



North Central Washington
AUDUBON SOCIETY

North Central Washington Audubon Society
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Submitted via: <https://cara.ecosystem-management.org/Public/CommentInput?project=49124>

RE: Upper Wenatchee Pilot Project Draft Environmental Assessment

District Ranger Rivera:

North Central Washington Audubon Society (NCWAS), with approximately 500 members in Okanogan, Chelan, Douglas, and Ferry counties is very familiar with the lands and waters the Upper Wenatchee Pilot Project area encompasses. We attended both the project's early 2019 Open House near Lake Wenatchee and the virtual meeting in January 2021. We offer the following comments regarding the draft Environmental Assessment (EA) for the Upper Wenatchee Pilot Project.

The project's goals of improving conditions of all important habitats across the area appear to be generally in line with policies and actions we typically promote. We also support its intent to return the area, as much as possible, to the healthier conditions that prevailed prior to settlement of the area. However, while we have a fairly good general understanding of it, we feel less informed regarding specifics. Below are several thoughts we submit to the process.

- We favor Alternative 2. This said, we suggest it be strengthened to offer greater protection for Northern Spotted Owl (NSO) habitat, roadless areas, and Late Successional Reserves. Any activities being considered within them must not undermine or degrade the important values they offer to wildlife. In particular, disturbance or intrusion into these areas should be avoided or at least minimized as much as possible. Some specific areas of concern include:
 - Nason Ridge Roadless Area

- Mad River Roadless Area and LSR
- Glacier Peak Wilderness, Upper Big Meadow Creek, and nearby roadless areas.
- Natapoc Ridge LSR
- We support a significant reduction of the roads network. Habitat health should be prioritized while still permitting general access for the area.
- Decommissioned roads should be permanently closed to all motorized activities, though some might be restored and converted to trails for compatible low impact recreation.
- One goal should be to promote a historically more natural forest structure as quickly as possible. We suggest a 15" maximum trunk diameter for thinning and 18" diameter for commercial scale logging activities. Such criteria should be clearly stated in the final documents.
- To the extent possible, all project activities should be timed to accommodate the breeding and rearing seasons of wildlife. Most bird species, for example, nest between April and July. Burning, thinning, and logging should, to the extent possible, avoid this time frame.
- Priority should be given to achieving the presence of the full complement of fish and wildlife that historically occupied the project area. This includes not only those currently there, but also grizzly bear, wolverine, and wolves.

Finally, given the project's scale, NCWAS suggests a full Environmental Impact Statement process be conducted to assure the best possible outcome is realized.

Sincerely,



Mark Johnston

Conservation Chair, North Central Washington Audubon Society