



VIA Input Portal: <https://cara.fs2c.usda.gov/Public//CommentInput?Project=49124>

January 13, 2023

Objection Reviewing Officer
Kristin Bail, Forest Supervisor
Okanogan-Wenatchee National Forest
USDA Forest Service
215 Melody Lane
Wenatchee, WA 98801

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide a support letter for the Upper Wenatchee Pilot Project (UWPP) which is currently in the Objection Period.

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.

We are writing this letter during the Objection Period not to object to the Project rather to support the Project moving forward to implementation. While we are supportive of the Project, the following comments will also provide some of AFRC's thoughts on how the Project could be improved during implementation under the current management strategy, and for improvements once the Late Seral Reserve Analysis (LSRA) is complete for future treatments. First and foremost, AFRC believes this Project needs to be implemented quickly! The residents in and around Lake Wenatchee have been threatened by wildfire during each of the past five summers, and they deserve the needed fuels reduction treatments for safety.

AFRC has been heavily engaged in the Project since its inception in 2017. AFRC participates in the North Central Washington Forest Health Collaborative (NCWFHC) which was instrumental in helping to solicit funding for the Project. AFRC participated in two field trips to the Project area and submitted scoping comments on March 18, 2019, and Draft EA comments on February 9, 2021. AFRC also participated in the virtual open house on January 20, 2021. Most recently, AFRC participated in several NCWFHC quarterly and Projects Committee and Economical subcommittee meetings which recapped the changes and progress of the UWPP.

The UWPP area is 75,000 acres including 60,000 acres of National Forest lands and is located north of Leavenworth in Chelan County, Washington. The project area encompasses the Lower Chiwawa, Big Meadow, Lake Wenatchee, Beaver Creek-Wenatchee River sub-watersheds. The project is being designed to address how landscapes and watersheds have changed from historical conditions, as well as identifying activities that would make landscapes and watersheds more resilient to disturbances while considering climatic changes.

Below are some comments and recommendations that we hope the Forest will consider as the UWPP moves to implementation.

1. AFRC remains very disappointed that managing this landscape for timber production and maintaining our forest products infrastructure is not included in the Purpose and Need. AFRC has been very vocal since the inception of this project in 2017 that this 60,000-acre landscape has the potential to yield a considerable amount of sawlog volume which is greatly needed by the forest products industry. Below is a table of the potential sawmills and manufacturing facilities that might access timber coming from the UWPP.

Table 3.10-4. Regional Mills

Name	Town/City	County	Minimum Diameter (inches)	Maximum Diameter (inches)	Species
Boise Cascade	Arden	Stevens	6	32	Pine
Boise Cascade	Elgin	Union (Oregon)	6	32	DF
Boise Cascade	Kettle Falls	Stevens	6	32	DF, Pine
Buse Timber	Everett	Snohomish	8	50	DF, H
Canyon Lumber	Everett	Snohomish	12	48	DF
Columbia Cedar	Kettle Falls	Stevens	6	32	Cedar
Fritch Mill	Snohomish	Snohomish	8	32	DF, H, C
Hampton Lumber	Morton	Lewis	5	32	DF
Hampton Lumber	Randle	Lewis	5	32	Pine, Fir
Hampton Lumber	Darrington	Snohomish	5	32	Fir
Manke Lumber	Tacoma	Pierce	6	32	DF, H
Packaging Corps of America	Walla Walla	Walla Walla	2.5	32	Pulp
Sierra Pacific Industries	Shelton	Mason	5	23	DF, H
Sierra Pacific Industries	Mt. Vernon	Skagit	5	31	DF, H
Vaagen Bros.	Colville	Stevens	4.5	14	All but PP
Vaagen Bros.	Colville	Stevens	2.5	20	Pulp
Willis Enterprises - Bullfrog	Cle Elum	Kittitas	2.5	40	Pulp/all species
Woodgrain	Pilot Rock	Umatilla (Oregon)	6	40	PP, DF
Woodgrain	La Grande	Union (Oregon)	6	40	PP, DF
Yakama Forest Products	White Swan	Yakima	6	40	Pine, Fir

2. AFRC supports Alternative 1 and is hopeful that all of the proposed acres in this alternative eventually get treated. Last winter we were disappointed to learn that the Forest Service had disapproved the preliminary Preferred Alternative 1 for the UWPP because it was inconsistent with the requirements of the LSRA. AFRC urges the Forest to finish updating the Okanogan-Wenatchee LSRA as soon as possible.

Alternative 1 will treat the most acres to improve forest health and resiliency which is a key component of the Purpose and Need. Table 2.6-1 illustrates the large economic impact that harvesting as much as 97.4 mmbf could have. It should be noted that Alternative 1 will yield about \$10.3 million in stumpage. Portions of these revenues will go into retained receipts or into K-V for other resource improvements. Members of the NCWFHC have specific restoration projects they would like to see completed with the UWPP and stumpage revenues will help fund many of these projects.

