



VIA Email: <https://www.fs.usda.gov/project/?project=58517>

March 23, 2022

Aaron Stockton, District Ranger
Naches Ranger District
10237 Hwy 12
Naches, WA 98937

Dear Aaron:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide comments Draft EA comments on the Little Naches Upland Restoration Project.

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.

The Naches Ranger District is proposing an upland forest restoration project to conduct vegetation and aquatic restoration treatments including thinning, piling and burning, road decommissioning, and improving fish passage within the 40,820-acre Little Naches Upland Restoration project area. The project is located in the headwaters of the Little Naches River, and includes commercial harvest on Matrix lands, non-commercial thinning on LSR lands, pile burning in posttreatment units, and road decommissioning in Inventoried Roadless Area (IRA). Commercial harvest is proposed in matrix and non-commercial thinning is proposed for overly dense stands in LSR and matrix. Pile burning is proposed to reduce hazardous fuels post-treatment. Legacy roads in an IRA adjacent to proposed treatment areas will be decommissioned. There are no activities proposed on private land within the project area.

AFRC provided scoping comments on September 16, 2020, which will be referenced in this document and well as the responses to our comments that are included in the Draft EA.

AFRC continues to support the Purpose and Need for this project which includes:

- Restore plant and wildlife habitat.
 - Improving conditions for special vegetative habitats, such as huckleberry patches
 - Maintaining and improving habitat for species of concern Reduce tree density in stands exhibiting closed canopy stem exclusion and in plantations.
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 - Promoting a change in species composition, reducing stand densities, and trending towards historic conditions in moist and mixed conifer stands.
 - Provide diverse and complex forest structures for associated wildlife habitats.
- Provide jobs and associated economic benefits to the local community.
 - Maintaining critical infrastructure and workforce for the wood products industry.
 - Supporting local economies and businesses.
 - Offsetting the management costs of non-commercial thinning.
 - Harvesting timber sustainably, providing for a future timber base.

AFRC supports Alternative 2. AFRC and our members participate in the Little Naches Working Group (LNWG) which is also reviewing the Draft EA documents. From those meetings, we know how important implementing beneficial treatments and needed restoration work across the landscape is to many stakeholders. From our perspective it appears that we have unanimous support from the collaborative for this Project to move forward.

As you develop your final Plan for treating the Little Naches landscape, we offer these suggestions that we believe will strengthen the Project.

1. In our scoping comment letter, we noted that the commercial units are scattered through the north portion of the Project area with the southern part of the Project area being LSR and receiving non-commercial stand improvement treatments because of previous harvest schedules. There is a lot of post-harvest restoration scheduled for the uplands and headwater streams in the Project area. To fund this restoration work, AFRC believes it would be prudent to look for other commercial harvest opportunities in the matrix lands whether it means treating more acres or harvesting more volume per acre. Specifically, it appears the stands on the north side of Fawn Creek, the north side of Alder Creek, both sides of the south fork of the Little Naches River, and much of the Mathew Creek drainage in the northwest side of the Project area presents additional management opportunities. AFRC requested that the District revisit those locations and the stand exam information to see if more commercial work could be done in those areas.

AFRC appreciates you addressing our comments by your statement in the Draft EA: *Extensive field reconnaissance and GIS mapping exercises were conducted in the Little Naches Upland project area to identify areas where commercial and non-commercial treatments could be implemented. Timber stands not in riparian reserves, NSO suitable habitat, or IRA are being considered for treatment. Factors such as road access and economic feasibility are considered to determine treatment stands and method.*

While no more commercial timber harvest acres were added to the Project from scoping to the Draft EA, we believe there are opportunities where more timber volume could be harvested which will also improve the economic viability of the Project. This will be discussed later in our comments.

With additional projects being planned on the Naches and Cle Elum Districts we want to emphasize that AFRC has several members that depend on timber from the Okanogan-Wenatchee National Forest for their raw material needs. The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. Studies have found that between 12-15 jobs are created with every million board feet of timber that is harvested.

