



July 24, 2022

Forest Supervisor
Objection Reviewing Officer
Okanogan-Wenatchee National Forest
Attn: Appeals and Objection
215 Melody Lane
Wenatchee, Washington 98801

Submitted via <https://www.fs.usda.gov/project/?project=58517>

RE: Sierra Club Objection to Revised Environmental Assessment dated June 2022 (the "Revised EA") on the Little Naches Upland Restoration Project (#58517)

Dear Sir or Madam:

On behalf of the Washington Chapter of the Sierra Club, we appreciate the opportunity to submit our Objection to the Okanogan-Wenatchee National Forest regarding the content of the Little Naches Upland Restoration Revised EA.

Attached hereto as Exhibit A please find a copy of our Comment Letter dated March 28, 2022.

We have reviewed the Revised EA and are offering a number of comments. In general, we find that restoration treatments (commercial thinning, non-commercial thinning, and no thinning) are not well defined in terms of the Land Use Allocations where they intended that they take place. There are other definitional issues as well. We are concerned that the direction of the 1994 Northwest Forest Plan has not been followed per its explicit instructions so that it is fully integrated into its specific and unique plan elements with the existing 1990 Wenatchee National Forest Land and Resource Management Plan.

Our objections to the Revised EA are set out below, referencing by page number the Revised EA and Section Titles of the Revised EA, as well as the relevant page number of our Comment Letter from which our Objections are drawn. We include copies of the relevant Comments which form the basis of our Objections. All of these objections are based on comments in our Comment Letter except where new language and content was provided in the Revised EA in which case our objections are based on the new language as provided under (36 CFR 218.8(d)6).

Please note that all references below, in the quoted sections of the Comment Letter, to the “ROD”, the “NWP” and the “S&G” refer to the 1994 Northwest Forest Plan and the 1994 Standards and Guidelines issued under the 1994 Northwest Forest Plan. In addition, all references below, in the quoted sections of the Comment Letter, to “WNF 1990 LRMP” refer to the 1990 Wenatchee National Forest Land and Resource Management Plan, and all references to “WNF” refer to the Wenatchee National Forest.

See page 2 of the Comment Letter:

“Page 2, Regulatory Framework. *The regulatory framework section needs to be expanded and emphasis added as noted below:*

...

- *Add The Wilderness Act, Public Law 88-577, as Norse Peak Wilderness is within the Project Planning Area*
- *Expand the specific references to NW FP 1994, including but not limited to:*
 - *S&G’s for the NW FP Land Use Allocations (LUA) as documented in ROD for amendments to Forest Service and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl, Standards.*
 - *In particular, see noted ROD and S&G sections and pages:*
 - *Late Successional Reserve (LSR), see S&G pages A-4 through A-7 and C-9 through C-19*
 - *Administratively Withdrawn areas, see S&G pages A-4 and C-29*
 - *Relationship of existing plans (i.e., WNF 1990 LRMP) to NW FP direction, see ROD page 8 and S&G page C-2*
- *S & G’s for existing WNF plans from 1990 apply when they are more restrictive or provide greater benefits to late-successional forests than do NW FP S&G’s (i.e. administratively withdrawn areas).*
- *The EA should also add the **Aquatic Restoration Plan for National Forest Lands Within the Little Naches River Watershed**, dated June 3, 2011.”*

We object to the failure to include these additional regulatory provisions in the Revised EA as these regulatory provisions regulate and govern the management of the subject project area, habitat and features. The reference to specific provisions of the Northwest Forest Plan direction for this sale is particularly applicable since this unique direction applies to most of the area within this project. *In particular, we object that the Wilderness Act was not included as the*

Norse Peak Wilderness is within the Project Planning Area as shown in several of the Revised EA's maps (see page 12, Figure 1 for example).

See Page 2 of our Comment Letter:

“Page 3, Special Area Designations

...

The Maps in Figures 1, 2, 3, 4, 5 need to depict both IRAs so that management actions on the ground can be related IRA boundaries.”

We note that Figure 3 does show both IRAs; however, the Taneum IRA does not appear the same in both Figures 3, 4, and 5 so those maps still need to be corrected. We object that those maps referred to in our Comment Letter were not correctly revised to show the IRAs; being aware of the IRAs' boundary locations are critical for management and protection of the IRA values.

See page 3 and 4 of our Comment Letter:

“Pages 7 & 8, Desired conditions described for NW FP and 1990 LRMP land allocations

...

Please add a paragraph on the Desired Conditions for Inventoried Roadless Areas. *Since the IRA designation has a great influence on allowable actions on the ground, IRA should be added to this section describing desired future conditions.”*

We object to the failure of the Revised EA to include the Desired Conditions for IRAs as described in our Comment Letter.

See page 4 of our Comment Letter:

“Page 8, Table 3, Land Allocations [note: now page 13 in the Revised EA]

“General Comments on Land Allocations: *We urge that the EA be **revised to only utilize the LUAs from the NWFP**. Describing all the separate LUAs for the NW FP and the 1990 WNF LUA is confusing and unnecessary.*

...

- *The Okanogan-Wenatchee NF should produce a set of merged land use allocations and provide ranger district maps for these allocations.*
- *A **revised Table 3 showing only the NWFP** land use allocations would result in a much clearer product.*

- *Continuing to use the WFP descriptors has the potential to confuse both readers and timber companies, as by way of example, the General Forest description under WFP includes under the NWFP both LSR and Matrix for this National Forest. Yet, the rules and restrictions in the EA actually focus on the NWFP LUA only. We would not want someone used to the fact that the descriptor ‘General Forest’ applies to most of the Little Naches, to inadvertently apply the Matrix rules to the LSR since General Forest includes both Matrix and LSR. As the EA provides, the Matrix rules permit cutting up to 24.9” DBH but the LSR rules prescribe cutting only under 7.0” DBH. To misapply the rules would be a most undesirable for LSRs.”*

We object that the above request in the original Comment Letter was not adopted in the revised EA.

Our objection above regarding the **failure to revise Table 3** as requested to show only the NWFP land use allocations applies to the following additional comments in our Comment Letter:

- Page 5 of our Comment Letter:
“Page 9, Figure 1, Wenatchee Forest Land Management and Resource Plan Land Allocations
 - *See our comments above on the need to revise Table 3. Figure 1 & 2 maps should be **replaced by a single map** showing merged land use allocations as noted above.”*
- Page 5 of our Comment Letter:
“Page 10, Figure 2, Northwest Forest Plan Land Allocations
 - *See our comments above on Table 3. Figure 1 & 2 maps should be replaced by a single map showing merged land use allocations as noted above.”*

See page 6 of our Comment Letter:

“Page 15-16 Table 5 (note: This is now Table 3 on page 13 in the Revised EA)

...

