



Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

Joe Rausch, District Ranger
Cle Elum Ranger Station
803 W 2nd St.
Cle Elum, WA 98922

November 6, 2023

RE: Upper Swauk Restoration Project

Dear Mr. Rausch:

Please find enclosed a report to me from TFW Wildlife Biologist, Jeff Kozma, regarding the Upper Swauk Forest Restoration Project Notice of Proposed Action. Mr. Kozma reviewed this document and has some detailed comments and concerns regarding potential impacts on wildlife habitat, particularly for species that occupy the lower elevation dry forest, like the White-headed Woodpecker that is a Washington State sensitive species and a species of greatest conservation need. I encourage you to follow the recommendations summarized in the enclosed memorandum in order to add needed clarity to these procedures outlined in this project. If you have any questions regarding the nature of these comments, please contact Jeff at (509) 865-5121, ext. 6343.

Thank you for your time and consideration on this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Phil Rigdon", is located below the word "Sincerely,".

Phil Rigdon, Superintendent
Department of Natural Resources

C: YN, TFW Program

(files)

Enclosure



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TO: Phil Rigdon
Superintendent, Department of Natural Resources

THROUGH: Jim Matthews, TFW Coordinator

FROM: Jeff Kozma, TFW Wildlife Biologist

DATE: November 6, 2023

SUBJECT: Comments in regards to the Upper Swauk Restoration Notice of Proposed Action.

The USFS Okanogan-Wenatchee National Forest (OWNF) is proposing forest restoration activities in the Upper Swauk Restoration Project within the Cle Elum Ranger District. The project area encompasses the Wild Blew footprint, but also connects past planning efforts including, Swauk Pine Restoration, Liberty Fuels, Iron Restoration, and Fawn Thin to make a more widespread impact towards landscape restoration. The Upper Swauk project continues to emphasize whole landscape restoration with activities that restore terrestrial and aquatic ecosystems and attempt to mitigate the impacts from transportation infrastructure. I recently reviewed the wildlife related portions of the Environmental Analysis and have provided comments and recommendations below.

Page 15, first paragraph – Please explain what is meant by expanding and promoting firewood cutting. Because the OOWNF allows cutting of standing dead trees (snags) for firewood, expanding and promoting firewood cutting could negatively impact cavity nesting species, like the White-headed Woodpecker, that the plan targets to create habitat for.

Page 15, last paragraph – The plan states that, “Thinning of trees >11 DBH would occur in specific areas where shade tolerant species (e.g., grand fir) would act as ladder fuel growing under large fire-resistant trees (i.e., ponderosa pine, western larch, and Douglas-fir), **or in areas where trees with obvious insect or disease damage, including standing dead and dying trees is occurring**”. Does the information in bold mean these trees and snags will be selected for removal? What about the importance of snags to over 100 species in WA, especially woodpeckers? Areas containing these pockets of dead trees from insects, patch fires, diseases such as Armillaria, etc., are where many cavity nesting species nest because of the clustered occurrence of dead substrates. Patches of snags ranging from 0.25-1 acre should be left well-distributed throughout a harvest area. This is particularly true for the White-headed Woodpecker that often nests in open areas containing abundant snags that are adjacent to areas of live trees needed for foraging (Latif et al. 2015, Lorenz et al. 2015, Latif et al. 2020).

Page 15, third bullet - Thinning to 10 trees/acre would result in extremely open areas and would not function properly for forest dependent species, even in dry sites dominated by ponderosa pine. Recent research shows that White-headed Woodpeckers need stands of live ponderosa pine for foraging, even though they often select open areas containing snags (e.g., fire patches, disease

pockets, insect-killed trees) for nesting. However, trees at historical densities (~20 trees/acre) in fire-maintained forests were much larger at 23-28 in DBH (Agee 1996, Gaines et al. 2007) compared to those of today that range from 12-16 in DBH. Thus, to a White-headed Woodpecker those are not equivalent and today they would need more trees per acre post-harvest in order to meet their foraging needs because they primarily forage on live trees throughout the year (Lorenz et al. 2016, Kozma et al. 2020). Therefore, a better trees/acre target when tree diameters are small (e.g., <18 inch DBH) would be 45-55 trees/acre and retention trees should be of the largest diameter class available. This would enable follow-up thinning to the desired 20-25 trees/acre once they have reached a larger diameter. In general, the lower the trees/acre target, the greater the retention tree DBH needs to be.