Additionally, the Forest has outlined a considerable amount of service work that needs to be done following harvest. This work can only be completed if the commercial treatments generate sufficient receipts. By offering more timber for harvest, the Forest will receive more revenue to accomplish the restoration work as outlined.

Our members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. This supply is important for present day needs but also important for needs in the future. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of particular importance is how those treatments effect the long-term sustainability of the timber resources on Forest Service managed land. AFRC has voiced our concerns many times regarding the long-term sustainability of the timber supply on Forest Service land and how the current management paradigm is affecting this supply. Lands designated as Matrix are the only lands where our members can depend on a sustainable supply of timber products, as timber outputs on lands designated as reserves are merely a “byproduct.” Therefore, the matrix lands on this project are very important to our members.

2. We want to also discuss the importance of timber harvest as it relates to the amount of stumpage value generated and retained receipts collected. The Little Crow Project recently completed on the Naches District generated three timber sales. Those sales generated over a million dollars in K-V monies or retained receipts. These receipts have been very important to getting needed precommercial thinning, aquatics improvements, road decommissioning, and other needed work accomplished. The District should learn from the success of these sales and try to implement a similar Project with Little Naches. All members of the collaborative have an interest in improving the various resources. By making the Little Naches economically positive, more critical work will be implemented.

3. In our scoping comments we stated that the primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EA's and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Okanogan-Wenatchee market area with a variety of skills and equipment. Developing an EA and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators.

The District is proposing up to 400 acres be harvested using skyline logging and 768 acres using ground-based equipment. AFRC would like to see flexibility in the EA and contract to allow a variety of equipment to operate in the sale area, some of which could be ground based that could operate on steeper slopes. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposal area is planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest. Tethered-assist equipment is also becoming a more viable and available option for felling and yarding on steep slopes. This equipment has shown to contribute little additional ground disturbance when compared to traditional cable systems. Please prepare your future NEPA analysis documents and contracts in a manner that will facilitate this type of equipment.

4. We want to call attention to the economic analysis and subsequent information found on table 12 listed below. We want to combine this analysis with two other points addressed in our scoping comments—which were the use of DxP for harvest tree selection and our belief that thinnings should be designed to retain 40 sq. ft. of basal area per acre.

Table 12 Economic efficiency analysis

	Proposed Action
Timber Volume (MBF) ⁴	9,300
Total Acres	1,168
Volume (MBF)/Acre	8.0
Total Present Value Benefits	
Gross Benefits – Delivered Log Value	\$3,990,115
Total Present Value Costs	
FS Prep & Admin	\$125,848
Logging/Hauling	\$2,720,745
Slash Disposal	\$98,242
Road Work (Reconstruction & Maintenance)	\$282,000

	Proposed Action
Erosion control	\$21,256
Restoration Activities potentially funded by stumpage	\$350,137
Total Cost	\$3,598,228
Cost/MBF	\$387
Cost/Acre	\$3,080
Net Present Value	\$391,887
Stumpage (2021 dollars)	\$924,978
Predicted Stumpage Price/MBF	\$99.46
Potential Return to the Treasury ⁵	\$323,742
B/C Ratio ⁶	1.11

AFRC is pleased to see that the Project might yield 9.3 mmbf, however, we believe more volume could be generated. With only the 9.3 mmbf, the economic analysis above shows that the Project can be cash positive with a return to the Treasury of \$323,742. However, as stated in the document this does not cover all of the non-commercial thinning work planned on 6,852 acres. AFRC supports the fact that the District has increased the amount of precommercial thinning from scoping to the Draft EA. The IDT is now proposing 4,300 acres of non-commercial thinning in LSR, with another 2,500 acres in matrix and acquired lands. If all of this restoration cost were to be included, we believe the Project would be negative regarding returns to the treasury.