*The description on Table 5 [now Table 3] of treatment for Riparian Reserves needs to be revised to show where the 14 [now 27] acres of tree felling in Riparian Reserves would be located, and where the 99 acres of commercial thinning would occur for obtaining **“overstory and small tree thinning for instream wood placement and floodplain restoration”**. As written, it is confusing and suggests that commercial thinning would occur within Riparian Reserves notwithstanding the statement on page 18 [page 17 of the Revised EA] that **“commercial timber harvest units and non-commercial thinning are not proposed within Riparian Reserves”**. ”*

We object that the above Comment was not addressed in the Revised EA as it creates confusion and potentially an inconsistency and violation of Riparian Reserve buffers, as described in the Revised EA and as further objected to below in this Objection Letter.

The following section of this Objection Letter discusses a new Objection, which we raise here in this Objection Letter as it is appropriate in the context of the pagination of the Revised EA. As the reader has observed, we have been addressing our objections in the sequence of the pagination of the Revised EA as modifying the Draft EA.

We include a new Objection due to new language having been added on page 16 of the Revised EA that was not included in the draft EA. Note, we are entitled under 36 CFR 218.8 (d) 6): to comment on such new language:

“6) A statement that demonstrates either the connection between prior specific written comments on the particular proposed project or activity, or **the new information presented after the designated comment opportunities, and the content of the objection.” [emphasis added]**

The new language to which we object is found on page 16 of the Revised EA:

“...for stream restoration using ground-based logging/yarding equipment. Logging/yarding equipment will not operate within 100 feet of streams.”

The original language that was removed said:

“but ground based logging/yarding equipment will not operate in the corresponding riparian reserve buffer.”

The Forest Service has now added a provision permitting logging and yarding equipment as close as 100 feet to streams; that 100 feet distance which is directly contrary to some of the required buffers for Riparian Reserves, under the 1994 Northwest Forest Plan and the 1994 Standards and Guidelines issued under the 1994 NWFP. We object to the new provision on page 16 of the Revised EA. The required buffers as set out in the Revised EA on page 17 in Table 6 require no cut buffers as much as 300 feet distance from each side of fish-bearing streams.

We are not aware of any permitted exception from the required buffers in the 1994 Standards and Guidelines for tree felling to obtain logs for in-stream restoration. Those required buffers are not only for commercial timber harvest but for any felling of trees, and are to protect and attain Aquatic Conservation Strategy objectives. See page C-31 of the 1994 Standards and Guidelines:

“As a general rule, standards and guidelines for Riparian Reserves prohibit or regulate activities in Riparian Reserves that retard or prevent attainment of the Aquatic Conservation Strategy objectives. Watershed analysis and appropriate NEPA compliance is required to change Riparian Reserve boundaries in all watersheds.”

See also page B-9 of the 1994 Standards and Guidelines:

“The Aquatic Conservation Strategy must strive to maintain and restore ecosystem health at watershed and landscape scales to protect habitat for fish and other riparian-dependent species and resources and restore currently degraded habitats.”

If the Forest Service knows of exceptions from the required buffers we would appreciate it if that information was included in the Revised EA.

We now return to our Objections based on comments in our original Comment Letter, and move to our Comment on page 6 regarding the Riparian Reserve discussion on page 18 of the Draft EA [now found at page 17 of the Revised EA].

See page 6 of our Comment Letter:

“Page 18, Riparian Reserves [now page 17 of the Revised EA]

- ...
The reference to the Table for buffers should refer to Table 8 rather than Table 5. Please revise.”

Please note that although the reference to the Table was changed to Table 8, it should instead refer to Table 6.

See page 6 and 7 of our Comment Letter, being a continuation of our Comments on the Revised EA Section on Riparian Reserves (see immediately prior Objection), now on page 17 of the Revised EA:

- ...
“The Buffers described in Table 8 need to be revised to include, as required in the ROD, page 9 and S&G, page C-30, the full, extensive description of buffers as required.
 - *By way of example, copied from the ROD and the S&G:*

*“Fish-bearing streams - Riparian Reserves consist of the stream and the area on each side of the stream extending from the edges of the active stream channel to the top of the inner gorge, or to the outer edges of the 100-year floodplain, or to the outer edges of riparian vegetation, or to a distance equal to the height of two site-potential trees, or 300 feet slope distance (600 feet total, including both sides of the stream channel), **whichever is greatest.**” [emphasis added]*

Please revise Table 8 to include the full, extensive description of buffers as required under the ROD and the S&G.”

We object that the Revised EA does not include, as we requested above in the Comment Letter, the full, extensive description of buffers as required under the 1994 Northwest Forest Plan and the 1994 Standards & Guidelines.

See pages 6 and 7 of our Comment Letter, being a continuation of our comments on the Revised EA Section on Riparian Reserves (see immediately prior Objection), now on page 17 of the Revised EA:

- “We note that the EA suggests, on page 18 that the buffers are governed by USDA 1996, pages V-33-35; USDA 1998, pages V-26-28: USDA 2012 BMPs Plan-3, AqEco-2, and Veg-3, rather than by the ROD page 9 and the S&G page C-30. **Please explain why the USDA memos rather than the ROD and the S&G were utilized in the EA.**”

We object that the Revised EA does not either include, as we requested above in the Comment Letter, an explanation of the rationale for the use of USDA memos, or comply directly with the 1994 Northwest Forest Plan (i.e. the ‘ROD’) and the 1994 Standards & Guidelines (i.e. the ‘S&G’).

See page 9 of our Comment Letter:

“Page 20, Invasive Weed Control [now page 19 of the Revised EA]

The EA states that a fully integrated invasive plant management strategy is intended that includes chemical control utilizing Glyphosate, Aminopyralid, Milestone, and Picloram.

- We are concerned with the use of Glyphosate within 10 feet of streams or standing water, as this is not an adequate or safe buffer. Field application tolerances could easily result in fluid contamination. We strongly suggest the significantly increasing the buffer distance from streams or standing water.
- The Agency should remember that the World Health Organization’s (WHO’s) cancer authorities – the International Agency for Research on Cancer (IARC) – have

determined that glyphosate is “probably carcinogenic to humans.” See https://www.centerforfoodsafety.org/files/glyphosate-faq_64013.pdf”

We object that the Forest Service did not respond to this comment, and we restate the Comment as an Objection. We find it unfortunate that the Forest Service is relying merely on the Forest Service’s Invasive Plant EIS (2017) for an analysis of the effects for all invasive weed treatments, which is likely out of date as its data would have predated the writing of the document.

