Sept 5, 2025

Scott Robinson, District Ranger
Cle Elum Ranger District, Okanogan-Wenatchee National Forest
803 W 2nd St, Cle Elum, WA 98922

Re.: Draft Environmental Assessment re: Upper Swauk Restoration Project

Dear Ranger Robinson,

I am writing on behalf of Conservation Northwest and its 17,000 members to bring forward our questions, ideas, and suggestions regarding the Upper Swauk Restoration Project Draft Environmental Assessment (EA).

We write in support of the proposed action's intent to reduce the risk of forest loss to severe wildfire, restore late seral habitats for threatened and endangered species, and the integration of aquatic restoration (i.e. culvert replacement and in-stream wood). Especially under current administrative demands and constraints, we thank you for this integrated resource restoration effort.

We express gratitude that a number of suggestions in our NOPA comment letter seem to have been incorporated into the Draft EA (e.g. improved TPAs, snag retention, etc.)

ENVIRONMENTAL ASSESSMENT & OPPORTUNITY TO COMMENT

Thank you for completing an Environmental Assessment for this large-landscape, integrated project that includes much more information than the Notice of Proposed Action presented in 2023. We also appreciate the continued use of NEPA regulations 36 CFR 220 and the CEQ NEPA regulations from 2020. We regret the 15-day comment period which is insufficient to provide better composed comments that we would normally produce.

LANDSCAPE PRESCRIPTION

The 2020 DNR Upper Swauk Planning Area Landscape Evaluation Summary suggests a treatment goal of 14,000-22,000 acres.[1] When combined, the Draft EA treatment objectives – 5,698 acres non-commercial + 9,583 acres commercial (both with prescribed fire) + 6,381 acres prescribed fire only + 4,377 acres shaded fuel breaks + 36 acres structure protection – equate to 26,075 treatment acres. While we recognize that not all 26,075 acres will end up being treated, we would be remiss if we didn't note that potential treatment acres in the Draft EA exceed that which the landscape analysis suggests would move the project area toward a more resilient state (14,000-22,000 acres), especially with the potential loss of thousands of acres of denser LSR habitat through heavy-thin commercial treatments, and giant shaded fuel breaks.

[1] https://deptofnaturalresources.app.box.com/s/ejg0hx8l9n6uj5bfeocwd9km0qwme4eg/file/802685162664

We remain concerned about a "free thinning" method of tree harvest, particularly if units will not be marked by Forest Service staff in advance (the NOPA does not indicate how sales will be prepared). A machine operator – who has limited view from the cab – should not be "free thinning" according to unit prescription (designation by prescription). Thinning from below ("low thinning") mimics "the effect of natural mortality... [caused by] low to moderate severity fire while reducing ladder fuel" (NOPA p. 14), and will effectively reduce fire risk while achieving old tree, spatial pattern, and species objectives. "Crown thinning" and "free thinning" are overly focused on the elimination of "undesirable" trees and forest characteristics that we think are, in fact, desirable. For example, large diseased trees with mistletoe or forked tops and dense understory should still exist throughout the landscape, adding heterogeneity at sparser intervals.

We greatly value the extensive use of prescribed fire within this project in thinned and un-thinned stands and suggest that, in consultation with the USFWS, prescribed burning may take the place of certain thinning treatments that are under consideration within the project area, particularly in units near NSO circles (we note concerns about this in the Draft EA Wildlife Report p. 36), and those proposed as mechanically created fuel breaks.

WILDLFIE TREATMENT OBJECTIVES AND THINNING TREATMENTS

Overall, the treatment descriptions read as overly sanitizing, i.e. clearing out everything that is undesirable within the project area (e.g. retain "mistletoe-free," retain "blister rust-free," "cut all grand fir and lodgepole pine"). However, many of these "undesirable" characteristics and species are features that benefit wildlife, and contribute to landscape heterogeneity and, therefore, resilience.

We read the thinning prescriptions as confusing. The metrics do not make clear what the treatment is trying to accomplish and are likely to add a lot of confusion for a contractor, or forester administering a contract. **We strongly recommend pictures, graphics, and/or illustrations of what, for example, a "maintenance non-commercial thinning" unit should look like immediately post-treatment.**

We offer the following observations, knowledge, and suggestions to better protect, connect, and restore habitat for wildlife and ecosystem resilience in the Upper Swauk project area.

