



July 27, 2022

Kristin Bail, OOWNF Forest Supervisor

215 Melody Lane, Wenatchee, WA 98801

Re.: Conservation Northwest Objection to the Little Naches Upland Restoration Project Draft Decision

Dear Supervisor Bail,

Conservation Northwest submits the following objection to the U.S. Forest Service's Draft Decision Notice (DN) for the Little Naches Upland Restoration Project as analyzed in the Final Environmental Assessment (EA) with a Draft Decision Notice and Finding of No Significant Impact (FONSI). We believe the DN and FONSI were reached in error pursuant to the Northwest Forest Plan (NWFP), and specifically the Aquatic Conservation Strategy (ACS).

As required, the objector's name, address, and telephone number are below.

Jen Syrowitz, M.Env.

Conservation Program Manager

Conservation Northwest

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Project Name: Little Naches Upland Restoration Project

Responsible Official: Kristin Bail, Forest Supervisor

Location: Naches Ranger District, Okanogan-Wenatchee National Forest

Aspects of the Proposed Project Addressed in this Objection

1. The project has not adequately explained how harvesting trees from Riparian Reserves will achieve Aquatic Conservation Strategy (ACS) objectives in the Riparian Reserves from which the trees are being taken.
2. We object to the harvest of trees >21" DBH without adequate identification of old growth trees.
3. The project has not provided prescriptive side boards that will prevent a majority of large trees (20-24.9" DBH) from being taken to achieve target basal areas.

Conservation Northwest has a 30-year history of successfully leveraging funding and public support to protect, connect, and restore habitat and wildlife in the Pacific Northwest. We represent over 17,000 members and supporters dedicated to conservation and recovery action in our state. Our success is owed in large part to our practical allegiance to science and policy, and commitment to collaboratively work with managers, scientists, user groups, industry and other stakeholders to develop and implement durable restoration plans and projects; this includes our service on several forest collaborative groups across the state.

We support efforts on the Okanogan-Wenatchee National Forest (OWNF) to restore ecological resiliency, watershed function and habitat conditions for wildlife populations at landscape scales. We also recognize the value of tribal and public access for cultural and recreational opportunities. We care deeply about this landscape, its vast wilderness, connected habitat, and wildlife and human populations that it sustains. We submitted Draft EA comments on the Little Naches Upland Restoration Project in March of this year. Although some of our concerns were addressed in the Final EA, we still have concerns about "aquatic restoration tree sourcing" out of Riparian Reserves without an explanation of how this harvest would improve ACS objectives within the Riparian Reserve from which the trees are being taken. We would also like to see identification and monitoring efforts that focus on the protection of mature and old growth trees, and assurances that "thinning through diameter range" (instead of "thinning from below") will not result in the loss of too many large trees (20-24.9" DBH).

We want to emphasize that we recognize the need to thin forest plantations and to support local industry and jobs in the local economy, and that we champion many of the activities in the project and ecological restoration efforts in the Little Naches watershed.

We have provided three categories of concerns, supporting reasons, and corresponding suggested solutions. We will work collaboratively with the OWNF to resolve our objection.

1. Aquatic restoration tree sourcing from Riparian Reserves

We understand there are 27 acres within Riparian Reserve land allocations that may be thinned in support of future instream restoration projects (referred to in different parts of the final EA as “source wood,” “stream restoration tree source units,” “aquatic restoration tree sourcing,” or “fish log units”), and that 300 feet of temporary road will be built within Riparian Reserves to access timber. We question the need to harvest and stockpile instream wood (aka “fish sticks”) from Riparian Reserves.

We note that “trees will be selectively harvested to reduce impacts to stream shade, avoid erosion of streambank soils and sediment delivery to streams, and that BMPs will be implemented if there is concern for sedimentation to stream” (final EA pg. 57). We also note that “...short term degrade of riparian reserves from temporary road construction would be restored in the long term” (final EA pg. 64), but struggle to reconcile this with the NWFP Standards and Guidelines which states under the Riparian Reserves section “Do not use mitigation or planned restoration as a substitute for preventing habitat degradation” (NWFP C-37). Silviculture practice in Riparian Reserves is only acceptable “to control stocking, reestablish and manage stands, and acquire desired vegetation characteristics needed to attain Aquatic Conservation Strategy objectives” (NWFP C-32). A properly functioning Riparian Reserve that provides adequate shade, large woody debris recruitment, habitat connectivity, and refugia for aquatic species will be at least 80% intact ([NMFS and USFWS Matrices of Pathways and Indicators](#)).