Additionally, as listed in the Draft EA, the Forest is proposing: *treatments in both the commercial harvest and non-commercial treatment units have been designed to retain a minimum average canopy cover of 40% after treatment. A combination of 24.9" DBH diameter cap for trees to be cut and the listing of priority tree species to retain in the DXP prescription will result in a residual stand comprised of different age classes and species composition.*

AFRC strongly supports the use of DxP which should help to reduce timber sale layout costs. Secondly, we strongly encourage the District to retain less than 40% crown closure where appropriate to both reduce the risk of wildfire and enhance the vigor of residual trees. As noted in our scoping comments, we suggest thinning down to 40 sq. ft. of basal area which should increase the volume per acre, reduce logging costs, increase the stumpage returns, and meet the desired forest health end results.

5. AFRC continues to urge the District to actively manage riparian reserves where appropriate. Currently, there are 14 acres of riparian reserve in these units where trees may be thinned and removed but ground based logging/yarding equipment will not operate in the corresponding riparian reserve buffers. Trees within these units may be felled or tipped over with attached root wads. Trees removed with attached root wads are most beneficial for stream restoration. Thinned trees would be removed with log forwarders and logging trucks, stockpiled, and made available for instream restoration projects. AFRC supports these tree placements in the streams, but we question if that kind of work can be done to enhance in-stream habitat, why can't commercial thinning in the riparian reserve be done to enhance forest and riparian health?

The document outlines how *"Streams and other water features are essential to the survival and lifecycle of many fish and wildlife species. Restoration of the Little Naches watershed is vital to maintaining and enhancing the Forest experience for all."* AFRC strongly encourages the Forest to actively manage the riparian areas to remove some of the fuel loading and reduce densities. Recent large wildfires have shown that some of the most severe burns and resource damage have occurred in the riparian areas where the fuel loads are the highest. Creating openings in the riparian areas also allows more sunlight to enter which can enhance other vegetation and insect production for a variety of species that depend on them for food.

It has been documented by many that most of the wood that naturally recruits to streams comes from within the first 65 feet of the stream channel (Murphy and Koski, 1989; McDade et al. 1990. Johnson et al. 2011). So if this is where the LWD is coming from then thinning in this region would likely accelerate its creation. We encourage the Forest to design riparian thinning treatments on this project in ways that foster positive changes to large wood supplies that would result in measurable changes. One way to accomplish this is to reduce the size of no-cut buffers. It has also been documented that vegetated buffers that are greater than 33 feet in width have been shown to be effective at trapping and storing sediment (Rashin et al. 2006). Partial cutting down to one or two conifers from intermittent and perennial stream channels would accelerate the recruitment of LWD with minimal impacts to sedimentation and stream temperature. We would like the Forest Service to consider these trade-offs closely in the planning for this project to improve riparian conditions on the maximum amount of these reserves.

We would also like the Forest to consider including some of the following pieces of scientific research into their analysis. Much controversy surrounding any type of thinning in riparian reserves has surfaced, and we think the following information would be useful in justifying the kinds of beneficial treatments the Forest implements.

Stream temperature

Janisch, Jack E, Wondzell, Steven M., Ehinger, William J. 2012. Headwater stream temperature: Interpreting response after logging, with and without riparian buffers, Washington, USA. *Forest Ecology and Management*, 270, 302313.

Key points of the Janisch paper include:

- The amount of canopy cover retained in the riparian buffer was not a strong explanatory variable to stream temperature.
- Very small headwater streams may be fundamentally different than many larger streams because factors other than shade from the overstory tree canopy can have sufficient influence on stream temperature.

Riparian reserve gaps

Warren, Dana R., Keeton, William S., Bechtold, Heather A., Rosi-Marshall, Emma J. 2013. Comparing streambed light availability and canopy cover in streams with old growth versus early-mature riparian forests in western Oregon. *Aquatic Sciences* 75:547558.