- It is not true that American Goshawks only nest in trees over 25" DBH. We have seen them nest in trees down to 14" DBH, though the likelihood of nesting goes up with tree diameter. However, what is most critical for the species is an entire high-volume/BA stand that is made up of larger/large trees, while still providing occasional understory and canopy gaps for hunting opportunities. It's a complex forest that can usually only be set up by making non-commercial entries that thin out small diameter trees and then leave a stand to grow once trees are of a large size, as fire would have left a stand.
- We know that Larch can continue to survive with severe mistletoe infection for hundreds of years, and whether a tree dies from mistletoe is usually a result of competition. Mistletoe is

the symptom of drought and competition, not the actual issue. For removal, we suggest doing the opposite of what is being prescribed: we suggest leaving all mistletoe infected trees >DMR 3 so that the worst infections in the largest trees are left on the landscape for wildlife value.[2] You could even kill and retain the large diameter infected trees (> 20" DBH) to increase snag levels. Stands and trees with low levels of mistletoe are what should be targeted for removal, the same way fire would have selected. Then, as you reintroduce fire to the landscape with future maintenance burns, the mistletoe left on the landscape has a low rate of spread because newly infected, regenerating trees are entirely killed by fire.

- The DNR Landscape Evaluation notes that moist forests "historically had mixed-severity fires every 30-100 years... were composed of fire-resistant (western larch, and Douglas-fir) and fire-intolerant (grand fir) trees." We are concerned that the wholesale removal of grand fir and lodgepole pine in all forest types will decrease forest heterogeneity and, therefore, wildlife habitat for a variety of species and their prey such as northern goshawk, pileated woodpecker, flying squirrel, and snowshoe hare. These soft-wood tree species provide nesting and foraging habitat, rot, and needed forest decadence. Furthermore, eastern Washington forests are deficient in large trees >20" DBH and while a large grand fir may not be preferable, it is a good place-hold while more fire-tolerant species come back online. Lodgepole pine is likely to have always persisted in cool, dry locations on the landscape and there should be some places where they continue to persist; even a few dog-hair tree thickets can provide unique cover habitat for wildlife. For example, a 150-200 year old Lodgepole can easily support a DBH under 25". If the intention is to retain old and large trees, lodgepole should be considered as well. Cones from these large and old trees have high wildlife value. We note that, as per the Revised Recovery Plan for NSO, "older trees likely present before fire exclusion should also be retained, regardless of their fire tolerance."[3]
- We recommend removing any prescription components that rely on canopy cover (CC). We predict there will be confusion from the biologist to the contractor to the forester about what canopy cover vs canopy closure, which one is important, and which one the USFWS is using for consultation. Instead, prescriptions should aim for specific basal areas, trees per acre, or other such metrics that field foresters and contractors can easily estimate.
- The non-commercial tree per acre designations are incredibly variable (i.e. 30-80, 20-80) and need to be more specific. There is no way to understand how the stands should look or will turn out based on this information, and it is unclear how the information will be reduced further into a contract for the contractors to understand it. Non-commercial thinning TPA range should be more restricted and site specific, leaving 30-70 TPA on dry sites, and 40-80 TPA on moist sites.
- In the commercial treatment descriptions, according to "Target Species for Removal," if a 24" DBH Douglas-fir tree exists 15' from a 25" DBH ponderosa pine, the very large Douglas-fir tree will be removed. Large, and especially large and old trees, often grow up with roots and canopies acclimated to the close proximity of their neighboring tree, and large

[2] Hawksworth, F. 1977. The 6-class Dwarf Mistletoe Rating System. USDA General Technical Report RM-48. https://www.fs.usda.gov/rm/pubs_series/rm/gtr/rm_gtr048.pdf
[3] U.S. Fish and Wildlife Service. (2011). Revised Recovery Plan for the Northern Spotted Owl (Strix occidentalis caurina).U.S. Department of the Interior, Fish and Wildlife Service, III-34.

and old trees (like Douglas-fir) have thick, fire resilient bark along with self-masting lower branches to limit risk to nearby ponderosa pines. Furthermore, to retain clumps, trees < 25" DBH will need to be retained, or else there will not be many clumps. Trees from 18"-25" are great candidates for the next largest trees and likely belong to the same cohort of trees that contain 25"+ trees. We know trees > 25" DBH are lacking on the landscape, so if that is all that is retained, we are concerned all that will be left are some parked-out large trees that die from post-harvest factors such as humidity/transpiration changes, insects, prescribed fire, and windthrow. Large, old trees have an outsized ecological role to play in long-term forest health (i.e. carbon sequestration, hydrologic redistribution, wildlife habitat, mycorrhizal importance, etc.), exist in low quantities on the OWNF, and take a long time to grow. Their preservation and recruitment on the landscape is critically important.