Requested Resolution

- Do not source “aquatic restoration trees” from Riparian Reserves, but from more appropriate project areas such as commercial uplands, landing areas (29 ground-based landings and 56 skyline landings proposed), trees felled during road construction, danger trees (estimated between 2 to 5 danger trees per acre will be felled along the haul route), etc.
- If trees will be taken from Riparian Reserves and relocated for in-stream needs elsewhere, please detail the ACS objectives that will be achieved in the harvested Riparian Reserves, and why the trees stockpiled for in-stream work cannot be taken from elsewhere in the project area outside of Riparian Reserves.
- If the project is unable to move these 27 harvest acres out of Riparian Reserves because trees taken from these units will help achieve ACS objectives within the harvested Riparian Reserves, a buffer of 300' (not 100') from fish bearing streams would appear to be required by the NWFP Standards and Guidelines (NWFP C-30). Table 6 on page 17 of the final EA indicates fish bearing streams will have a 300' buffer, but the narrative on pages 16, 59, and 60 states “No disturbance would occur within 100 feet of fish bearing streams during tree thinning for aquatic restoration.” Fifty percent of Unit A is allocated Riparian Reserve and

could be removed from the project. Unit FFF should be harvested only on the north side of the 1900631 ML1 road that divides it, outside of the Riparian Reserve. We note that Unit GGG is on the south side of FR 1906 which creates an additional, beneficial stream buffer. Unit CC-1 does not have this benefit and harvest in this Unit will need to be mindful of sedimentation to fish-bearing Alder Creek.

2. The take of trees >21" DBH without adequate identification of old growth and large mature trees

Primarily due to fire suppression and grazing exclusions, the regeneration and release of shade-tolerant conifers, especially where past logging targeted old pine, Douglas fir, and western larch in dry and moist mixed conifer forests, has resulted in Douglas fir, western hemlock, and grand fir trees that are easily within the size range of large trees over 20 inches, and many of them represent the fuel ladders that threaten current forests (P. Hessburg personal comms. Feb. 16, 2022).

At the same time, we recognize that large mature and old growth trees take a long time to grow, exist in low quantities on the OWNF, and are central to the architecture of the forest's mycorrhizal networks that connect the forest's plants, transferring water, carbon and nutrients, and establishing seedlings. These processes span multiple generations of trees, where large mature trees act as hubs (mother trees) for many younger trees (different aged cohorts) within the forest, maintaining functional continuity within the stand. The loss of too many large mature trees could impair self-regeneration and resilience following disturbance, including harvest, wind, fire, or other forms of disturbance.

We note that, just as not all large trees are old, not all old trees are large. The project proposes that a diameter cap of 24.9" DBH will ensure large and old legacy trees will be retained (final EA pg. 67). We are concerned that a diameter cap above 21" DBH may jeopardize critically valuable old trees less than 24.9" DBH.

It is worthwhile to note that a considerable amount of good NSO habitat on the OWNF is within Matrix lands and, conversely, a fair amount of LSR (now in plantations) is not good NSO habitat. As climate change intensifies, it is especially important that we protect large mature and old growth trees, regardless of their size and location among NWFP land use allocations (LSR or Matrix).

Requested Resolution

- We request that the diameter cap be decreased to 21" DBH to ensure the protection of large mature and old legacy trees.
- If there are a large number of trees greater than 21" DBH within the project area (the LNUR Silviculture report would suggest otherwise) and decreasing the diameter cap would prevent stand densities and spatial patterning that equate to improved ecological resilience, please demonstrate how large mature and old growth trees will be identified and protected. We

suggest that large mature and old growth trees would be better protected using additional morphological characteristics besides DBH (i.e. before the timber sale contract is awarded, the timber/sale prep staff use the Van Pelt (2008) rating system¹ to “score” and flag large mature and old trees during layout, or the harvesters are given a full suite morphological characteristics they can use to identify large mature and old trees during treatment, regardless of DBH. This is especially important when harvesters are using DxP during implementation).