Table 2.6-1. Comparison of Alternatives

Parameter	No Action	Alternative 1	Alternative 2
Project Elements			
Estimated Maximum Acres Treated to Improve Forest Resilience and Health	0	36,900	32,700
Miles of New Shaded Fuel Break	0	54	54
Acres of non-federal land boundary potentially treated	0	3,500	3,500
Acres of non-forest, potential prescribed fire	0	1,040	1,040
Acres of limited or No treatment habitat	0	5,130	9,330
Socioeconomics			
Estimated Total Merchantable Volume (MBF)	0	97,430	81,000
Estimated Total Value of Merchantable Volume (\$M)	0	10.3	8.6
Annual Volume (MBF)	0	6,495	5,400
Estimated Annual Value (\$M)	0	0.7	0.6
Direct Logging Jobs	0	6.8	5.6
Direct Wood Products Manufacturing Jobs	0	6.9	5.8
Indirect Jobs	0	3.5	2.9

3. AFRC strongly supports the use of condition-based management for this Project. Condition-based management is defined as a system of management practices based on implementation of specific design elements from a broader proposed action, where the design elements vary according to a range of on-the-ground conditions to meet intended outcomes. Flexibility during implementation is allowed as part of condition-based management, recognizing that the environment is dynamic and changing as ecosystems respond to natural and human-caused events. In this approach, a suite of potential treatment types and intensities can be aligned, prior to implementation, with current conditions on the ground to move resources toward the desired conditions. AFRC believes that by using condition based NEPA it allows

the planners and District personnel to address the most current forest health and resource needs at the time of implementation rather than years prior during the planning phase. As stated in the Draft EA *“The best available science is considered in preparation of this EA; however, what constitutes best available science might vary over time and across scientific disciplines.”* Since this Project could be active for 10-15 years, the best science should be used at the time of implementation which is why the flexibility of condition-based management is needed.

4. Going forward, AFRC strongly supports the District’s plan to manage in the Late Successional Reserve (LSR) portion of the Project area which covers 38 percent of the acreage. Part of the LSR will be managed to reduce the threat of wildfire while other parts of the LSR will be treated silviculturally to enhance or accelerate the development of large and old trees. Currently the area’s high risk of wildfire and the objective to develop northern spotted owl (NSO) habitat in the most sustainable landscape locations will require active management. Some of these treatments will be put on hold until the LSRA is completed. AFRC also suggests that the Forest categorize ALL of the potential treatments as **risk reduction treatments** to allow for the harvest of trees over 80 years of age.
5. A commonsense approach needs to be used regarding lands set aside or “off-limits” due to NSO habitat concerns. The District has conducted surveys for NSOs across the Project area for two years or more. The results show that where there were once 20 pairs of spotted owls, there are only two non-nesting individuals left. Obviously, the status quo is not working for the NSO. Competition with the barred owl, and loss of habitat to wildfire over the past three decades since the listing of the owl has led to this dire statistic. AFRC believes it will take active management in many of the LSR stands to bring them into a resilient condition that supports their use by NSOs. AFRC supports the goal listed in the Draft EA which states the District needs to *“Reduce tree densities and shift forest stand structure, species composition, and landscape pattern to reduce insects and disease risks and damage to endemic levels.”* Again, AFRC supports Alternative 1 which will conduct landscape treatments designed to move current conditions closer to reference conditions and thus increase landscape resilience to disturbances. Treatments would be more aggressive outside of high-quality habitat and Activity Centers and may remove nesting, roosting, and foraging (NRF) habitat to reduce the risk to other habitats. Habitat within the five highest priority activity centers (those that have had NSO activity in the past 15 years and contain the greatest amount of sustainable NRF) would be prioritized for retention.

Further, AFRC hopes that the updates to the LSRA will allow for better management in these areas and we feel the Forest must quickly adopt them. By using the updated information, additional treatments planned in this EA can be implemented with fewer restrictions that could hamper attainment of the purpose and need.

6. When the Project gets to the implementation phase, the Forest needs to realize that one critical need is to reduce the risk of fire in the Wildland Urban Interface (WUI). Members of NCWFHC that live within the Project area have been emphatic about getting treatments implemented to reduce the risk and spread of wildfire onto their property. On the two tours to the Project area, we looked specifically at the areas that need treatment that about the

National Forests. AFRC believes the Forest needs to carry out heavy thinnings near property boundaries to reduce the risk of fire crossing those boundaries by creating barriers. These heavy thinnings should be carried out by spacing the leave trees far apart reducing the basal area down to 40 sq. ft. or less.

Another critical part of providing safety to the people who live in the WUI are the proposed 54 miles of shaded fuel breaks as discussed in the Draft EA. These shaded fuel breaks would be developed to slow fire movement, reduce the potential for crown fire initiation, protect habitats, and decrease the resistance of control on small and large fires. This would require the modification of forest structures to reduce surface and ladder fuels. Under both Action Alternatives, shaded fuel breaks would be developed to slow fire movement, reduce the potential for crown fire initiation, protect habitats, and decrease the resistance of control on small and large fires. This would require the modification of forest structure to reduce surface and ladder fuels. In general, the objective would be to raise the canopy base height and reduce canopy closure. Residual stand density would be dependent on the existing tree size class and distribution.