Key points of the Warren paper include:

- Canopy gaps were particularly important in creating variable light within and between reaches.
- Reaches with complex old growth riparian forests had frequent canopy gaps which led to greater stream light availability compared to adjacent reaches with simpler second-growth riparian forests.

Small Functional Wood

Nearly all wood that falls into stream channels has the capacity to influence habitat and aquatic communities (Dolloff and Warren, 2003). Therefore, smaller woody material that enters stream channels is important to overall channel function because it can store sediment and organic material, contribute nutrients, and provide temporary pool habitat and slow-water refugia. It is important to note, however, that pools formed by smaller wood generally are not as deep or complex as those formed by large wood. In addition, small wood does not persist for long periods of time because it deteriorates quickly and is more likely to be flushed from the system (Naiman *et al.*, 2002, Keim *et al.*, 2002).

In smaller streams adjacent to previously harvested stands, field surveys (McEnroe, 2010) indicated that relatively large amounts of existing (in-stream) and potential (standing) small functional wood are present. Field surveys also indicate that the vast majority of the down wood in these areas originated from within 50 feet of the stream channel. This is consistent with findings by Minor (1997), who found that in second growth coniferous riparian forests, 70-84 percent of the total in-stream wood was recruited from within 15 meters (49 feet) of the channel. In addition, McDade *et al.* (1990) and Welty *et al.* (2002) found that 80 percent and 90 percent, respectively, of the wood loading occurred within 20 meters (66 feet) of the stream channel in coniferous forests.

The links to the studies mentioned above are listed below for reference.

Janisch paper on stream temps:

<https://www.sciencedirect.com/science/article/abs/pii/S0378112711007821>

Dana Warren paper on light into the stream beds:

https://www.researchgate.net/publication/311850456_Long-term_effects_of_riparian_forest_harvest_on_light_in_Pacific_Northwest_USA_streams

Julie Burton Paper on headwater widths and wood recruitment:

<https://www.semanticscholar.org/paper/Effects-of-riparian-buffer-width-onwoodloading-in-Burton-Olson/13c41421e2b6bf5eca847c4fb557235f3411127f>

Edward Rashin article on Effectiveness of timber harvest practices for controlling sediment related water quality impacts:

<https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1752-1688.2006.tb05303.x>

6. Since all of the commercial harvest will be done in the matrix lands, AFRC encourages the Forest to use treatments that can successfully regenerate stands of mature timber. Deferral of any kind of regeneration harvest over the past three decades has resulted in an unbalanced age-class distribution across the Forest, particularly on the Matrix allocation, and has left a void in stands in the 0-20 year age class. This void concerns AFRC and raises the question of where future timber products off the Forest Service will come from. Regeneration harvests will also support and develop huckleberry plants which is one of the Purpose and Need for the Project. We are supportive of the thinning prescriptions that are being proposed on this project as a piece of a larger management model built to ensure a sustainable timber supply; however, by itself, a thinning only regime is ultimately unsustainable. In areas where thinning is used, again we encourage the District to thin to a 40 sq.ft. basal area to promote tree vigor and for needed fuels reduction.
7. There are 7.3 miles of ML1 and ML2 roads and 0.9 miles of unauthorized road, primarily located in IRA, proposed to be decommissioned and hydrologically stabilized. The objective of road decommissioning is to return unneeded road segments to a more natural forested state restoring hydrologic conditions, soil productivity, and aquatic organism passage. The document also suggests *“The first best solution for rehabilitating watersheds is decommissioning roads. The sediment delivered from degrading roads, both system and non-system roads, continually impairs nearby streams with silt and soil during rain events and spring melt. The roads proposed for decommissioning in the Little Naches Upland Restoration project are found in an Inventoried Roadless Area adjacent to proposed commercial harvest units.”*

While AFRC agrees that there is a lot of work needed in the IRA's and other areas of the Project area for road decommissioning, we would like to remind the Forest that an intact road system is critical to the management of Forest Service land, particularly for the provision of timber products in the matrix lands. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an

economical manner. The land base covered in the LNURP area are to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us. For roads to be decommissioned in the IRAs those road miles being decommissioned should be done by use of barriers or blockage of the road entrances.