- We request that large mature and old legacy trees be added to the draft Monitoring Plan (final EA, Table 14, p. 74). It could look like this:

Monitoring Item	Monitoring Objective	Metric	Frequency/Duration	Completed by
Old growth and large mature trees	Evaluate if old growth and large mature trees (>120 years) that are <24.9” are being harvested in commercial units	Size and number of old and large mature trees left after commercial harvest	Annually during life of timber sale/harvest activity	Silviculturist, Timber Sale Administrator, Trained Volunteers

3. Thinning through diameter range without percentage of size classes to be removed

The final EA states that “[t]he objective of commercial thinning is thinning through diameter class in favor of early seral species such as DF, western larch, western white pine which are resilient to the effects of fire and better suited to a warming climate... less dense stands dominated by early seral species could reduce [fire] contagion and provide an increase in forage and shrub cover types” (p. 5) and that “[t]he overall reduction in tree density will come from “thinning throughout diameter range” in size classes resulting in complex stand structure of at least three different layers, as well as diversity of species with an emphasis on retaining early seral species. The goal of this treatment is to create a more resilient and adaptable stand by developing an early seral stand condition to initiate the growth of shade intolerant species and provide for a future timber base, leaving the largest trees in the stand. Variable species and spacing are desired and would be incorporated into the designation method. Designation by prescription (DxP) will be used in commercial treatment units” (p. 15).

We value that thinning throughout diameter range may result in a more complex stand structure versus thinning from below which concentrates on the take of smaller diameter trees. However, when harvesting by diameter class to achieve a target basal area (i.e. wet strata to 80-100 sq. ft. basal area; mesic/moist strata to 60-80 sq. ft. basal area), the basal area could be reached, for example, with the take of 10 big trees or 100 smaller trees. To ensure the sale doesn’t simply take big trees to achieve the target basal area, there should be a mechanism that assures the harvest of various diameter class sizes. For example, the prescription could include a percentage of harvest occurring within various diameter ranges.

¹ Van Pelt, R. 2008. Identifying Old Trees and Forests in Eastern Washington. Washington State Department of Natural Resources, Olympia, WA. 166 p.

The project looks to favor shade intolerant/fire tolerant species which may be easier to achieve by thinning through diameter range (i.e. leave the Douglas fir and take the big (not old) western hemlock and Pacific silver fir). A thin from below prescription has greater potential to leave some of the big (not old) western hemlock and Pacific silver fir behind, which is less desirable from a resilience perspective. Nonetheless, a percent of harvest dedicated to various diameter ranges is needed to ensure basal area targets and complex structure are achieved simultaneously.

We'd also like to ensure that the DxP is written with guidance from the ICO Implementation Guide² so that clumps of large mature and old growth trees are persistent within stands. Preliminary monitoring on the OWNF Mission Project, where ICO was not explicit in the DxP, shows a lack of clumps left post-harvest.

Requested Resolution

- Add percent of harvest dedicated to various diameter ranges in the wet and mesic/moist forest types based on stand conditions. For example, in the Pacific silver fir (wet) strata, no more than 20% of trees between 21-24.9" DBH will be removed; approx. 30% of trees between 16-20.9" will be removed; approx. 50% of trees between 7-15.9" DBH will be removed.
- Ensure DxP follows ICO guidelines so that clumps of large mature and old growth trees and their associated ecological communities are persistent within stands.

Improvements made in the Final EA

We would be remiss not to acknowledge some of the improvements made between the draft EA and the final EA including the addition of a draft Monitoring Plan (Table 14), the removal of non-commercial harvest from the IRA, and a more thorough explanation of a "moderate retention regeneration harvest" (i.e. "The proposed treatments would retain 40% canopy cover which is considered a "tending treatment" to the residual stand and not a "regeneration harvest" to establish a new cohort. The residual spatial pattern will be random based on the amount of retained basal area and the spatial distribution and presence of large trees. No specific openings are planned, though smaller opening may occur at landings" (final EA p. 10).

² Churchill, D.J., A.J. Larson, S.M.A. Jeronimo, P.W. Fischer M.C. Dalhgreen, and J.F. Franklin. 2016. The ICO approach to quantifying and restoring forest spatial pattern: Implementation guide. Version 3.0 Stewardship Forestry and Science, Vashon, Washington, USA.



Conclusion

We appreciate your consideration of the information and concerns addressed in this objection. We are supportive of this project's intentions to thin plantations and create improved habitat conditions for a variety of terrestrial and aquatic wildlife. We want to be sure these actions (forest treatments) are consistent with the NWFP and ACS objectives and produce net-gain ecological outcomes in the upper watershed. We ask for open communication, collaboration and involvement and look forward to working towards resolution. We respectfully request to meet with the reviewing officer to discuss these concerns and suggested resolutions. Please do not hesitate to contact us with any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jen Syrowitz'.

Jen Syrowitz, M. Env.
Conservation Program Manager
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Cc: Dave Werntz, M.S., Science and Conservation Director