See page 10 of our Comment Letter:

Generally, regarding road decommissioning and management, we object that the Revised EA did not address our comments on page 10 of our Comment Letter regarding Best Management Practices (“BMP”) for Daylighting of haul routes or BMP for hazard or danger tree removal. There is no reference at all in the Revised EA to daylighting of haul routes. We refer you to page 10 of our Comment Letter:

“Daylighting and Hazard Tree Removal. *The EA does not specifically address BMPs related to daylighting of haul routes or hazard tree removal. In order to limit the impacts of these practices, **BMPs should be prepared and included in the EA, which should include, but are not limited to, the following:***

- *Daylighting should be conducted primarily on open roads, concentrating on ML3 or higher roadways. Trees targeted for daylighting are overhanging deciduous trees that frequently have branch breakage into ditch lines or limit safe transport on the road.*
- *Hazard trees that are leaning toward the road would also be candidates for removal if deemed a safety hazard.*
- *Trees determined to be a hazard must be marked (stump and stem) and the rationale for the hazard determination recorded.*
- *Large diameter trees (DBH of 7 inches or greater in LSRs, and 24.9” DBH in Matrix) would not be removed for any reason, including daylighting, unless deemed to be a hazard. Any and all such trees would be left on site as per the mitigations.”*

See page 10-13 of our Comment Letter:

Pages 43-44, Timber Economics

The Revised EA analyses of the Timber Economics and effects produced by subject project was extensively revised on pages 42-47. We have reviewed this revised information and analyses and are objecting, as permitted under 36 CFR 218.8 (d) 6), to a number of the revised conclusions and new information as set forth below.

Please note that those Comments initially submitted on pages 10-13 of the Comment Letter which were covered satisfactorily by the Revised EA content are not addressed in this Objection Letter. We address below only the content of the Revised EA to which we object.

While additional information was provided in the revised EA, we had requested additional information that was not provided, not only for the timber harvest produced effects, but also for the restoration activities. The additional requested information, as well as our comments, requests and objections on the new analysis in the Revised EA are set forth below:

- The revised EA should have provided an estimate for the share of the three-county area labor economy that is currently supported by the timber industry since the subject project is primarily a timber sale. Our research shows that in 2020 the timber sectors provided 2.6% of the three-county full-time and part-time employment, with Lewis County exhibiting the greatest timber dependence at 8.5% of the total jobs (Data Sources: U.S. Department of Labor. 2021. Bureau of Labor Statistics, Quarterly Census of Employment and Wages, Washington, D.C.).
 - Please add these findings to the final EA.
- We had asked that the EA provide a description of the dynamics of the local economy, particularly its historic performance over time. Our analyses show that timber dependence of the three-county area has declined by about one quarter, with the share of the total employment supplied by timber declining from about 3.6% in 2001 to 2.6% in 2020. During this same period, non-timber employment expanded by about 17%. (Data Sources: U.S. Department of Labor. 2021. Bureau of Labor Statistics, Quarterly Census of Employment and Wages, Washington, D.C.).
 - Please add these findings to the final EA.
- The EA should have been revised to provide long-term aggregated employment projections to give an indication of what the future may hold economically for this three-county region. Our research shows the total employment (timber and non-timber) for the regions that contain these three counties of interest might be expected

to shrink between 2019-2024 by 0.71-0.79% annually and then expand annually by 0.92-1.07% between 2024-2029. During this 10-year period the timber industry sector was expected to remain stable or decline slightly. (Data source: Washington Employment Security Department/LMEA).

- Please add these findings to the final EA.

Page 45 - 47, Economic Impact Analysis

- The revised EA attempted to address the issue of inconsistency between project implementation timing (EA, page 24) and the economic effects analysis (EA pages 45-47). However, the documented implementation timing for the project is much longer for both timber harvest and restoration activity than the period of time apparently used to estimate the economic response. The result of this inconsistency is to produce employment responses that are substantially inflated over the most likely responses that may occur. We Object to the inclusion of the incorrect employment responses.
- **Quoted from our Comment Letter at page 12:**
 - *“The EA states that the timber sale and the restoration activities, together, would produce 151 direct and indirect jobs. We have several comments on these job creation figures provided in the EA:”*
- The revised EA re-estimated the total employment response from the subject project (EA page 46-47). However, we object to the fact that the resultant discussion was not clear on several points:
 - does the 54-job figure provided included the total employment response over the life of the project for the (1) timber harvest activity and the (2) restoration activity?
 - Or does the figure of 54 include the response for a single year?
 - In addition, the 151-job figure does not appear in the revised EA. What is the employment effect of the restoration activity?
 - Please clarify the applicability of the 54-job figure as to the time frame it applies to and if it includes both timber harvest effects and restoration effects.
- **Quoted from our Comment Letter at page 12:**

“Does this estimate include the induced effects that were referenced earlier in the economic discussion associated with the timber harvest? The EA does not define over what period of time these 151 jobs are to be created. It is unclear how the job

multipliers for the restoration activities were established. The EA should provide the source material and methodology that was used to produce these job multipliers for restoration activity as well as the timber cutting.”

- While the revised EA provided references on sources of employment multipliers (revised EA page 42) the EA did not specify the values for those multipliers, consequently, making the EA economic analysis difficult to follow. Specifically, the revised EA did not provide the job multiplier for the induced effects.
 - We object to the incomplete nature of the economic analyses and request that the EA specify the individual job multipliers for the direct, indirect, and induced employment effects (listed separately) for the timber harvest annually.
 - We object to the apparent incomplete nature of the EA analyses and request that a separate analysis be included to evaluate the direct, indirect, and induced employment effects for the restoration activity, including the individual job multipliers as was requested above for the timber harvest. These employment effects should be provided for the annual employment effect for each year the project is active.
 - Please provide the requested data in the final EA.
- We object to the methodology used to estimate the employment effects of the timber sale on the timber sector jobs. The revised EA per Table 2 (page 46) states that the change in jobs was 54 from direct and indirect effects and is based upon an annual sell volume of 4.52 MMBF.
 - Please clarify if the 54 job figure includes induced effects?
- We object to the revised EA conclusion when it states that 33% of the direct jobs would occur in the timber sectors (forestry, restoration, logging, and milling) and 67% in indirect and induced jobs. Our estimate, using the Mason/Lippke multipliers and the table 2 sell volume (revised EA page 46), would annually produce about 39 jobs (8.67×4.52) in the *direct timber sectors* and 14 (2.62×4.52) jobs in the induced sectors.
 - Consequently, most of the timber harvest produced jobs would be direct jobs in the timber sector. Please clarify.

