



**October 11, 2023**

**RE: Chumstick to Lower Peshastin Project - Scoping Comments**

To Justin Gelb and whom it may concern,

I am writing on behalf of Conservation Northwest and its supporters to share our concerns and recommendations for the Chumstick to Lower Peshastin (LP) Project. We would like to thank the Wenatchee River Ranger District (WRRD) for the opportunity to provide scoping comments. These comments reflect our opinions for the Chumstick to LP Project, and we include recommendations to alleviate concerns we would like addressed. Only so much can be said in a comment letter, so we look forward to working together with the WRRD on solutions that will balance the purpose and needs of the project with wildlife habitat and forest resilience.

Conservation Northwest is a member of the North Central Washington Forest Health Collaborative (NCWFHC) and wishes to see the U.S. Forest Service (USFS) continue to work with local and relevant stakeholders to meet the needs of wildlife, habitat, and the people that enjoy them. Our organization has a long history of helping implement innovative and creative solutions to complicated natural resource issues, and we see forest restoration as a great opportunity for solutions-based approaches to habitat restoration and multiple-use management.

**Aquatic Restoration**

Aquatic restoration activities are not included in the proposal so we would like to learn how aquatic restoration will be accomplished within the Chumstick to LP Project. Much of the aquatic restoration in this region is accomplished through partnerships with Tribes, NGOs, and other organizations, and the WRRD must begin to apply its aquatic resources to each project. The location of this proposed project will take place in a watershed that is difficult for partners to obtain funding for given an absence of federally-listed fish species from some streams, but the need for aquatic restoration is large given the extent of land and water use history. The Chumstick and Lower Peshastin watersheds flow into the Wenatchee River that is home to several species of at-risk fish, including salmon. The WRRD should use the investment in this landscape to restore conditions for at-risk aquatic species by leveraging the local knowledge of its partners to catalyze greater aquatic restoration actions and build the capacity of WRRD aquatic resources.

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## **Road Network**

The scoping information states that no road system changes would take place in this Project. This is a missed restoration opportunity, since moving equipment is a large part of the logistics and costs to repair, reduce, or maintain road infrastructure. We do not support restoration projects that do not consider and address the impacts of roads. Road system changes impact forest health by shifting where soil will be wet, dry, and erode. Any forest health activity should consider how the existing or future road network impacts a forest in the long-term. Without any road network changes, we are concerned the WRRD is extending the life of failed culverts, insufficient ditching, high road densities, and impactful road locations.

## **Terrestrial Habitat Restoration**

We support size class definitions set by the Okanogan-Wenatchee Forest Restoration Strategy (FRS). We promote these definitions to increase the size and abundance of large and old trees across the landscape. We recommend including clear and consistent language regarding tree size removal in all documents, from the environmental analysis to contracts. We do not generally support removing any stems over 21" DBH in riparian reserves, late-successional reserves (LSR), or in fisher, American marten, white-headed woodpecker, flammulated owl, or northern goshawk habitat. We do not support removing any stems over 25" DBH across the Okanogan-Wenatchee National Forest (OWNF).

We support thinning and burning to reduce fuels and create deliberate openings adjacent to large and old trees within flammulated owl and white-headed woodpecker habitat. Except in locations where closed-canopy habitats are desired or underrepresented, we support implementing the individual, clumps, and openings (ICO) as a leave-tree strategy throughout all terrestrial prescriptions in dry forests. We suggest identifying and even marking some of the largest tree clumps ahead of time, because retaining enough large clumps to meet project objectives has been a challenge in past OWNF projects.

Fuel breaks can impede or help movement for different species, so we recommend including wildlife connectivity as a primary component of assessing fuel break locations and treatments. Maintaining dense fuel loads and high horizontal cover in riparian areas, forested wetlands, and designated corridors will support marten, snowshoe hare, and grouse. We encourage burning where it could benefit bighorn sheep and mountain goat habitat, and we suggest creating fuel breaks in these species' habitats at locations such as Stuart Ridge in Lower Peshastin.

Dead trees and downed wood should be retained around fisher, marten, goshawk, and riparian habitat. If fuel breaks or hazard tree removal are proposed, a DecAID analysis and firewood removal assessment should be performed to evaluate impacts to wildlife. Fuel breaks can retain large snags without compromising the risk of fire spread. Like live trees, the diameters of dead

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and downed woods should be variable with a desire to retain the largest diameters available across the landscape.