- As per our NOPA comments, we remain concerned that commercial harvest in the uplands will remove too much wildlife habitat, especially for sensitive species such as White-headed woodpecker where research suggests a mean tree density of nest stands at 74 TPA with 80% of stands having a live tree density of at least 50 TPA.[4] The project uses heavy thinning to mimic historic, fire-maintained, ponderosa pine forest density. However, trees at lower densities (20-40 trees/acre) were much larger historically (>20" DBH) compared to those of today that range from 12-15" 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. To restore the amount and patch size of open-canopy old forest habitat for white-headed woodpecker a better TPA target when tree diameters are small (e.g., <18" DBH) would be 50-60 trees/acre and retention trees should be of the largest diameter class available.[5] The DNR Landscape Evaluation suggests that "when consistent with the Northwest Forest Plan, lighter, variable density thinning in mid-sized stands can accelerate habitat development." Particularly in the moist-cold forest type, med-large dense structure class should remain at nearly 50% of the post-treatment proportions "to meet habitat, wood production, and other objectives."
- The Forest Service standard range-wide definition of dispersal habitat for NSO is 40-59% canopy cover (amongst other metrics),[6] and we appreciate the attempt to find balance between reducing fire risk and maintaining LSR, i.e. > 60% CC inside NSO range. However, please note our advice against using CC when writing mechanical prescriptions.
- We know that a large majority of the project area (78%) is frequent-fire dependent, perhaps at a 13-year fire return interval (Draft EA Wildlife Report p. 17 -18). However, there is much we do not know about Northern Spotted Owl response to fire.[7] In the Revised Recovery Plan for the Northern Spotted Owl (2011), there are three objectives to conserve NSO,

[4] Kozma, J. M. 2011. Composition of forest stands used by White-headed Woodpeckers for nesting in Washington. Western North American Naturalist 71:1–9.
[5] Kozma, J. White-headed Woodpecker habitat summary compiled by Jeff Kozma, TFW Wildlife Biologist, Yakama Nation.
[6] Randi Riggs. Previous Endangered Species Biologist, U.S. Fish and Wildlife Service, Ecological Services Division, Washington East Cascades Zone, Central Washington Field Office. Personal communication, September 19, 2022.
[7] U.S. Fish and Wildlife Service. (2011). Revised Recovery Plan for the Northern Spotted Owl (Strix occidentalis caurina).U.S. Department of the Interior, Fish and Wildlife Service, III-31.

none of which include "excluding disturbance events such as fires, including high-severity fires."[8] Treatments must be crafted and located to reduce wide-scale high-severity fire, and "designed to increase the acceptability of wildfire through reducing fire behavior and severity in local areas, rather than simply to reduce fire occurrence, size, or amount of burned area per se (Reinhardt et al. 2008)."[9] While we appreciate the higher CC, BA, and TPA inside of NSO range, we still think the prescriptions are overly sanitizing and will remove too much NRF habitat as written. Just because models predict only 13% NRF habitat in the project area by mid-century (Draft EA Wildlife Report p. 22), doesn't mean we should ourselves shrink it in advance. Conservation Northwest's risk tolerance for fire is much higher than most. Ultimately, we should be prepared that it may not matter how we lose large trees - whether to fire or timber - we may not get them back due to increasing soil and atmospheric moisture deficits.

- We are delighted to see specific Project Design Criteria regarding dead and down wood, snags, and mature forest connectivity – especially the call to retain all snags (regardless of size, presumably) unless they pose a safety hazard. Research suggests a good snag target of >5 snags (of the largest diameter class available)/acre to maintain nesting persistence by white-headed woodpeckers.[10]
- Despite our problem with CC metrics, we appreciate the increased % CC for shaded fuel breaks (20-40% vs. 10-30% in the NOPA), and the specific guidelines in Riparian Reserves. Nonetheless, we still feel that 4,377 acres of 1000ft wide shaded fuel breaks is a mistake and will result in too much habitat loss, especially along Iron Creek, Blue Creek, and Mill Creek tributaries. As we've said before, fuel breaks do not match the intent of mimicking natural disturbance on the landscape. Ecologically, they create unnatural linear features across the landscape that can impact wildlife movement patterns and create edge effect and modify the presence and abundance of certain wildlife species.[11] The changing climate is creating drier fuels and longer fire seasons. This increases the potential for extreme fire behavior where embers can travel long distances during high fire growth periods and render shaded fuel breaks ineffective at stopping or slowing fire spread. Shaded fuel breaks can also have the opposite effect as intended by acting as "wicks" for fire spread, if not maintained routinely to remove ingrowth.[12] Additionally, current research suggests that shaded fuel breaks along ridgetops might not be as effective as previously thought.[13] Compared to ecologically-based landscape level thinning and prescribed burning treatments, which strategically reduce surface and ladder fuels and create gaps and openings within forested stands at a broad scale,