The revised EA methodology appears to be incorrect when it concludes that more indirect and induced jobs will be produced from the timber sale than

direct jobs. The employment response will be a direct function of the magnitude of the value of the multipliers (direct vs indirect, induced). Please clarify.

- Without providing the full set of multipliers that include direct, indirect, and induced effects, the total effect is unclear on what the job total could be for all activities associated with this timber sale.
- Since the quoted sell volume is 4.52 MBF and the commercial volume produced by this sale is 9.3 MMBF (Table 1, page 44), the revised analyses states that the harvest will take place over a two-year period (revised EA page 46). However, the Revised EA (page 24) states that timber harvest will take place over a 3.5-year period.
- We object to this fundamental analytical inconsistency and request that the EA be further revised to provide an economic impacts assessment for the scheduled time of the project. Otherwise, the estimated employment effects would be inflated. Please adjust the analyses.

In summary, the EA should be revised to estimate economic impacts on an annual average basis that is consistent with the completion schedules documented in this EA for the timber harvest, restoration, road work, and any other relevant activities that produce an economic response. These assumptions should be brought into alignment with the analyses, otherwise the employment and personal income responses may be inflated beyond what is actually experienced.

As a consequence of these flaws, the EA maybe an unreliable source for estimating economic benefits of this project by local economies.

See page 13 of our Comment Letter:

“Page 54, Landings and skid-trails

- *The EA States that “Timber harvest temporarily reduces forest cover and decreases interception and transpiration of atmospheric moisture (USDA Forest Service, 2010). Effects on soil erosion and water yields vary according to precipitation regime, amount of canopy removal, and underlying soil compaction. Logging as authorized in this EA that results in increased spring runoff is unlikely to be helpful to fish restoration in the Yakima Basin. **The EA should be revised to quantify the expected increase and timing of water yield and its effects due to the proposed "commercial and non-commercial thinning" in order to ensure that damage to fisheries is limited to the greatest degree possible.**”*

We object that no changes were made to this Section of the Revised EA as we requested. These revisions are critical for protection of fisheries.

See page 13 of our Comment Letter:

“Page 59, Fisheries and Aquatics

*We are strongly supportive of the goals and objectives of Aquatic Restoration Plan for National Forest Lands Within the Little Naches River Watershed (dated June 3, 2011). It is extremely important that restoration actions that improve salmon spawning habitat are undertaken in an aggressive and comprehensive fashion. However, we note that the EA apparently falls short the Aquatic Restoration Plan in the area of road decommissioning. The pilot Minimum Road Analysis (MRA), at least partially incorporated into the Aquatic Restoration Plan of 2011 (Figure 3, page 6), appears to show more road decommissioning than the proposed action of the EA. **Please explain how the proposed action of the EA supports the full implementation of the Aquatic Restoration Plan of 2011.**”*

We object that no changes were made to this Section of the Revised EA as we requested. These revisions are critical for protection of fisheries and the attainment of Aquatic Conservation Strategy objectives under the 1994 Northwest Forest Plan.

We appreciate the opportunity to comment on this important federal action. Please keep us informed about next steps in the planning process and do keep us on the mailing list for any follow-on actions.

Amy L Mower
Nete Olsen
Donald Parks
Members WA Chapter National Forest Committee
Sierra Club
(425) 891-2025

EXHIBIT A

COPY OF MARCH 28, 2022
COMMENT LETTER
FROM THE SIERRA CLUB, WA CHAPTER



SIERRA CLUB
WASHINGTON STATE

March 28, 2022

District Ranger, Naches Ranger District
Okanogan-Wenatchee National Forest
10237 Hwy 12
Naches, WA. 98937

RE: Sierra Club comments on Little Naches Upland Restoration (#58517), draft
Environmental Assessment, dated February 2022

Dear Sir or Madam:

On behalf of the Washington Chapter of the Sierra Club, we appreciate the opportunity to submit comments to Okanogan-Wenatchee National Forest regarding the content of the Little Naches Upland Restoration draft EA.

The Washington State Chapter of the Sierra Club includes over 100,000 members and supporters, working to protect communities and the planet. With over 3.5 million members nationally, the Sierra Club has the largest membership of all environmental public advocacy groups in the United States. We are the oldest engaged and enduring grassroots organization in the United States.

Members of the Washington Chapter have had a long history of working to protect federal lands within the Okanogan-Wenatchee NF dating back to the North Cascades Act of 1968. More recently, we submitted comments on RARE I and II studies during the 1970's. As a follow on to the North Cascades Study of 1965, we participated in the Wilderness Study of the Naches-Tieton-White River Land Use Study of the late 1970's.

We have reviewed the EA and are offering a number of comments. In general, we find that restoration treatments (commercial thinning, non-commercial thinning, and no thinning) are not well defined in terms of the Land Use Allocations where they intended that they take place. There are other definitional issues as well. We are concerned that the direction of the NW Forest Plan has not been followed per its explicit instructions as to the incorporation of existing plan elements (1990 WNF) into those specific and unique plan elements of the NW FP.

Please find our detailed comments on the subject EA below:

References are to Feb 2022 Draft EA (described here in as the 'EA') in page numbers and Section Titles Page 2, Regulatory Framework. The regulatory framework section needs to be expanded and emphasis added as noted below:

- Add the Roadless rule, 36CFR Part 294
- Add The Wilderness Act, Public Law 88-577
- Expand the specific references to NW FP 1994, including but not limited to:
 - S&G's for the NW FP Land Use Allocations (LUA) as documented in ROD for amendments to Forest Service and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl, Standards.
 - In particular, see noted ROD and S&G sections and pages:
 - Late Successional Reserve (LSR), see S&G pages A-4 through A-7 and C-9 through C-19
 - Administratively Withdrawn areas, see S&G pages A-4 and C-29
 - Relationship of existing plans (i.e., WNF 1990 LRMP) to NW FP direction, see ROD page 8 and S&G page C-2
 - S & G's for existing WNF plans from 1990 apply when they are more restrictive or provide greater benefits to late-successional forests than do NW FP S&G's (i.e. administratively withdrawn areas).
- The EA should also add the *Aquatic Restoration Plan for National Forest Lands Within the Little Naches River Watershed*, dated June 3, 2011.

