



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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September 4, 2025

Scott Robinson
District Ranger
USDA-Forest Service Okanogan-Wenatchee National Forest
Cle Elum Ranger District
803 West Second St.
Cle Elum, WA 98922

Subject: WDFW Comments on Upper Swauk Restoration Project Environmental Assessment

Dear Mr. Robinson:

Thank you for the opportunity to provide comments on the draft Environmental Assessment (EA) for the Upper Swauk Restoration Project. The Cle Elum Ranger District extended Washington Department of Fish and Wildlife (WDFW) an invitation to actively participate in the original planning and review of this project. That invitation demonstrates the desired involvement of WDFW in reviewing and ensuring that such a restoration project results in positive benefits for fish and wildlife habitat. WDFW has reviewed the draft restoration project proposal and offers the following comments to improve the proposal to ensure that fish and wildlife habitat are restored to the fullest potential.

WDFW previously commented on the notice of proposed action in November 2023. We would like to acknowledge changes in the draft EA that reflect incorporation of our comments. The EA incorporated WDFW's suggestions on inclusion of a list of aquatic restoration culvert projects that are part of the project and a list and map showing the areas of wood placement for habitat restoration. WDFW commented on the desire to incorporate wildlife habitat connectivity into both the purpose and need of the project along with incorporating wildlife connectivity into project specifics. WDFW notes that connectivity has been incorporated into the purpose and need and has been included in various elements of the proposal such as prescriptions for thinning and the travel analysis regarding roads. The travel analysis identified areas where road decommissioning, closure or relocation would benefit various resources including riparian areas. An example of this is the proposed Hurley Creek Road Relocation. We would like to acknowledge those additions.

The Upper Swauk Watershed needs both terrestrial and aquatic restoration activities because of past management actions. WDFW is encouraged and supportive that the proposed restoration in the EA has taken a holistic approach, tackling forest restoration, aquatic restoration and road management. To truly achieve watershed restoration, all components must be included.

Specific comments are as follows:

Wildlife Habitat Connectivity

In addition to the inclusion of habitat connectivity in the purpose and need of the EA and the landscape treatments, there are two references that are relevant to the wildlife connectivity in this landscape and WDFW recommends that both documents be referenced in the draft EA.

- I. On Page 46, the draft EA references Mule Deer connectivity. WDFW was part of the USGS study on the Wenatchee Mountains Mule Deer connectivity. Data and a summary of this study can be found in Ungulate Migrations of the Western United States, Volume 4. The report can be accessed and cited at: <https://doi.org/10.3133/sir20245006>
- II. WDFW and Washington Department of Transportation (WSDOT) completed the Washington Habitat Connectivity Action Plan in June 2025. In that report, the Upper Swauk is mapped as a connectivity area of importance for various wildlife species, both as a north to south and an east to west corridor. WDFW recommends citing this report in the EA to support the habitat connectivity of the document. The report can be found at: wdfw.wa.gov/publications/02630

Aquatic Restoration

As noted, WDFW appreciates that 41 water crossings and approximately 10 miles of large wood in-stream additions are planned for this project to restore the aquatic ecosystems. WDFW has a Memorandum of Understanding (MOU) with the USFS to implement the permitting of these aquatic projects. Please include WDFW early in the design phase of each of these projects. WDFW also recognizes that significant funds are needed to implement these large-scale restoration projects. When seeking funding for implementation of these aquatic projects, please consider WDFW a project partner and work together to seek grant funding for implementation.

Commercial Thinning Treatments:

Snags and Down Wood

WDFW appreciates the inclusion of protection of snags and large down wood (logs) into the thinning prescriptions (Appendix E, Design Elements Wildlife 6-8). Incorporation of these habitat features is critical to a wide array of wildlife species and will increase the habitat quality of this watershed.

Short snags (where the tree is topped and the bottom 10-15 of the trunk is left) are an important tool to create additional habitat for various wildlife species that use tree cavities for nesting and roosting. We recommend adding the creation of short snags to the Design Elements in Appendix E. Short snags should be created at least 2 per acre of treatment and should be created when thinning Douglas Fir or Ponderosa Pine that are at least 12 inches in diameter with preference of larger diameter trees.

