



August 4, 2020

Meg Treborn
North Zone Environmental Coordinator
24 West Chewuch Road
Winthrop, Washington 98862

Dear Meg:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on amending specific standards and guidelines in the Okanogan Land and Resource Management Plan as they relate to old growth forests and vegetative cover used by deer.

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Okanogan-Wenatchee National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

Forest Plan Old Growth

The Okanogan Forest Plan has two Standards and Guidelines that currently prohibit scheduled and unscheduled timber harvest, firewood collection and treatment of natural fuels in identified old growth stands. Many of these stands developed on fire-dependent landscapes with frequent disturbance by wildfires. After decades of fire suppression, and in the absence of any thinning or prescribed fire treatments, these stands have become denser with multiple layers of vegetation and increased surface fuel loadings. These conditions increase the risk of uncharacteristically severe fire behavior, with a higher likelihood of mortality and loss of habitat for species that depend on old forest structure. Since the Forest Plan was written, accepted science demonstrates that thinning by mechanical means and treating natural fuels with prescribed fire can help maintain old-growth stands and the habitat they provide by reducing the potential for stand-replacing fires.

Treatments allowed by proposed amendments could include a combination of non-scheduled timber harvest, hand and machine piling, pile burning, and underburning to enhance resilience to disturbance without degrading Forest Plan Old Growth designation.

The existing Forest-wide Standards and Guidelines include:

- No scheduled or non-scheduled timber harvest or firewood collection shall be permitted in mixed conifer old growth stands.
- Treatment of natural fuels shall be prohibited in identified old growth stands.

The Proposed Standards and Guideline Changes Include:

- No scheduled timber harvest shall be permitted in mixed conifer old growth stands. Materials generated by treatments in these stands may be sold as timber or utilized as firewood.
- Treatment of natural fuels shall maintain old-growth characteristics as described in the definition of “old growth stand.”

Deer Cover Levels

The Okanogan Forest Plan contains one Forest-wide Standard and Guideline and several management area-specific Standard and Guidelines addressing deer cover management. Cover levels prescribed by the Forest Plan are no longer supported by accepted science, which recognizes that adequate levels of quality forage in the spring, summer, and late fall are more critical for deer to survive winter than the Forest Plan’s prescribed levels of thermal cover, because this forage. Proposed Okanogan Forest Plan amendments and related substantive provisions will allow deer to build their reserves to sustain them over the dearth of forage during the winter. Forage quantity and quality are greater in landscapes with less canopy closure than is called for in current Standard and Guidelines.

The changes to Standards and Guidelines described below would allow for treatments in deer cover types according to the historic range of variability (HRV) for vegetation as determined on a project-specific basis at the landscape level.

The Proposed Standards and Guideline Changes addressing deer cover management include:

- Forest-wide 6-1, MA5-6A, MA5-6D, MA14-6A, MA14-6C, MA25-6A, and MA26-6A: Summer and winter range cover and forage for deer are managed within the historic range of variability for vegetation on a landscape-level basis.
- MA14-6B, MA26-6B: Where natural vegetation is not present to support the cover amounts indicated by historic range of variability for vegetation, manage existing vegetation to approach cover objectives on a sustained basis. Where potential is not present as a result of previous management actions, manage to attain these objectives.

AFRC supports the Proposed Standards and Guideline changes for both Forest Plan Old Growth and deer cover management. The only way to fireproof and keep old growth stands healthy from insects and disease is to perform both commercial and non-commercial management activities. Regarding deer cover vs. forage, many new studies have outlined the importance of early seral forage and one of the best ways to achieve this is to do both commercial and non-commercial

management activities that will open up stands to sunlight which will allow growth of early seral species full of the nutrients deer need for the winter months. AFRC believes a thinning regime of leaving 40 sq. ft. of basal area will best achieve the early seral needs.

Thank you for the opportunity to comment on Amending specific standards and guidelines in the Okanogan Land and Resource Management Plan as they related to old growth forests and vegetative cover used by deer. We look forward to implementing some of this work on upcoming forest treatment projects.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Partin". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Tom Partin
AFRC Consultant
921 SW Cheltenham Street
Portland, Oregon 97239