Please revise accordingly.

Page 3, Special Area Designations

- Relevant portions of Roadless Rule, 36 CFR Part 294, should be added to the text of this EA:
 - From the Roadless Area Conservation FEIS, dated November 2000, page ES-1: *"The Forest Service has the responsibility for resource use and conservation of all NFS lands. The public has expressed great interest in the conservation of roadless areas, and in recent years, roadless area management has been a major point of conflict in the adoption of land management plans on many forests and grasslands. Given the many benefits provided by these areas and the history of controversy surrounding their management, The Agency has determined that there is a need for national rulemaking to conserve roadless areas."*
- Considering the importance of the conservation of roadless areas and their impact on land management, we are surprised that the subject EA, has downplayed if not almost overlooked, the significance of roadless areas and their role as a development consideration associated with this restoration plan.
- Inventoried roadless areas (IRA) need to be:
 - depicted on all EA maps describing the planning area;
 - listed in the regulatory framework; and
 - more fully described in both the 'special area designations' as well as documented in the desired future conditions' of each planning area LUA.

Please revise accordingly.

- The EA needs to define all specific actions and their locations to be taken in this restoration project that “maintain or improve roadless area characteristics” as defined in the Rule. The Responsible Official is expected to fully disclose any such activities.

Please revise accordingly.

- Any exceptions to the Roadless Rule must be fully disclosed. **Please revise accordingly.**
- The EA should restate the purpose of Roadless Rule, with emphasis on the prevention activities that threaten inventoried roadless area characteristics (see Roadless Area Conservation FEIS, page 1-17) including but not limited to:
 - The construction and reconstruction of roads (see FEIS page 2-7)
 - The prohibition of timber harvest except for stewardship purposes (see FEIS page 2-7). If any timber harvest within in any IRA of the planning area is intended, such action must be fully described and accompanied by the rationale for how this activity “maintains or improves roadless area characteristics.”

Please revise accordingly.

- The Maps in Figures 1, 2, 3, 4, 5 need to depict both IRAs so that management actions on the ground can be related IRA boundaries. **Please revise accordingly.**

Page 4, Need to Restore Landscape Resilience

Please revise as follows:

- All commercial thinning operations need to be clearly depicted on relevant maps.
- All commercial thinning needs to be spelled out for each LUA, including LSRs, administratively withdrawn areas (ST-1 and ST-2), IRAs, and Matrix.

Page 5, Need to Restore Hydrological Function to Improve Soil Productivity.....

- Forest system roads have no function in IRAs. No system roads belong in IRAs and certainly no user built and unauthorized roads! We strongly support the removal of these roads.
- The EA should disclose how these roads were located and/or built within IRAs.

Please make that revision.

Page 6, Existing Landscape

The EA discusses “millions of acres burned in the West during the 2020 and 2021 fire seasons”. We urge that this EA should instead focus on the fire history of the actual planning area and immediately adjacent areas. **Please make those revisions.**

Page 6, Table 2 OWNF acres burned by decade.

The EA Table 2 **should be revised** to include an area burned table that describes the only the acres burned on the Naches, Tieton, and Cle Elum Ranger District areas, and separating these acres burned the wet and dry portions of the forest.

Pages 7 & 8, Desired conditions described for NW FP and 1990 LRMP land allocations

- Late-Successional Reserves: We agree with the EA's statement of desired conditions for LSRs.
- Matrix and General Forest:
 - The EA summarizes the 1994 S&G desired condition that most of the timber harvests would be conducted in matrix. Since this statement was written we have observed that most of the log volumes removed at least on the Mt Baker-Snoqualmie National Forest have not been from matrix, but from LSR stands less than 80 years old. This EA should be revised to summarize which LUA's on Okanogan-Wenatchee National Forest have produced most of the log volumes removed. **Please make those revisions.**

Please add a paragraph on the Desired Conditions for Inventoried Roadless Areas. Since the IRA designation has a great influence on allowable actions on the ground, IRA should be added to this section describing desired future conditions.

Page 8, Table 3, Land Allocations

- **General Comments on Land Allocations:** We urge that the EA be **revised to only utilize the LUAs from the NWFP**. Describing all the separate LUAs for the NW FP and the 1990 WNF LUA is confusing and unnecessary.
 - Other forests such as the Mt Baker-Snoqualmie NF have produced maps that show "merged land use allocations" for both the NW FP LUA's and the 1990 MBSNF LUA's in a single map.
 - The Okanogan-Wenatchee NF should produce a set of merged land use allocations and provide ranger district maps for these allocations.
 - A **revised Table 3 showing only the NWFP** land use allocations would result in a much clearer product.
 - Continuing to use the WFP descriptors has the potential to confuse both readers and timber companies, as by way of example, the General Forest description under WFP includes under the NWFP both LSR and Matrix for this National Forest. Yet, the rules and restrictions in the EA actually focus on the NWFP LUA only. We would not want someone used to the fact that the descriptor 'General Forest' applies to most of the Little Naches, to inadvertently apply the Matrix rules to the LSR since General Forest includes both Matrix and LSR. As the EA provides, the Matrix rules permit cutting up to 24.9" DBH but the LSR rules prescribe cutting only under 7.0" DBH. To misapply the rules would be a most undesirable for LSRs.
- **Specific Comments on Table 3:**
 - Table 3 needs additional detail so as to clearly define the acreage of each LUA that has been allocated for both, if any, commercial and non-commercial thinning.
 - The Table 3 also needs to show the acreage, by LUA, that are not being treated.

- The layout of Table 3 should be revised so that it is clear that the LUAs under the NWFP column are not meant to be equivalent to the LUAs under the WFP column. That said, if the Table 3 only shows the NWFP LUAs, then this comment is not necessary.
 - By way of example, Table 3 suggests that the WFP LUA for ST-1 falls into the Administratively Withdrawn (AW) category of the NW FP. Since timber harvest is scheduled for this WFP LUA, it is unclear if ST-1 should be considered as AW. We believe this LUA should be defined as matrix.
- Since there are no acres of AMA, WI, CW or unloaded motorized in the planning area, these entries should be deleted from Table 3.
- Since there is an area of Managed Late Successional Reserve shown on the NWFP map, the acreage should be included in Table 3.

Please revised Table 3 accordingly with all of these suggestions.