Treatment in Northern Spotted Owl (NSO) territories

In Appendix B, Forest Stand Descriptions and Treatment Descriptions there are stand prescriptions for two NSO territories that contained recent activity by NSO pairs. The EA does not outline the need to do treatment in these territories and the EA does not analyze the effects of treatment within these territories on the pair's future activity and viability. We are concerned that

treatments in these territories could have impacts on the viability of the territory for continued occupancy. If treatment is proposed in these territories, we recommend doing a full analysis of the proposed treatments within these territories and ensuring that any treatments result in no reduction in overall habitat quality for NSO within these territories. Preserving habitat in these territories is critical to maintaining NSO within the Upper Swauk watershed.

Shaded Fuel Breaks

The shaded fuel break prescription, listed under Appendix B, states to thin a width of 1,000 ft. That width can create localized wildlife connectivity barriers without incorporation of various habitat elements to facilitate connectivity. Wholesale removal of understory habitats on such a wide scale can have significant detrimental effects on animals that have short distance dispersal and wildlife species who are reluctant to move through large areas without understory cover, particularly among the lower mobility species such as small mammals, herptiles, and some bird species. WDFW recommends incorporation of habitat elements such as small clumps of understory vegetation, logs and potentially even small log piles in areas that would not create ladder fuels to facilitate this connectivity. WDFW recommends an approximate spacing of 1-2 habitat elements every 100 foot of shaded fuel break to improve localized connectivity through the shaded fuel break. WDFW further recommends incorporating existing natural fuel breaks where they occur such as talus or bald areas to reduce the overall footprint of the fuel break.

Commercial Thinning Treatment Descriptions

In the thinning prescriptions for Dry Dense, Moist Dense and Cold Dense Forest the description lists to cut all encroaching conifers up to 25" dbh within 30' of individuals and clumps of Ponderosa Pine, Western Larch and Douglas Fir. Clumps are included in the retention prescription but does not provide a recommended size. WDFW recommends retaining clumps of 0.25-1 acre in size for microhabitat.

In all the commercial thinning prescriptions, the prescription calls for retaining mature trees >150 years old. Due to past management activities in the area, most trees are less than 150 years old, yet many younger trees have mature qualities and are resilient. WDFW recommends modifying this to trees >80 years old.

The commercial thinning prescriptions call for the removal of all grand fir and lodgepole pine. We understand that the proportion of these species, particularly grand fir, may be out of balance of expected historic and future conditions. Both species are native species that naturally occur in this watershed in various distribution. Both species can provide some habitat qualities to various degrees. WDFW recommends modifying this statement to cut individuals of these species when they do not align with the goals of the unit, but not wholesale removal.

The dry dense forest prescription lists a range of 20-40% canopy cover (CC) and 20-40 trees per acre (TPA). The lower range of this prescription is below the recommended TPA of recent local research on White-headed Woodpecker by Jeff Kozma of Yakama Nation who has published extensively on the habitat requirements of this species in Central Washington. White-headed Woodpecker has been demonstrated as a focal species for dry forest habitats. WDFW recommends altering the lower end of this prescription. Published literature on the species demonstrates that it is primarily a live tree forager and thus basal area is an important factor in its

habitat prescription. While 30-40 TPA may be sufficient if the retained trees are mature, large trees, 50-60 TPA may be necessary if the retained trees are smaller diameter, i.e., 13 inches.

The prescription for the moist dense forest is 20-40% CC, 20-40 TPA. Many of the wildlife species that depend on this forest type favor a closed canopy forest, including species such as Northern Spotted Owl, American Goshawk and Pileated Woodpecker. Implementation of this prescription will result in an open landscape, not conducive for these closed canopy species habitats. In areas where these species could persist, such as moist north facing slopes, we recommend altering the prescription to restore the area to a mature closed canopy forest.

Cold dense forest can support a unique suite of wildlife, often situated for a more closed canopy habitat, particularly on north facing slopes. The prescription outlined in the EA (20-45% CC, 20-50 TPA) for this forest type indicates that the intent is to create an open forest condition. Where this habitat type exists on north facing slopes, WDFW recommends shifting the prescription to align with species favoring a closed canopy forest.

Thank you for the opportunity to comment on this project and for WDFW to be part of the project planning and review of this project. WDFW looks forward to being a partner in the habitat restoration of this project and working towards improved fish and wildlife habitat. If you have questions regarding any of the above comments, please contact me at 509-607-3578 or Scott.Downes@dfw.wa.gov.

Sincerely,

A handwritten signature in cursive script, appearing to read "Scott Downes".

Scott Downes
Regional Land Use Lead

Cc: Cassandra Weekes, WDFW
Lisa Dowling, WDFW
Cody Gillin, WDFW
Daniel Leininger, USFS