



September 5, 2025

Cle Elum Ranger District
US Forest Service
803 W. 2nd Street
Cle Elum, WA 98922

Dear Ranger Robinson,

These are staff-level comments developed Alex Conley, Executive Director of the Yakima Basin Fish and Wildlife Recovery Board. Due to the short comment period, the Board of Directors has not reviewed the proposal or these comments.

Given the short notice, we are not providing input on the upland vegetation elements of this EA; others are better placed to provide specific feedback. The overall goals of this project are consistent with our Yakima Steelhead Recovery Plan, which highlights the need for forest restoration projects to reduce catastrophic fire risk and improve watershed hydrology.

We would like to highlight the need to coordinate the vegetation treatment work with the other actions included in the EA. Too often, we see some actions in an EA like this completed, and others left undone due to lack of priority or funding. We encourage USFS to utilize stewardship contracts for the commercial timber sales, and to use a combination of stewardship items and retained receipts to implement non-timber activities like the proposed fish passage projects, instream restoration and road system projects. Ensuring that timber receipts are reinvested in the watershed that generates them is the best way to complete a broad-based project like this.

We also encourage USFS to work closely with partners active in stream restoration in the Yakima Basin to prioritize, plan and implement these critical project elements. It would be good to see a more detailed implementation plan identifying how and when specific actions identified in the EA will be completed, what the next critical steps are (e.g. what the survey and design status is for proposed Aquatic Organism Passage (AOP) Projects), what funding amounts and expected sources are needed (at a typical cost of \$250k each, just the 41 proposed AOP projects would require over \$10 million to implement) and how any needed partnership agreements will be developed. While this may be outside of the immediate scope of this NEPA analysis, collaboratively developing a robust implementation plan will be a critical step in achieving the proposed goals on the ground and should be a priority.

We also highlight the need to ensure that activities fuels treatments and prescribed fire actions are funded and implemented in full and in a timely manner. Without them expensive efforts to reduce fuels and fire risk instead simply rearrange fuels and can even increase fire risk. As with aquatic actions, a robust and realistic funding and implementation plan that is fully implemented is essential. Sadly, there are many examples in the region where this has not occurred in a timely fashion, reducing the efficacy of treatments.

We support the general direction proposed for road system changes and have been actively involved in similar efforts to work with diverse groups to 'right-size' forest road networks. However, we do note that the road maps included in the draft EA are hard to understand and each incomplete (as no one map combines changes to authorized and unauthorized roads). This creates confusion about what is and

proposed to change, how that connects to the trail network (only partially shown), how roads connect to others outside the project area boundaries (roads just end at the boundaries), and how it relates to the often different road network identified in the US Forest Service Visitor Map and widely used applications like OnX. In our brief conversations with road users about whether and how the proposal would impact them, we found the maps a source of confusion and frustration. Improving the maps prior to finalizing the EA and providing them in a single interactive digital format would help ensure they are understandable and accessible to road users and will greatly facilitate implementation of road actions included in this EA. Better maps will avoid confusion and allow more focused and specific discussions about when, where and how road improvements, closures and decommissionings occur. Such discussions are essential in order to reduce public opposition (which results in illegal road use and unauthorized road establishment) and to ensure that a range of quality road and trail experiences are maintained while meeting the goals of reducing the impacts of high road densities and poorly functioning roads on watershed hydrology and wildlife.

Finally, we offer a few specific comments:

- 1) On p.53 the EA notes steelhead as “Spawning, rearing and critical habitat in Swauk, Iron, and Williams Creeks.” Intrinsic Potential modelling developed as part of the NOAA Middle Columbia Steelhead Recovery Plan also identified likely steelhead spawning and rearing habitat in portions of Mill, Baker, Medicine, Hovey, and Hurley Creek (all tributary to Swauk Creek) and Lion Gulch, Cougar Gulch and Boulder Creek (tributaries to Williams Creek). These areas should be considered likely steelhead habitat; we are glad to provide the mapped model results if that is useful.
- 2) On p. 54 in the EA redband trout are discussed as if they are a separate species from steelhead. Both are simply different life history forms of *Onchorynchus mykiss*, and in Swauk and other streams in the Yakima Basin, are part of a cojoined interbreeding population.
- 3) On p 63, the EA states that “On average, late-season streamflow (July-September) as modeled by WEPPcloud averaged 13 cubic feet per second higher post-treatment as compared to existing conditions, indicating a potential to increase and offset late-season low flows when high stream temperatures are of most concern.” Current baseflows of Swauk Creek in the project area drop under 2 cfs at times, so this model result would be a more than 7-fold increase in stream flow in baseflow periods. This is highly unlikely to occur in reality and is without documented precedent in the area. This model result should not be relied on to offset other negative impacts on flow and temperature from the project. We highly recommend robust stream flow and temperature monitoring be in place before, during and after project implementation to characterize any changes in baseflow and stream temperature and improve future estimates of flow impacts from similar projects.

Thank you for the opportunity to offer comments on this proposal; we greatly appreciate the hard work you and your staff have put in to develop this ambitious forest restoration project and look forward to supporting the District in final development and implementation of proposed actions.

Sincerely,

Alex Conley
Executive Director