- The EA **should explain** why SI-2 meets the requirements of a “special interest area”.
 - We note also that the SI-2 LUA on the WFP Map has larger acreage than the Administratively Withdrawn LUA on the NWFP Map, and **request explanation.**
- **SI-2 should be defined on Maps for Figures 1,2,3,4, and 5.**

Page 9, Figure 1, Wenatchee Forest Land Management and Resource Plan Land Allocations

- See our comments above on Table 3. Figure 1 & 2 maps should be **replaced by a single map** showing merged land use allocations as noted above.
- If Figure 1 is not revised as requested, **it should be revised to show all IRA parcels.**

Page 10, Figure 2, Northwest Forest Plan Land Allocations

- See our comments above on Table 3. Figure 1 & 2 maps should be replaced by a single map showing merged land use allocations as noted above.
- If Figure 2 is not revised as requested, it should be revised to show all IRA parcels.

Page 15, Alternative 2-Proposed Action

- We agree with the EA statement that trees older than 120 years should not be logged in the Matrix.
- The EA must spell out the area of non-commercial thinning that is applied within LSR stands. **Please revise accordingly.**
- The EA must disclose if any tree cutting or removals are planned within any of the IRA parcels. We are strongly opposed to any tree removals in the IRAs. **Please revise accordingly.**

Pages 15-16, Changes to the proposed Action after Scoping

- We are opposed to the 100% increase of non-commercial thinning acreage that occurred after scoping. The EA must disclose site specific reasons and rationale for such a large increase in logging in such a sensitive LUA. **Please revise accordingly.**

Page 15-16 Table 5

The figures given in Table 5 are inconsistent with statement in a prior paragraph that non-commercial thinning was increased to 7,000 acres and most of this increase was in LSR LUA. However, the total non-commercial thinning (applied to trees less than 7 inches in diameter) area total (6852 acres) includes Nature Conservancy (TNC) lands. Where is the additional 148 acres of non-commercial thinning? **Please clarify and add that information to Table 5.**

- All the treatment types, both non-commercial and commercial, must be disclosed on Table 5 for each LUA that is entered. **Please revise accordingly.**
- The description on Table 5 of treatment for Riparian Reserves needs to be revised to show where the 14 acres of tree felling in Riparian Reserves would be located, and where the 99 acres of commercial thinning would occur for obtaining “*overstory and small tree thinning for instream wood placement and floodplain restoration*”. As written, it is confusing and suggests that commercial thinning would occur within Riparian Reserves notwithstanding the statement on page 18 that “*commercial timber harvest units and non-commercial thinning are not proposed within Riparian Reserves*”.
Please revise accordingly.
- Table 5 needs to clearly state which LUA’s are to be commercially thinned on 1168 acres that are called out. If any of these commercially thinned acres are within the LSR, **the EA must be revised** to disclose this fact.
- The EA needs to state if the upper diameter limit of 24.9” DBH is intended to apply to any LSR acres. **Please clarify.**

Page 18, Riparian Reserves

- The EA clearly states that “commercial timber harvest units and noncommercial thinning areas are not proposed within riparian reserves.” However, Table 5 on page 16 then calls for “overstory and small tree thinning for instream wood placement and floodplain restoration (included in commercial thinning acres).” We are confused about the planned actions within riparian reserves and if they include commercial thinning. **Please revise the EA to clarify.**
- The reference to the Table for buffers should refer to Table 8 rather than Table 5.
Please revise.
- The Buffers described in Table 8 need to be revised to include, as required in the ROD, page 9 and S&G, page C-30, the full, extensive description of buffers as required.
 - By way of example, copied from the ROD and the S&G:

*“Fish-bearing streams - Riparian Reserves consist of the stream and the area on each side of the stream extending from the edges of the active stream channel to the top of the inner gorge, or to the outer edges of the 100-year floodplain, or to the outer edges of riparian vegetation, or to a distance equal to the height of two site-potential trees, or 300 feet slope distance (600 feet total, including both sides of the stream channel), **whichever is greatest.**” [emphasis added]*

Please revise Table 8 to include the full, extensive description of buffers as required under the ROD and the S&G.

- We note that the EA suggests, on page 18 that the buffers are governed by USDA 1996, pages V-33-35; USDA 1998, pages V-26-28; USDA 2012 BMPs Plan-3, AqEco-2, and Veg-3, rather than by the ROD page 9 and the S&G page C-30. **Please explain why the USDA memos rather than the ROD and the S&G were utilized in the EA.**

Page 18, Other Un-thinned areas

- The EA states in this subsection *“In addition to un-thinned areas associated with riparian reserves, areas would be added to meet levels specified for matrix.”* This is a confusing statement. Does this mean that treatments will be applied to additional riparian areas beyond the 14 acres specified in the EA (Table 5)? Does this mean that treatments that are specified for matrix will also be applied to riparian reserves? If the latter is true, then will the requirements of the desired future condition for riparian reserve areas be met? **Please clarify.**
- The EA states *“These un-thinned areas may be combinations of ¼ acre skips or larger areas. Biological hotspots, unique habitats, or areas of existing late successional or old growth legacy structure (e.g. large down logs and snags) would be incorporated into un-thinned areas.”* **Please clarify** the intent of this prescription.

Page 18, Logging Systems, Temporary Roads, Landings, and Log Hauling

- The EA is unclear as to which LUA the commercial treatments will be applicable to. **Please provide that description.**

Page 19, Commercial Thinning

We note that the EA sets the maximum DBH for trees to be cut in the Matrix at 24.9” DBH. We ask that the following language be added:
“trees larger than 24.9” DBH will not be cut” **Please revise the EA accordingly.**

Page 20, Non-commercial Thinning

- The EA states the following on page 20:

*“Non-commercial thinning of **small trees less than seven inches DBH (emphasis added)**, which have no commercial value as wood products, is proposed on 6,852 acres of old logging units that have naturally seeded in or been planted and are currently overstocked”*

However, on Table 5 on page 15 of the EA, the DBH description for non-commercial thinning is “less than **or equal to**” 7 inches. **Please correct this inconsistency and list all LUAs by area that are to be non-commercially thinned.**

