



February 12, 2021

Jeffrey A. Rivera, District Ranger
Okanogan-Wenatchee National Forest
Wenatchee River Ranger District
600 Shelburne Street
Leavenworth, WA 98826

RE: Upper Wenatchee Pilot Project Draft Environmental Assessment

Dear Mr. Rivera,

On behalf of Conservation Northwest, please accept these comments on the Upper Wenatchee Pilot Project draft environmental assessment (EA). Conservation Northwest has a 30-year history of protecting, connecting, and restoring wildlife habitat and wildlife in the Pacific Northwest. We support ecological restoration across the Okanogan-Wenatchee National Forest, where needed, for forest and watershed resiliency, to provide quality fish and wildlife habitat, and to contribute to community preparedness. We work with managers, scientists, user groups, industry, recreationists and other stakeholders to develop and implement durable restoration plans and projects. It's been our experience that early and often collaboration and community engagement, when conducted with transparency and openness, produces the best results on the ground at the greatest speed.

We have been involved in project level monitoring within the Upper Wenatchee Pilot Project area, including the Natapoc Restoration Project that provided important lessons to the development of the Big and Old Tree Policy and Forest Restoration Strategy. As a Steering Committee and Project Committee member of the North Central Washington Collaborative, our staff was involved in the development of the Chelan County Fire Pilot of which the Upper Wenatchee Pilot Project is a component. We intend to stay engaged through project implementation and monitoring as the planning area is important to our mission. This letter is submitted to complement our collaborative engagement and contributions both verbally and written through that effort.

We strongly support the purpose and need to create a more resilient landscape across four sub-watersheds in the greater Lake Wenatchee area that integrate aquatic and terrestrial restoration activities with human uses and values. This is a highly valued landscape ecologically, culturally, and socially that will benefit from a strategic plan and investment in passive and active management on our national forest lands. The project has a tremendous ability to improve the function of this landscape for a diverse suite of wildlife species today and as wildlife adapt to a changing climate.

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To this end, we are particularly concerned about the important balance that this project needs to strike between protection and active management. There is a need to protect the existing habitat that is providing necessary habitat for vulnerable species like spotted owl, while simultaneously taking action to reduce the risk from uncharacteristic wildfires to adjacent homes and to this late successional habitat as well as proactively restoring unique habitats and facilitating quicker sustainable owl habitat for the future.

The 60,000 acre Upper Wenatchee Pilot Project involves active management over 15 years in Late-Successional Reserves, Riparian Reserves, spotted owl critical habitat, spotted owl nesting/roosting/foraging habitat, North Cascades Grizzly Bear Recovery Zone, wolverine habitat, Inventoried Roadless Areas, and other important and sensitive habitat. The project area also supports or provides habitat for Canada lynx, wolf, fisher, mountain goat, mule deer, elk, an array of woodpeckers, and many species associated with late-successional and old-growth forest habitat.

Condition-based Management

Actions proposed in the EA are to occur under an experimental condition-based management approach which does not provide sufficient information on the direct, indirect and cumulative effects, nor a “hard look” under NEPA, to understand and evaluate impacts of the proposed action from road construction, timber harvest, and other management activities. The scale and complexity of the project, combined with the sensitive resources and potential for significant impact indicate an Environmental Impact Statement will be required. We believe it is prudent and necessary to identify specific areas and locations where roads, restoration, and other actions will occur in order to disclose how potential trade-offs between values, e.g. uncharacteristic fire risk and wildlife habitat, will be weighed and determined. This is particularly important in Reserves, IRAs, critical habitat, and other sensitive areas.

The EA proposes that “limited treatments could occur outside the mapped treatment areas presented in this analysis...While the extent of this activity is unknown, it would be small in comparison to the planned activities.” This appears to indicate that actions will occur outside of the analysis area which could have environmental impacts that will not be disclosed under the idea that is not necessary as they are smaller than the totality of all impacts. It’s difficult to see how this approach aligns with NEPA intent and requirements.

Late-Successional Reserves

Late-successional Reserves are managed to protect and enhance conditions of late-successional and old-growth forest ecosystems, which serve as habitat for late-successional and old-growth forest species, including northern spotted owl. Reserves are designed to maintain a functional, interacting, late-successional and old-growth forest ecosystem.

It is not clear how the actions proposed in the EA meet this purpose. Where uncharacteristic fire risk is a concern, silvicultural activities “shall focus on younger stands.” When risk of large scale disturbance is particularly high, logging activities in older stands may be considered if the proposed actions are clearly needed, result in a greater assurance of long-term maintenance of habitat, and do not prevent the Late-Successional Reserves from meeting ecological objectives.



The EA does not discuss or evaluate whether fire risk is particularly high, and whether or how logging activities in older stands align with the NFWP criteria and protect and enhance old forest habitat. It must.

Since the NFWP's 80 year standard only applies to westside LSRs, it does not appear that a NFWP amendment is needed.

Riparian Reserves and aquatic restoration

We strongly support the Okanogan-Wenatchee Restoration Strategy as a scientifically-sound approach for restoring ecological resilience of forests and watersheds, especially as climate change bears down. We appreciate the project focus on aquatic restoration, including the project's watershed goals and actions to improve aquatic and riparian habitat by removing roads and reducing their impacts. We strongly support actions that remove 65 road miles through decommissioning, close 14 road miles, reduce sediment impacts, and improve aquatic habitat connectivity by removing barriers.