AFRC generally does not support obliteration or recontouring roads that are to be decommissioned because of the high cost involved, unless those roads are not needed for future management and also pose a significant risk to critical resources.

Furthermore, there are alternative methods to mitigating potential resource damage caused by poorly designed or poorly maintain roads aside from full decommissioning. Removing or replacing ineffective culverts, installing waterbars, and blocking access are all activities that can mitigate resource damage while maintaining useful roads on the landscape for future use. Please consider these methods as an alternative to full decommissioning.

AFRC believes that a significant factor contributing to increased fire activity in the region is the decreasing road access to our federal lands. Recent fires include the Table Mountain fire in 2012, the Carlton Complex fire in 2014, The NorthStar fire in 2015, the Norse Peak fire in 2017, the Cougar Creek fire in 2018, and the recent Schneider Springs fire in 2021. This factor is often overshadowed by both climate change and fuels accumulation when the topic of wildfire is discussed in public forums. However, we believe that a deteriorating road infrastructure has also significantly contributed to recent spikes in wildfires. This deterioration has been a result of both reduced funding for road maintenance and the federal agency's subsequent direction to reduce their overall road networks to align with this reduced funding. The outcome is a forested landscape that is increasingly inaccessible to fire suppression agencies due to road decommissioning and/or road abandonment. This inaccessibility complicates and delays the ability of firefighters to attack nascent fires quickly and directly. On the other hand, an intact and well-maintained road system would facilitate a scenario where firefighters can rapidly access fires and initiate direct attack in a more safe and effective manner.

If the Forest Service proposes to decommission, abandon, or obliterate road segments from the Little Naches Upland planning area we would like to see the analysis consider potential adverse impacts to fire suppression efforts due to the reduced access caused by the reduction in the road network. We believe that this road network reduction would decrease access to wildland areas and hamper opportunities for firefighters to quickly respond and suppress fires. On the other hand, additional and improved roads will enable firefighters quicker and safer access to suppress any fires that are ignited.

We would like the Naches District to carefully consider the following three factors when deciding to decommission any road in the project area:

- Determination of any potential resource risk related to a road segment.
- Determination of the access value provided by a road segment.

- Determination of whether the resource risk outweighs the access value (for timber management and other resource needs).

We believe that only those road segments where resource risk outweighs access value should be considered for decommissioning.

8. AFRC supports the concept of shaded fuel breaks along strategic roads within the project area. These fuel breaks should be wide enough to stop or slow down a fast-moving wildfire. At a minimum, these breaks should be 300 feet wide on either side of those roads. The stands within those fuel breaks should be thinned to a wide spacing and low basal area to reduce the threat of a crown fire going through the area. The purpose of the fuel breaks is to get the fire to lay down on the ground for suppression purposes. The recent Schneider Springs fire provides a lesson that shaded fuel breaks are effective at slowing and/or stopping the spread of wildfires, and to protect those using the roads in the area for ingress or egress, especially those recreating in the area.
9. AFRC also believes carbon and carbon sequestration needs consideration in any analysis. We would like to encourage the Forest to consider several documents related to carbon sequestration and to forest management.

McCauley, Lisa A., Robles, Marcos D., Wooley, Travis, Marshall, Robert M., Kretchun, Alec, Gori, David F. 2019. Large-scale forest restoration stabilizes carbon under climate change in Southwest United States. *Ecological Applications*, 0(0), 2019, e01979.

