January 27, 2021

United States Forest Service

Wenatchee River Ranger District

Attn: Paul Kelly

600 Sherbourne

Leavenworth, WA 98826

Subject: Draft WDFW Comments - Upper Wenatchee Pilot Project Draft EA

Dear Mr. Kelly,

Thank you for providing the opportunity for the Washington Department of Fish and Wildlife (WDFW) to comment on the Upper Wenatchee Pilot Project Draft Environmental Assessment (Draft EA). WDFW’s interest in this project is based on our agency’s mandate to perpetuate fish, wildlife, and their habitat (RCW 77.04.012). WDFW appreciates the opportunity to offer comments on the Upper Wenatchee Pilot Project and supports conducting restoration on the forest in order to move it towards a more historic range of variability, while recognizing that fire has historically played a large role in shaping the diversity of habitats found throughout the Wenatchee basin and throughout northcentral Washington.

Terrestrial Resources

Wildlife Species

There are anticipated impacts to several resource indicator species that rely on late successional forests. These species, including the northern spotted owl (*Strix occidentalis caurina*), northern goshawk (*Accipiter gentilis*), fisher (*Pekania pennanti*), and marten (*Martes Americana*), rely on late successional forests where they currently exist. Management actions within these old forest areas should be carefully and incrementally staged in order to maintain diversity and serve as habitat strong holds for these species while other less suitable habitat matures through active management over time.

Although WDFW understands the increased acceptance of risk from fire and disease of Alternative 2, with approximately 11% less treated acres compared compared to Alternative 1; we believe Alternative 2 provides more functional habitat for a greater variety of wildlife species including northern spotted owl, lynx (*Lynx canadensis*), gray wolf (*Canis lupus*), grizzly bear (*Ursus arctos horribilis*), mule deer (*Odocoileus hemionus*), elk (*Cervus canadensis*), northern goshawk, and marten by preserving a larger amount of total habitat including in the form of Late Successional Reserve (LSR). Alternative 2 provides for the same number of miles of new shaded fuel break, acres of private land interface, prescribed fire, miles of road closed and decommissioned roads as Alternative 1.

The proposed project area falls within designated critical habitat for the northern spotted owl in the Wenatchee River watershed. The initial intent of LSRs under the Northwest Forest Plan (NWFP) was to provide spotted owl habitat now where it exists and into the future. Further, Alternative 2 follows the NWFP and Wenatchee Land Use Plan. These guidelines are set up to protect all habitat within the NSO home ranges.

Spotted owls, northern goshawks, fisher and marten all utilize the same type of habitat - high quality late successional forest composed of multiple canopies. Maximizing the preservation of existing late successional forests while also promoting development of additional old forests will provide spotted owl nesting, roosting and foraging (NRF) habitat that also benefits other old growth obligate species. According to the Department of Natural Resources’ Forest Health Assessment, by managing 30% to 40% of the landscape to resist wildfire, the forest will be in a more resilient condition when fire comes. With this information in mind, we recommend minimizing the conversion of NRF habitat to maintain the diversity of species that use this increasingly rare habitat.

Aquatic Resources

WDFW supports the project’s watershed goals and recognizes the critical need to improve aquatic and riparian habitats and floodplains by reducing the detrimental effects of roads on these aquatic habitats. Due to a lack of specific details about current riparian conditions, and specific proposals for treatment, it is hard to make substantive comments with regards to the generalized treatment options. However, WDFW would like to emphasize our support for decommissioning roads, reducing sediment inputs, and removing barriers to aquatic organism passage.

WDFW welcomes the opportunity for continued collaboration with the Wenatchee Ranger District as you continue the work to develop the Upper Wenatchee Pilot Project. We offer these comments with the goal of achieving the maximum environmental benefit possible for this project and the community, while minimizing associated risks and impacts to fish and wildlife. Please keep me informed of further opportunities to provide review and input. If you have any questions, please contact me at (509) 997-9428 or lynda.hofmann@dfw.wa.gov.

Thank you,

Lynda Hofmann

WDFW Fish and Wildlife Biologist

Northcentral Washington

Cc: Chris Conklin, WDFW Habitat Program Assistant Deputy Director

Carmen Andonaegui, WDFW Region 2 Habitat Program Manager

Amanda Barg, WDFW Region 2 Assistant Habitat Program Manager

Gary Bell, WDFW Forest Habitat Section, Wildlife

John Heimburg, WDFW Forest Habitat Section, Aquatics

Benjamin Majsterek, WDFW Region 2 Habitat Biologist