The EA, however, does not provide sufficient information to justify or explain treatments in Riparian Reserves, and how proposals align with direction in the Northwest Forest Plan, Aquatic Conservation Strategy and ACS objectives. The lack of detail on existing conditions, and definition of ecological purpose and need must be addressed before actions may be considered in Reserves. At this point, we recommend avoiding treatment activities within Riparian Reserves.

Large and old trees

Old trees of any species older than 150 years of age or defined by old tree characteristics should be retained on site. Large and old trees are lacking across the Okanogan-Wenatchee, are more resilient to natural disturbances like fire, and provide important ecological functions when alive and as snags and down wood.

Large trees are defined as 20-25" dbh and very large trees are greater than 25" dbh in the Forest's Restoration Strategy. In contrast, the EA describes large trees as 25" or greater, indicating that large trees 20-25" dbh will not be retained. We ask that the EA protect trees over 20" dbh, except for rare, specified, and well-documented ecological or public safety reasons. In those conditions, the down tree should remain on site.

Old forest habitat

The project anticipates impacts to many species associated with older forest habitat. Alternative 2 retains more functional habitat overall, and mostly protects habitat within spotted owl home range. For these reasons, a modified Alternative 2 is a better option. Still, almost a fifth of the acres (that is, 6,000 acres) proposed for treatment in Alternative 2 are high quality spotted owl habitat (nearly a third in Alternative 1) that will be clearcut, thinned, or converted into fuel breaks. Even more logging is proposed in owl dispersal habitat. The EA does not sufficiently explain how these activities will benefit spotted owls or old forest habitat and associated wildlife.

We recommend modifying Alternative 2 to retain all Nesting/Roosting/Foraging habitat where it exists, and focus restoration treatments in non-habitat adjacent to NRF habitat. This will benefit



spotted owls, northern goshawk, fisher, and a myriad of other species that depend on old forest habitat. The EA will benefit from additional analysis on the location, scale and intensity of treatments in non-habitat within the LSR and outside the LSR that could reduce risk to NRF and other spotted owl habitat.

In addition, modeling by DNR shows areas that have the highest potential for maintaining old forest habitat on the landscape into the future. This information should be reviewed to identify areas where treatments may not be a priority at this time.

Please include a map of spotted owl habitat showing different habitat types, and priorities for owl habitat conservation in the planning area.

Roadless Areas

The EA does not provide sufficient information about the potential for impacts on Inventoried Roadless Areas (IRAs) and how proposed actions are consistent with the Roadless Area Conservation Rule. The EA vaguely describes non-commercial treatments with IRAs, but does not show the location of the IRAs, where proposed treatments with the IRA are located, and describe the types of tree cutting that may occur. If actions are to occur within IRAs, this information, including the ecological rationale for actions, will need to be disclosed in the EA.

Road Construction and Decommissioning

The EA provides scant information about the potential impacts of building 42 miles of new temporary roads. There is information about the location of temporary roads in grizzly bear and wolf habitat, but no map or analysis of road construction on or around the significant amount of soils with “severe erosion hazard” in the planning area. To disclose impacts of temporary roads, they should be mapped and impacts identified and evaluated.

We do not support converting ML1 roads to motorized trails, as the Forest is required to complete a Travel Management Plan to study and identify forest road usage. Until that process has been completed, it is premature to add motorized trails and contrary to the project’s restoration objectives.

Shaded fuel breaks

Management outcomes from proposed fuel breaks is not clearly described in the EA. It is unclear how shaded fuel breaks interface with landscape scale treatments that will already modify fire behavior and accomplish the same objectives as fuel breaks. In general, landscape treatments function better than linear fuel breaks, and remove the need for fuel breaks in those treatment areas. Different types or sizes of fuel breaks are identified, but when would one be used, and when the other? For what reasons? Are they really needed in the eastern boundary of the project area where wildfires have occurred recently? How do shaded fuel breaks differ from wildland-urban interface fuel breaks in terms of prescriptions and prioritization? How will fire breaks be maintained over time? Locations and sizes of each must be depicted on maps, and trade-offs of effectiveness and appropriateness and habitat impacts disclosed. In general, we discourage fire breaks as they are ineffective except under certain rare and unusual weather conditions, and encourage actions that support characteristic fire behavior over large landscapes.



Botany and unique vegetation

The attention to white-bark pine is great, especially given its decline and ecological importance. We also appreciate consideration of meadows, aspen stands, and huckleberry patches. However, an ecological rationale for any actions in these areas should be better defined.

Prescribed fire

We appreciate the proposal's focus on returning fire to the landscape.

Monitoring and adaptive management

As described in the Forest's restoration strategy and NWFP, monitoring is critical to the success of restoration projects, but is hardly mentioned in the EA. There remains a need for a comprehensive implementation and effectiveness monitoring plan, including descriptions of how to stage or phase project actions within spotted owl habitat, Reserves, and other sensitive habitat, and impacts of fragmentation and patch size. In addition, more specific metrics are needed, such as minimum and maximum treatment acres by sub-watershed. A broad total of maximum treatment acres is not specific enough for meaningful monitoring. It also does not consider the specific departures by watershed, which are variable. A minimum is needed to help determine if or when key objectives have been attained.

We also recommend phasing the project by geographic area. This would allow opportunities for adaptive management and learning at each stage and applying those lessons to the next phase, and allow for a site specific approach to management of sensitive habitat.

Comment period

Given the size and complexity of the project, we believe a longer comment period would improve the quality and value of public input. Please extend the comment period for another 30 days.

Thanks for the opportunity to provide comment.

Sincerely,

Dave Werntz
Science and Conservation Director
Conservation Northwest