Key points of the McCauley paper include:

- Modeling scenarios showed early decreases in ecosystem carbon due to initial thinning/prescribed fire treatments, but total ecosystem carbon increased by 9–18% when compared to no harvest by the end of the simulation.
- This modeled scenario of increased carbon storage equated to the removal of carbon emissions from 55,000 to 110,000 passenger vehicles per year until the end of the century.
- Results demonstrated that large-scale forest restoration can increase the potential for carbon storage and stability and those benefits could increase as the pace of restoration accelerates.

We believe that this study supports the notion that timber harvest and fuels reduction practices collectively increase the overall carbon sequestration capability of any given acre of forest land and, in the long term, generate net benefits toward climate change mitigation.

Gray, A. N., T. R. Whittier, and M. E. Harmon. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. *Ecosphere* 7(1):e01224. 10.1002/ecs2.1224

Key points of the Gray paper include:

- Although large trees accumulated C at a faster rate than small trees on an individual basis, their contribution to C accumulation rates was smaller on an area basis, and their importance relative to small trees declined in older stands compared to younger stands.
- Old-growth and large trees are important C stocks, but they play a minor role in additional C accumulation.

We believe that this study supports the notion that, if the role of forests in the fight against climate change is to reduce global greenhouse gasses through maximizing the sequestration of carbon from atmospheric CO₂, then increasing the acreage of young, fast growing small trees is the most prudent management approach.

Gustavsson, L., Madlener, R., Hoen, H.-F., Jungmeier, G., Karjalainen, T., Klöhn, S., ... Spelter, H. (2006). The Role of Wood Material for Greenhouse Gas Mitigation. *Mitigation and Adaptation Strategies for Global Change*, 11(5–6), 1097–1127.

Lippke, B., Oneil, E., Harrison, R., Skog, K., Gustavsson, L., Sathre, R. 2011 Life cycle impacts of forest management and wood utilization on carbon mitigation: knowns and unknowns, *Carbon Management*, 2:3, 303-333.

McKinley, D.C., Ryan, M.G., Birdsey, R.A., Giardina, C.P., Harmon, M.E., Heath, L.S., Houghton, R.A., Jackson, R.B., Morrison, J.F., Murray, B.C., Pataki, D.E., Skog, K.E. 2011. A synthesis of current knowledge on forests and carbon storage in the United States. *Ecological Applications*. 21(6): 1902-1924.

Skog, K.E., McKinley, D.C., Birdsey, R.A., Hines, S.J., Woodall, C.W., Reinhardt, E.D., Vose, J.M. 2014. Chapter 7: Managing Carbon. In: *Climate Change and United States Forests, Advances in Global Change Research* 57 2014; pp. 151-182.

The wood and fiber removed from the forest in this proposed action would be transferred to the wood products sector for a variety of uses, each of which has different effects on carbon (Skog et al. 2014). Carbon can be stored in wood products for a variable length of time, depending on the commodity produced. It can also be burned to produce heat or electrical energy or converted to liquid transportation fuels and chemicals that would otherwise come from fossil fuels. In addition, a substitution effect occurs when wood products are used in place of other products that emit more GHGs in manufacturing, such as concrete and steel (Gustavsson et al. 2006, Lippke et al. 2011, and McKinley et al. 2011). In fact, removing carbon from forests for human use can result in a lower net contribution of GHGs to the atmosphere than if the forest were not managed (McKinley et al. 2011, Bergman et al. 2014, and Skog et al. 2014). The IPCC recognizes wood and fiber as a renewable resource that can provide lasting climate-related mitigation benefits that can increase over time with active management (IPCC 2000). Furthermore, by reducing stand density, the proposed action may also reduce the risk of more severe disturbances, such as insect and disease outbreak and severe wildfires, which may result in lower forest carbon stocks and greater GHG emissions.

Thank you for the opportunity to provide Draft EA comments on the Little Naches Upland Restoration Project. AFRC supports the implementation of Alternative 2. We are also a member of the Little Naches Working Group, and feel this group also supports the Project. We look forward to following this Project through implementation, which will hopefully occur in this fiscal year.

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
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