[8] U.S. Fish and Wildlife Service. (2011). Revised Recovery Plan for the Northern Spotted Owl (Strix occidentalis caurina).U.S. Department of the Interior, Fish and Wildlife Service, III-32.
[9] U.S. Fish and Wildlife Service. (2011). Revised Recovery Plan for the Northern Spotted Owl (Strix occidentalis caurina).U.S. Department of the Interior, Fish and Wildlife Service, III-37.
[10] Linden, D. W., and G. J. Roloff. 2015. Improving inferences from short-term ecological studies with Bayesian hierarchical modeling: White-headed Woodpeckers in managed forests. Ecology and Evolution doi:10.1002/ece3.1618
[11] Connor, E.F., McCoy, E.D. (2013) Species–Area Relationships Encyclopedia of Biodiversity, Pages 640- 650.
[12] Fox, J.W., and T. Ingalsbee. (1998). Fuel reduction for firefighter safety. Proceedings of the Second International Wildland Fire Safety Summit. Withrop, WA: International Association of Wildland Fire
[13] Povak, N. A., Hessburg, P. F., and Salter, R. B. (2018). Evidence for scale-dependent topographic controls on wildfire spread. Ecosphere 9(10):e02443. 10.1002/ecs2.2443 Prichard, S. J., Peterson, D. L., & Jacobson, K. (2010).

shaded fuel breaks have limited effect on reducing fire severity or spread. One of the main intentions of shaded fuel breaks is to provide control and anchor points for the management of wildfire. However, the best anchor and control points are where thinning and prescribed burning have been completed and where maintenance burning is performed.[14] The broad scale of landscape treatments provides additional options for firefighters instead of constraining them to a predetermined location that may not be the most beneficial for the current weather and fire activity. When considering the extensive thinning and prescribed burn treatments proposed in this project and recent nearby fire footprints, we support smaller-width fuel breaks for structure protection and around WUI areas only. We also suggest retaining large disease/deformed trees within these fuels breaks since, by nature, these are heavier thinned areas with less spread of disease.

HYDROLOGY & TRANSPORTATION

On page 24 in the Draft EA it states: "All new and existing temporary roads will be closed and hydrologically stabilized at the end of the project." Notwithstanding their location in LSR in which new roads must be kept to a minimum, routed through non-LSR habitat where possible, and designed to minimize adverse impacts (NWFP S&G C-16), we share a reminder that any new temporary roads and any temporary roads reestablished on the old legacy road prism must be decommissioned post-harvest, not closed and hydrologically stabilized (Forest Service Manual 7700).[15] The Draft EA is correct on page 29 in Table 8 where it states: "Temporary roads used for commercial thinning and log haul would be decommissioned after use."

There is an astonishing total of 156 miles of unauthorized roads in the project area (Draft EA p.29). If, as proposed, the project decommissions 43 miles of unauthorized road, but also adds 25.5 unauthorized miles to the official road system, then only 17.5 miles of unauthorized road (or 11% of unauthorized roads on the landscape) will be decommissioned. It seems highly unlikely that the remaining 89% of unauthorized roads will naturally decommission themselves over time, are and will not cause resource concerns, and/or would cause more disturbance if decommissioned (Draft EA p.29). Furthermore, authorized Forest System road mileage will only decrease by 0.28 miles if/when this project is completed decades from now (Draft EA p. 30). Despite modest road density improvements, the hydrology report indicates that Watershed Condition ratings will hardly improve, including in Riparian Reserves. The fact that long-term recreation activities are expected to continue with no changes (Draft EA p. 80) is also a sign of unrealized aquatic and connectivity gains, and a missed opportunity to right-size the road system and direct recreation – particularly motorized

[14] Prichard, SJ, Hessburg PF, Hagmann RK, Churchill DJ, Povak NA, Dobrowski S., Gray RW, Huffman D, Hurteau MD, Kane V., Pratima KC, Keane RE, Kobziar L, Lake FK, North MP, Safford H, Stevens J, Kolden C, Parks S, and Yocom L. (2021). Adapting Western North American Forests to Climate Change and Wildfires: Ten common questions. Invited feature. Ecological Applications, Vol 31, Issue 8.