Page 19, last paragraph – Are there estimates of acres to be treated in each of these forest types (e.g., dry dense forest, moist dense forests, etc.)? It would help to give them here, at the start of each forest type, so the reader can assess how many acres will be treated and the potential impacts to species. For example, treatments of moist dense and cold dense forest types may negatively impact species such as Pileated Woodpecker, Northern Goshawk, and American Martin.

Page 20, TPA bullet – See similar comment above (Page 15, third bullet); thinning to 10 trees/acre would result in open areas that would not function for forest dependent species, especially the White-headed Woodpecker.

Page 24, last paragraph, last sentence - Would this be done across all 8,584 acres of potential burned areas? I can't imagine there is money to delimb all trees in areas that are going to receive prescribed burns? At least, that is my interpretation from this sentence. Please clarify.

Page 24, third sub bullet under third bullet – Please define somewhere in the document what the plan considers a “legacy tree” (e.g., diameter limit, age determined through coring, etc.).

Page 63, Wildlife Header - On page 10, it is stated that the White-headed Woodpecker is the focal species for open old forest habitat. Yet, there is nothing here in this section that explains how dry forest treatments will benefit this species. It would be beneficial if you included information in this section to explain how this project affects the White-headed Woodpecker as you do for the Spotted Owl as the focal species in moist forests. There is only a listing in the table 16 that says “beneficial impact”. There is much recent research on White-headed Woodpecker habitat needs and including that here would be prudent.

Page 65, first paragraph – In this paragraph, it says “short term persistence of Northern Spotted Owl in WA will be challenging due to multiple factors. Omitted from this list is the real threat of continued clearcut timber harvest or heavy thinning of spotted owl habitat, especially in unoccupied habitat circles, even in SOSEAs. As a TFW Wildlife Biologist who reviews forest practice applications along the eastern side of the Cascades, I can attest that this is a real problem. If there is no habitat for spotted owls to occupy, how do we ever expect the species to recover.

Page 65, second paragraph, line 8 – Regarding the acreage listed for local fires, it looks like this is the total acres of the fire foot prints, yet being tied to this sentence, it implies this is loss of Spotted Owl habitat. I think this is misleading and could use clarification.

General Comment: The literature cited section is missing and needs to be added.

Literature Cited:

Agee, J. K. 1996. Achieving conservation biology objectives with fire in the Pacific Northwest. *Weed Technology* 10:417–421.

Gaines, W. L., M. Haggard, J. F. Lehmkuhl, A. L. Lyons, and R. J. Harrod. 2007. Short-term response of land birds to ponderosa pine restoration. *Restoration Ecology* 15:670–678.

Kozma, J. M., T. J. Lorenz, M. G. Raphael, K. L. Garrett, and R. D. Dixon. 2020. White-headed Woodpecker (*Dryobates albolarvatus*), version 2.0. In *Birds of the World* (A. F. Poole, Editor). Cornell Lab of Ornithology, Ithaca, NY, USA.

Latif, Q. S., V. A. Saab, K. Mellen-McLean, and J. G. Dudley. 2015. Evaluating habitat suitability models for nesting White-headed Woodpeckers in unburned forest. *Journal of Wildlife Management* 79:263–273.

Latif, Q. S., V. A. Saab, J. G. Dudley, A. Markus, and K. Mellen-McLean. 2020. Development and evaluation of habitat suitability models for nesting White-headed Woodpecker (*Dryobates albolarvatus*) in burned forest. *PLoS ONE* 15: e0233043.

Lorenz, T. J., K. T. Vierling, J. M. Kozma, and J. E. Millard. 2016. Foraging plasticity by a keystone excavator, the white-headed woodpecker, in managed forests: Are there consequences for productivity? *Forest Ecology and Management* 363:110–119.

Lorenz, T. J., K. T. Vierling, J. M. Kozma, J. E. Millard, and M. G. Raphael. 2015. Space use by White-headed Woodpeckers and selection for recent forest disturbances. *Journal of Wildlife Management* 79:1286–1297.

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