National Wildlife Federation

Cc:

Becki Heath, OWNF Forest Supervisor
Clint Kyhl, OWNF Deputy Forest Supervisor
Mary Bean, OWNF Recreation Program Manager/ Forest Plan Revision Team
Senator Maria Cantwell
Senator Patty Murray
Representative Dave Reichert
Representative Doc Hastings