- **Please add to page 20 the following language:**
 - “The determination of 7” DBH be made at the time of actual cutting”.
- **Please clarify that the 6,852 acres for non-commercial treatment includes the TNC acreage of 1,392 acres. As written, the language suggests that the TNC acreage is in addition to the 6,852 acres, which is contrary to Table 5 on page 15 which shows that FS acreage for non-commercial treatment is 5,460 acres.**
- **Please revise the EA to provide additional detail that describes more fully the TNC lands, such as stand age.** The reader cannot tell if the TNC lands are in the same condition as the FS lands that are proposed for non-commercial treatment or if there are other conditions of the TNC lands which should be protected.
 -
 - **If the TNC acreage does not mirror the FS acreage in LSR, then the treatment should be changed accordingly. If the TNC acreage trees include trees larger than 7” DBH, they must not be cut and** should be managed in accordance with the NW FP LSR S&G’s.
- Even though “no large trees or snags” are present per page 6 of the EA, there is no definition of “large” trees. Since the EA permits commercial treatment in Matrix, and cutting up to 24.9” DBH, we are concerned that there are trees in LSR that exceed the EA’s cap of 7” DBH cutting in LSR. Please ensure that no large trees are cut within the LSR.
 - Recall that “*Leaving the largest, fastest growing trees improves the potential for them to become large, and old trees, or large snags and downed logs...*” (page 6 of the EA) is one of the Desired Conditions under the EA.
 - Therefore, we ask that the **EA be revised to affirmatively:**
 - **prohibit cutting trees above 7” DBH in LSR.**
 - Further, we ask that the EA be revised to specify that the determination of 7” DBH be made at the time of cutting.

Page 20, Invasive Weed Control

The EA states that a fully integrated invasive plant management strategy is intended that includes chemical control utilizing Glyphosate, Aminopyralid, Milestone, and Picloram.

- We are concerned with the use of Glyphosate within 10 feet of streams or standing water, as this is not an adequate or safe buffer. Field application tolerances could easily result in fluid contamination. We strongly suggest the significantly increasing the buffer distance from streams or standing water.
- The Agency should remember that the World Health Organization's (WHO's) cancer authorities – the International Agency for Research on Cancer (IARC) – have determined that glyphosate is “probably carcinogenic to humans.” See https://www.centerforfoodsafety.org/files/glyphosate-faq_64013.pdf

Pages 21 - 24, Road Work to Forest Service System Roads **Road decommissioning**

We are highly supportive of the decision to decommission 7.3 miles of ML1 and ML2 roads, as well as the permanent closure and decommissioning of 0.89 miles of unauthorized road. Closing and effectively decommissioning roads is the surest way to decrease sediment transfer to downstream waterways, thereby improving the aquatic health of the watershed. Additionally, removal of roads improves the connectivity of the landscape for wildlife, as undisturbed areas become more interconnected. We are supportive of maximizing opportunities to decommission roads.

A “Stand Age Map” should be prepared for this project to review where additional road closure opportunities present themselves within the project area.

- The ages of the stands being treated within this project are between 25 and 60 years of age.
- The EA predicts that small tree thinning will occur from 2029-2032 (page 25), at which point these stands will be anywhere from 32 to 70 years of age.
- Once these stands are accessed for treatment it can be assumed that no further treatment would be performed on the older stands, at which point these stands should then be considered inaccessible for further entry.
- In these cases, the roads accessing these stands should be decommissioned through this project in order to protect the forest resources, and to hasten the recovery of the stands' ecosystem values.

A “Stand Age Map” would facilitate this review by illustrating which roads access primarily the older stands.

Page 22 Road decommissioning-convert to nonmotorized system trail (FSR 1906):

We are supportive of the closure of FSR 1906 to motorized vehicle access. Conversion of this road to a non-motorized trail must be carefully designed and implemented to prevent unauthorized access of motorized vehicles after the trail conversion is complete. Monitoring and enforcement of this closure must be carried out post-closure to ensure compliance.

Daylighting and Hazard Tree Removal. The EA does not specifically address BMPs related to daylighting of haul routes or hazard tree removal. In order to limit the impacts of these practices, **BMPs should be prepared and included in the EA, which should include, but are not limited to, the following:**

- Daylighting should be conducted primarily on open roads, concentrating on ML3 or higher roadways. Trees targeted for daylighting are overhanging deciduous trees that frequently have branch breakage into ditch lines or limit safe transport on the road.
- Hazard trees that are leaning toward the road would also be candidates for removal if deemed a safety hazard.
- Trees determined to be a hazard must be marked (stump and stem) and the rationale for the hazard determination recorded.
- Large diameter trees (DBH of 7 inches or greater in LSRs, and 24.9" DBH in Matrix) would not be removed for any reason, including daylighting, unless deemed to be a hazard. Any and all such trees would be left on site as per the mitigations.

Page 25, Figure 3, Proposed road actions

- **Please expand Figure 3** to include the entire planning area and show all Inventoried Roadless Areas within the planning area.

Pages 43-44, Timber Economics

- The EA mentions direct, indirect, and induced costs and benefits without describing what these elements relate to. Since nearly all the EA discussion refers to the timber industry, the EA should point out the direct benefits of timber harvest relate to the timber industry sectors only (logging, forestry, wood products manufacturing, and paper manufacturing). The indirect benefits relate to economic sectors that in part support the timber industry but are not solely dependent upon the timber sector. The induced effects are those that are the farthest removed from the timber sector, such as eating establishments, grocery stores, retail sales, etc. **The EA needs to clarify these relationships.**
- The EA mentions impacts to the general economy without providing any sense of the magnitude of the total employment or total personal income associated with the "analysis area." The EA fails to address the dynamics of these metrics, i.e., how they have changed historically or what the future prognostications might be. **Please provide contextual information on the importance of the proposed action for the "analysis area."**

- The EA states it will assess the effects of the EA activities on Yakima, Kittitas, and Lewis Counties. However, no economic information is provided that allows any assessment of economic benefits or costs to these counties.
 - Our analyses show that in 2020 total full-time and part-time employment in the three counties of the analysis area totaled 190,500 jobs (See US Dept of Commerce, Bureau of economic Analysis, see <https://apps.bea.gov/iTable/iTable.cfm?reqid=70&step=1&acrdn=6>). **The EA should be revised to include a numerical assessment of the importance of the proposed action to “analysis area.”**
 - Our analyses show that The total full-time and part-time employment in these three counties has expanded by some 68,700 jobs since 1984 (See WNF FEIS dated 1990, page III-136), when the Wenatchee Forest Plan prepared its economic assessment of the Forest’s economic influence zone (See US Dept of Commerce, Bureau of economic Analysis, see <https://apps.bea.gov/iTable/iTable.cfm?reqid=70&step=1&acrdn=6>).
- While the EA lists the full capacity of the YFP mill, it does not provide information on the other mills and processing facilities in the “analysis area.” The EA should be revised to:
 - provide timber supply for all ownerships for the three noted counties of the “analysis area.”
 - to provide total production capacity for currently operating mills in the three noted counties of the “analysis area.”
 - to provide information on the total labor economy of the three counties as well as estimate for the timber sector employment of the “analysis area.”
- The EA assumes that potential purchasers for this restoration “range from” Lewis County in southwest Washington to Union County in northeastern Oregon. The EA should include the economic metrics associated with for all the counties where bidders originate that may participate in this sale.