While the District is planning to vary the width of the fuel breaks between 100 to 300 feet, AFRC strongly supports a width of 300 ft. AFRC is pleased to see that 300-ft. wide fuel breaks will be planned around non-federal lands to further reduce risk and provide increased firefighter safety, increased defensible space to nonfederal lands, and at-risk communities.

Over the past few years, AFRC and our members have toured Projects where shaded fuel breaks have been used effectively. Below are two pictures of the shaded fuel break put in during the Wolverine fire. This shaded fuel break not only reduced fuels in front of the oncoming wildfire, but also provided good silvicultural prescriptions.



7. Economics of a project are important for the Forest to be able to sell a timber sale to a potential bidder. NCWFHC has an economics subgroup that provides information to the District in hopes that any timber sale moving forward will be economically sound. With that in mind we would like to remind the Forest that there are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland. 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 National Forest market area with a variety of skills and equipment. Developing an EA contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the EA contract to allow a variety of equipment to the sale areas. 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 may be planned for cable harvest, there may be opportunities to use certain ground equipment such as feller-bunchers and processors in the units to make cable yarding more efficient. AFRC supports the District's plan allowing ground-based equipment on slopes up to 45%. Allowing the use of processors and feller-bunchers 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 NEPA analysis documents in a manner that will facilitate this type of equipment.

Finally, AFRC would like the Forest to examine the days that operations and haul are shut down due to hunting seasons and other outdoor recreation. The logging community has a limited operating time at best, and further reductions such as these only makes surviving in the logging business that much more difficult.

8. Approximately 14 percent (10,198 acres) of the Project area is designated as Riparian Reserves. Riparian Reserves include those portions of the watershed where riparian-dependent resources receive primary emphasis, and they overlay all other land allocations. AFRC's scoping and Draft EA comments, stated that we would like to see active management in the riparian areas. We believe there is sound science behind treating in these areas, and we would like the Forest to consider that it has been well documented that thinning in riparian areas accelerates the stand's trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers. Removal of suppressed trees has an insignificant short-term effect on down wood, and ultimately a positive effect on long-term creation of large down woody debris and large in stream wood, which is what provides the real benefit to wildlife and stream health. We encourage the Forest Service to focus their riparian reserve treatments on a variety of native habitats. We encourage the Wenatchee District to look for ways to incorporate treatments that meet those needs. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives should be considered.

The tradeoffs that the Forest Service will likely be considering through the ensuing environmental analysis will be between achieving these forest health benefits and potentially having adverse impacts to streams. These impacts to streams typically include stream temperature, wood recruitment, and sedimentation associated with active management.

AFRC has submitted and referenced several scientific documents related to the benefits of management in the riparian areas and we encourage you to review that literature and design projects that will allow thinnings in those areas.

9. When implementing a timber sale, AFRC suggests the consideration of the use of DxP for any commercial thinnings. We discussed using this approach during several field trips and meetings, and both the Forest Service and purchasers thought it was a viable option. We

believe that better results can be achieved in a much more efficient and cost-effective manner by utilization of basal area thinning. The use of DxP has been tried on some projects on the Tonasket Ranger District with positive results. While the Tonasket District is no longer part of the Okanogan-Wenatchee National Forest, AFRC believes those results are still relevant and should be considered.

10. AFRC would like to reiterate our position on road decommissioning and closures. The Travel Analysis Plan has identified about 65 miles of roads for decommissioning, and about 14 miles of road to be closed (i.e., placed in storage in ML 1 status), for a total net reduction in open road of 78.5 miles. AFRC believes that a significant factor contributing to increased fire activity in the region is the decreasing road access to our federal lands. 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 UWPP 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 fire fighters quicker and safer access to suppress any fires that are ignited.

We would like the 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. Further AFRC is concerned about the decommissioning of roads that access the Matrix lands. These are lands identified to produce timber and access is needed for managing and harvesting of those acres.

11. Finally, while the Forest has a section on climate in the supporting documents, AFRC would like to encourage the Wenatchee District to consider several documents related to carbon

sequestration and related forest management that AFRC submitted in our Draft EA comments. These should be included in the record for not only this Project but for others being developed on the Forest. The studies provide a clear linkage to the value of thinning and the sequestering of carbon and reducing the risk of wildfire that puts tons of CO2 into the atmosphere.

Thank you for the opportunity to provide a letter of support for the implementation of the UWPP. We ask the Forest that if other objections are filed that all objectors meet at one resolution meeting to discuss their issues to see if a path forward can be reached.

Sincerely,

A handwritten signature in cursive script that reads "Tom Partin". The signature is written in black ink and is positioned below the word "Sincerely,".

Tom Partin
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Portland, Oregon 97239