



State of Washington
DEPARTMENT OF FISH AND WILDLIFE REGION TWO

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October 24, 2023

Okanogan-Wenatchee National Forest
Wenatchee River Ranger District
c/o Erica Taecker, Wenatchee River District Ranger
600 Sherbourne Street
Leavenworth, WA 98826

Dear Erica,

**SUBJECT: WDFW COMMENTS – CHUMSTICK TO LOWER PESHASTIN (LP) PROJECT NEPA
PUBLIC SCOPING**

On September 26, 2023, the Washington Department of Fish and Wildlife (WDFW) received notice from the Okanogan -Wenatchee National Forest Wenatchee River Ranger District that it is accepting comments regarding the proposal referenced above. Thank you for the opportunity to comment on the scope of the Chumstick to Lower Peshastin (LP) Project. The Washington Department of Fish and Wildlife (WDFW) interest in this project is based on our agency's mandate to perpetuate fish, wildlife, and their habitat (RCW 77.04.012).

WDFW supports conducting restoration on the forest to move it towards a more historic range of variability, recognizing that catastrophic fire has played a large role in reshaping habitats over the last decade. We also recognize the project's scale and the prescriptions' overall uniformity need to be carefully evaluated.

Is there any information about the project area which you believe is important in the context of the proposed activities that you would like the Forest Service to consider?

WDFW recommends the Forest Service consider our WDFW Priority Habitat and Species information as part of the scope of the Environmental Assessment. Within the Chumstick to Lower Peshastin Landscape Evaluation Boundary, the following species, and their associated habitats, listed below are known to occur. If the project activities will overlap with the following habitats and/or species, we recommend including this information as part of the scope of the Environmental Assessment.

Intersection of WDFW PHS and USFS Late Successional and Old Growth Species: northern spotted owl, northern goshawk, white-headed woodpecker, fisher, pacific marten, and flammulated owl. For LSR and Old Growth species, we recommend that the scope of the Chumstick to LP Restoration Project consider nesting, roosting, foraging (NRF) and dispersal

habitat in the project vicinity. Please also consider that snags and downed wood requirements should be consistent with species-specific needs. Northern spotted owls, northern goshawks, and pacific marten all utilize the same type of habitat, high-quality late successional forest. Preserving what remains of northern spotted owl NRF habitat would also provide habitat for northern goshawks and pacific marten.

Other WDFW PHS species and habitats located within the Landscape Evaluation boundary to consider include:

Ungulates: mule deer winter range (Beaver Hill), mule deer migration corridors (Maverick Saddle, South Fork Migration), elk breeding (Little Camas, Camas), bighorn sheep regular concentration area, mountain goat (Stuart Ridge)

Wetlands: freshwater emergent, freshwater forested/shrub, freshwater ponds

Other species: golden eagle and giant Palouse earthworm

Riparian Reserves Treatment – If Riparian Reserves will be treated in the project area, WDFW supports thinning and patch clearcutting of smaller conifers to break up fuel continuity and reduce ladder fuels, but we caution against over-reliance on conifers of smaller size classes to provide adequate shade. The total conifer tree counts and the basal area should skew farther towards the larger trees, which will provide more shade and contribute larger and more functional large wood pieces to the stream and to the riparian management zone (RMZ), as well as providing higher quality and more durable snags when they fall or die. Leaving more, smaller trees would mean more ladder fuel and a greater likelihood of crown fires in the RMZs. We encourage the creation of patches of hardwoods in the RMZs to help break up the fuel continuity of conifers.

Where feasible, WDFW also recommends utilizing large trees that need to be cut as aquatic restoration trees. We recommend the trees be knocked over or winched over by equipment with root wads attached. This will decrease the mobility during higher flows and increase residence time for these key pieces in the streams.

If you are concerned about the potential effects of any activities in this proposal, what concerns you, and what changes you would like to see occur? *For example, rather than simply stating that you would like a change in a proposed activity or that you would not like the activity to take place, it is most helpful to understand why you desire this. What are your underlying concerns with an activity or action; what are the effects of the activity that concern you?*

We are concerned about the limited focus on terrestrial activities because of the limitation by permitting this under the Western Firesheds Emergency Action Declaration (EAD) (Bipartisan Infrastructure Law, Section 40807). We are hoping there will be opportunities to coordinate

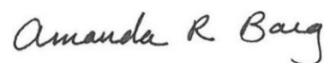
additional road work, including road decommissioning and aquatic organism passage, with the terrestrial work that will be covered by this EAD NEPA process.

If feasible, we recommend utilizing the existing Aquatic Environmental Assessment to coordinate with the terrestrial projects, in coordination with salmon recovery partners if feasible, to include any opportunities for removing or improving stream crossings for aquatic organism passage (AOP) and the subsequent benefit to fish and streams. WDFW maintains a database of fish passage barriers that we can share more specific details with the USFS to help target projects for improving AOP on forest service roads. Currently, in the Chumstick to Lower Peshastin Landscape Evaluation boundary, there are 342 known barriers. Since roads relate directly to the potential for unwanted sediment delivery to streams, we recommend considering the potential impacts and benefits of coordinating additional road work that is covered under the Aquatic Environmental Assessment, to maximize the funding resources available to improve the aquatic environment.

Overall, WDFW supports the need for prioritizing treatments to help move fire away from the Wildland/Urban Interface. This work is consistent with WDFW's goals for forestry on our lands, moving the distribution of stand types and conditions across the landscape to a more sustainable reference condition.

Thank you for the opportunity to comment on the Chumstick to LP Project proposal. WDFW staff are available to provide further technical assistance. If you have any questions, please call me at 509-429-9285 or email amanda.barg@dfw.wa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Amanda R. Barg".

Amanda Barg

Assistant Regional Habitat Program Manager, Region 2, WDFW

Cc: Carmen Andonaegui, Regional Habitat Program Manager, Region 2, WDFW

Ken Muir, Wenatchee Habitat Biologist, Region 2, WDFW

Brandon Austin, Forest Habitats Section Manager, WDFW