Page 44, Economic Efficiency analysis

- Ecosystem services are mentioned then promptly ignored “due to the difficulty to quantify ecosystem services.” The agency needs to learn how to account for these benefits and estimate these benefits for both this EA and any future analyses. In Table 12, Economic efficiency analysis data for the timber volume associated with this sale must be estimated for each LUA from which logs are extracted. We also request that Table 12 also define the “total acres” associated with each LUA where the 9.3 mmbf of logs originates. We are particularly interested in the log volume removed from within Riparian Reserves are to be commercially thinned.
- The EA needs to assess the context for what this timber volume (9.3 mmbf) means to the local timber supply of the counties in the “analysis area.”

Page 46, Economic Impact Analysis

- The timber sector has never been a relatively large component of the total labor economies of Central WA (Chelan, Kittitas, Yakima, and Klickitat Counties). It is

noted that the importance of timber has slipped in recent decades. The trends are similar for the three counties in the “analysis area.” In the late 1990’s timber sectors generated about 6% of all private sector wage and salaried jobs in the “analysis area.” This timber contribution has declined by 2019 to about half of its prior value. See Headwaters Economics EPS data, <https://headwaterseconomics.org/apps/economic-profile-system/>

- When considering the estimated labor economy contribution for this proposed timber sale if the logs produced by this sale were all processed in the “analysis area” and were processed in a single year, our analyses show that based upon the timber-based employment response noted in this EA, the three-county contribution would represent about 0.06% (112/190,500) of total full-time and part-time employment for one year. The EA does not define over what period of time these 112 jobs are to be created.
- The EA states that the sale will generate “112 forestry industry jobs.” This statement is misleading and partially incorrect. The multiplication factor quoted includes direct, indirect, and induced effects. As noted earlier in our response, the indirect effects and induced effects do not occur within timber industry sectors. Only the direct effects are timber sector related. A more accurate multiplier for direct and indirect effects can be found in the WA DNR’s 2019 Marbled Murrelet Long Term Conservation Strategy, FEIS page 3-71 & 3-72 where multiplication factors for direct and indirect employment responses from timber operations were:
 - “Mason and Lippke (2007) found that direct employment resulting from both the harvesting and processing of 1 million board feet of timber in Washington State is equal to 8.67 full time jobs. *These jobs were divided between logging jobs, mill jobs, and wood product manufacturers.*” [emphasis added]
 - Indirect multiplier was estimated to be 2.62 jobs per mmbf cut.
 - See Table 3.11.9, pages 3-71 and 3-72 of the WA DNR’s 2019 Marbled Murrelet Long Term Conservation Strategy, FEIS for greater detail on multipliers.
- The EA states that the timber sale and the restoration activities, together, would produce 151 direct and indirect jobs. We have several comments on these job creation figures provided in the EA:
 - Does this estimate include the induced effects that were referenced earlier in the economic discussion associated with the timber harvest? The EA does not define over what period of time these 151 jobs are to be created. It is unclear how the job multipliers for the restoration activities were established. The EA should provide the source material and methodology that was used to produce these job multipliers for restoration activity as well as the timber cutting.
 - The EA states that the direct jobs would increase the average income since wages in logging and milling produce higher paying jobs. We disagree that this sale will result in any measurable change in ‘average income’ in either the timber sector or the total labor economy because the incremental increase in jobs generated by this EA make up such a small share of the total employment in either sector. Our analyses estimate direct timber jobs generated by this sale would be about 81 jobs (8.67 X 9.3) for one year. This figure represents

about 2% (81/3800) of the estimated direct timber employment (full-time and part-time employment) in the analysis area, hardly sufficient to raise the average pay per job for one year. The 151 jobs represent about 0.07% (151/190,500) of total employment in the analysis area for one year. This share certainly would not move the average wage needle.

- The EA is misleading about the relationship of the implementation timing for the processing of the 9.3 mmbf of logs and the related restoration activity as these items relate to the stated economic impacts to the labor economy of the “analysis area.” The economic contribution would certainly be less on an annual basis if removals were spread over time as the EA states they will be. The EA states that Implementation Timing (page 25) for the commercial harvest and all road work will take 3.5 years or more to complete. This implementation timing will significantly reduce the annual average economic impacts that are strongly implied for this proposed action.
- The EA should be revised to estimate economic impacts on an annual average basis per the estimated completion schedule of this project.
- **Please revise the EA to incorporate the information and statistics discussed above regarding pages 43 – 46 of the EA.**

Page 54, Landings and skid-trails

- The EA States that “Timber harvest temporarily reduces forest cover and decreases interception and transpiration of atmospheric moisture (USDA Forest Service, 2010). Effects on soil erosion and water yields vary according to precipitation regime, amount of canopy removal, and underlying soil compaction. “
 - Logging as authorized in this EA that results in increased spring runoff is unlikely to be helpful to fish restoration in the Yakima Basin. **The EA should be revised to quantify the expected increase and timing of water yield and its effects due to the proposed "commercial and non-commercial thinning" in order to ensure that damage to fisheries is limited to the greatest degree possible.**

Page 59, Fisheries and Aquatics

We are strongly supportive of the goals and objectives of *Aquatic Restoration Plan for National Forest Lands Within the Little Naches River Watershed* (dated June 3, 2011). It is extremely important that restoration actions that improve salmon spawning habitat are undertaken in an aggressive and comprehensive fashion. However, we note that the EA apparently falls short the Aquatic Restoration Plan in the area of road decommissioning. The pilot Minimum Road Analysis (MRA), at least partially incorporated into the Aquatic Restoration Plan of 2011 (Figure 3, page 6), appears to show more road decommissioning than the proposed action of the EA. **Please explain how the proposed action of the EA supports the full implementation of the Aquatic Restoration Plan of 2011.**

We appreciate the opportunity to comment on this important federal action. Please keep us informed about next steps in the planning process and do keep us on the mailing list for any follow-on actions.

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