[15] Forest Service Manual 7700 temporary road definition: Roads authorized by contract, permit, lease, other written authorization, or emergency operation not intended to be part of the forest transportation system and not necessary for long-term resource management. These roads are not included in the National Forest System road inventory and are decommissioned after use… During the time periods in between use, these roads must be temporarily blocked. After final use of the road is complete, the temporary road will be fully decommissioned.

recreation – to the most appropriate locations within the project area. **We feel it is unacceptable that a resource-integrated project of this size and duration would not significantly shift the needle when it comes to watershed health as measured by the USFS Watershed Condition Framework.** Roads greatly increase the likelihood of undesired fire starts. If a major purpose of this project is to reduce fire risk and to restore watershed function (Draft EA p. 3), the project should close/decommission substantial road mileage within the project area – particularly unauthorized roads – and concentrate recreation in manageable locations.

TRIBAL PARTNERS

We thank the District for their efforts to consult with the Confederated Tribes and Bands of the Yakama Nation and the Confederated Tribes of the Colville Reservation. The EA would benefit by explaining the intentional outcomes and decisions made that benefit Tribal priorities and sovereignty as result of those consultations.

Conservation Northwest's Forest Field Team has a personal and ethical interest in working with our Tribal partners and practicing conservation through reconciliation action.[16] We are committed to fulfilling trust and treaty obligations and supporting co-stewardship opportunities that enhance Tribal ecocultural resources and use of traditional ecological knowledge as outlined in the 2023 USFS Tribal Action Plan and other USFS documents.[17,18,19] As you plan this project, we recommend ongoing practice of these recommendations from the report "Braiding Indigenous and Western Knowledge for Climate-Adapted Forests: An ecocultural state of science."[20]

1. Adopt proactive stewardship.
2. Recognize and respect Tribl Sovereignty and Indigenous knowledge.
3. Provide the flexibility to steward dynamic landscapes and navigate uncertainties under rapidly changing conditions.
4. Ground agency planning, and land and resource stewardship policies in an ethic of reciprocity and responsibility to many future human generations.
5. Catalyze innovative approaches to forest stewardship.

[16] Syrowitz, J. 2024. Prioritizing Tribal values, collaboration and reconciliation are how we will heal the land and its people. https://conservationnw.org/news-updates/prioritizing-tribal-values-collaboration-and-reconciliation-are-how-we-will-heal-the-land-and-its-people/

[17] USFS. 2023. Strengthening Tribal Consultations and Nation-to-Nation Relationships. A USDA Forest Service Action Plan. FS-1211. https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/Strengthening-Tribal-Relations.pdf

[18] Charnley, S., Fischer, A., Jones, E. 2008. Traditional and Local Ecological Knowledge about Forest Biodiversity in the Pacific Northwest. USFS Pacific Northwest Research Station. General Tech Report PNW-GTR-751.

[19] Long, J., Frank, L., Lynn, K., Viles, C. 2018. Chapter 11: Tribal Ecocultural Resources and Engagement. In: Synthesis of science to inform land management within the Northwest Forest Plan area. Authored by Thomas A. Spies, Peter A. Stine, Rebecca A. Gravenmier, Jonathan W. Long, Matthew J. Reilly. USFS Pacific Northwest Research Station. General Tech Report PNW-GTR-966.

[20] Eisenberg, C., Prichard, S., Nelson, M., Hessburg, P. 2024. Braiding Indigenous and Western Knowledge for Climate-Adapted Forests: An ecocultural state of science report. https://depts.washington.edu/flame/mature_forests/pdfs/BraidingSweetgrassReport.pdf

IMPLEMENTATION CAPACITY

We note that required botany, wildlife, cultural, and other such surveys will be completed before project implementation. We offer our assistance (money and/or muscle) to complete these important surveys well before contracts are carried out on the ground.

Thank you for considering our comments as you finalize the EA.

Sincerely,

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