Root rot, heart rot, mistletoe, and bark beetle all play significant roles in providing food and shelter to wildlife. We recommend retaining tree diseases and infections that are valuable to wildlife where it is sustainable to do so since these characteristics are common removal targets during dry forest restoration treatments. Sustainable locations include where forest health concerns are underrepresented in the landscape or provide value to at-risk species of wildlife can be identified using the landscape evaluation process. Marking which infected trees will be retained ahead of time can help simplify the prescription language in contracts.

We support and encourage the use of treatments that promote deciduous regrowth, but we recommend that large trees (21+” DBH) do not need to be removed to release deciduous regeneration. Large deciduous trees represent some of the lowest intensity burning trees in a dry forest, and they should be retained while medium and small tree trees are removed, masticated, or burned in order to achieve regeneration goals.

### **Rare and Endemic Plants**

We recommend working with contractors to make sure western white pine can be identified from lodgepole pine since white pine may not be a common species to the project area, community, or contractors. We would like to collaborate on tagging/marketing significant western white pine individuals in stands and would like to plant blister-rust resistant seedlings in appropriate sites. If there could be white-bark pine in addition to western white pine in the project area, then we suggest working with the Region to formulate a strategy to locate, protect, and collect cones from blister-rust resistant/elite trees of this federally threatened species. Funding for fuels reduction could also be applied to reduce wildfire risk to the white-bark pine by thinning out encroaching fir and spruce and burning.

Several rare and endemic species of plants exist within the area, as identified by the state’s Natural Resource Recreation Area in this landscape. We encourage consulting with botany resources dedicated to culturally important and at-risk plant species, and we support burning that could help propagate or maintain those plants. The Camas Meadows area is an example of one extremely fire-excluded area in the Project area with plant species dependent on wildfire.

### **Purpose and Need**

It is unclear whether Chumstick to LP will accomplish the suite of restoration actions we typically support in this landscape because the language in the scoping information is vague. While we understand scoping information is meant to be broad to accept input, we are

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concerned about the lack of details stated in objectives, desired outcomes, and overarching goals. We encourage using more specificity in purpose and need statements, objectives, and proposed actions.

For example, the first purpose is clear and direct about how fire risk will be prioritized and addressed: *“Reduce elevated risks of wildfire to communities who reside within the WUI, while increasing opportunities for effective fire suppression across the project area.”* However, the second purpose, *“Restore forest structure and composition to more sustainable conditions”*, is not clear on what conditions are desired to be sustained. The third purpose, *“Reduce the risk of large-scale habitat loss from severe wildfires”*, does not specify which wildlife are at risk or how the risk will be addressed. From a wildlife resource perspective, the second and third purposes are similar approaches that accomplish the same purpose.

As an example, the second and third purposes could be combined into a single purpose, such as: *“Restore forests and habitat in a spatial and temporal mosaic that resembles historic ranges of variability as well as predicted future ranges of variability.”* This language could provide a more specific idea of how areas will be prioritized for treatment.

## **Emergency Action Decision (EAD) and NEPA Contracting**

We are concerned with the use of an Emergency Action Decision (EAD) and third-party NEPA contracting as a means of expediting projects to implementation. We are interested in hearing how the WRRD benefits from the use of EAD and NEPA contracting. From our perspective, the limited action alternatives associated with an EAD does not provide a range of options for the public, consulting agencies, and stakeholders to give feedback on, which could restrict the solutions that are developed with these partners. The use of a contracted, third-party for NEPA does not appear to increase the pace of projects since WRRD must feed and review the materials used in the NEPA.

## **DxP and CBM**

We are concerned with the use of Description by Prescription (DxP) and condition-based management (CBM) because the independent and conditional decisions associated with implementing these tools could mislead the public about what to expect from treatments. It is unclear to the public and partners how well implementation can meet the objectives of the project if the results of treatments hinge on future, conditional actions. Monitoring will support adaptive management strategies for more effective treatments over time, so we recommend working with the Region, Forest, NCWFHC, and our organization to accomplish thorough monitoring of the effectiveness of DxP and CBM.

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Thank you for the opportunity to comment on this forest project and for taking the time to read our comments. We look forward to working together and learning more information as the Chumstick to LP Project develops.

Sincerely,

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