**VIA Link:** https://www.fs.usda.gov/r06/okanogan-wenatchee/projects/68983

April 14, 2026

Erica Taecker
District Ranger
600 Sherbourne St.
Leavenworth, WA 98826

Dear Erica:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide comments on the Eagle Creek Project Draft EA.

AFRC is a regional trade association whose purpose is to advocate for sustained timber yield harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Okanogan-Wenatchee National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

The 5,130-acre Eagle Creek project area was originally part of the larger Chumstick to Lower Peshastin Project Environmental Assessment (EA), which was scoped to the public in September 2023. Due to wildfire impacts in that project area in 2025, the Chumstick to Lower Peshastin EA was put on hold and this project area, which was not impacted by wildfire, is moving forward as a standalone EA. AFRC was very involved in the development of the Chumstick to Lower Peshastin EA having had two field trips with the Forest into the area and by submitting scoping comments on October 16, 2023.

The Forest did a good job analyzing the probability of wildfire during scoping. That document stated: The planning area is evenly divided between public and private ownership, with 51% being USFS land and **fire risk is high to extreme across the northern portion and in the southwest corner of the planning area due to high fuel loads and burn probability. The northern portion represents some of the highest fire risk in eastern Washington**. A landscape evaluation was completed by the Washington DNR, and they recommended treating

43-63% of forested acres to increase resilience and reduce fire risk to communities using a combination of mechanical, prescribed fire, and managed wildfire treatments.

Unfortunately, due to several factors, the planning on the original project was delayed **and the predicted wildfire hit the area**. Following the wildfire of 2025, the Forest first opted to do a series of categorical exclusions using CE 6. However, a court ruling vacated the use of that CE and now the Forest is moving forward with a Draft EA to address the continued high risk of wildfire.

AFRC strongly supports the Eagle Creek Project moving forward and the Purpose and Need for the Project which includes:

- Restore the mosaic patterns of individual trees, clumps, and openings commonly found in pine and mixed conifer forests as well as other forest types.
- Reduce elevated risk of wildfire, while increasing opportunities for effective fire suppression by reducing fuels which have accumulated in the project area.
- Reduce inter-tree competition and risk of insect mortality.

While we strongly support the Project and the Purposes outlined, we offer the following comments which we think will strengthen and support the Project moving forward.

1. Due to the poor forest health conditions in the project area, and the history of wildfire, AFRC strongly supports the Forest using the emergency authority: IIJA 40807 Forest Health and Fuels Emergency Situation Determination (ESD) to expedite treatment implementation.

2. AFRC believes there should be an additional Purpose of the Project, which is presented in the landscape evaluation, to "Enhance rural economic development." Many of the high treatment priority areas have road access and are capable of producing significant timber volume. Although warming trends and high burn probability will necessitate managing lower densities and fuel loads, long-term timber production will likely be possible in much of the USFS and industrial ownerships.

   AFRC believes that the Forest Service should take pride in the fact that they provide a crucial renewable resource to the public that they serve. We understand that every treatment proposed in this Project will likely be designed to meet numerous objectives, but having one of the objectives be to contribute to the local economy is a key provision of this Project and should be a key part of every project the Forest develops.

   Our members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. This supply is important for present-day needs but also important for future needs. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of particular importance is how those treatments affect the long-term sustainability of the timber resources on Forest Service managed land. AFRC has voiced our concerns many times regarding the long-term

sustainability of the timber supply on Forest Service land and how the current management paradigm is affecting this supply. Treating the land to remove overstocked trees helps to provide a sustainable supply of timber products. Studies have shown that for each one million board feet harvested in Washington State an estimated 12-15 jobs are created. These economic facts would suggest that the Forest should treat the maximum number of acres. Unfortunately, there are 1,762 acres identified as General Forest, and only 954 acres planned for commercial harvest.

Furthermore, much of the Eagle Creek landscape is located on lands that are designated as Matrix by the Northwest Forest Plan especially in the central part of the Project area. AFRC would like to remind the Forest that the primary objective of Matrix lands is to provide raw materials to local communities, and we suggest treating as many Matrix acres by mechanical means as possible to meet this objective.

3. Specific logging methods are described in the Draft EA including: *"Subject to restrictions described in the design criteria, tree removal methods would include mechanized logging that utilize feller bunchers and log skidders and/or logging with a heel-boom log loader (commonly referred to as "shovel" logging). Except for minor inclusions of steeper areas, any proposed mechanized thinning on slopes greater than 35% would utilize purpose built tethered equipment for felling and yarding on steep slopes. In steeper areas cable logging would be used, where conventional timber falling occurs using chainsaws or tethered felling machines and cut material is yarded with skyline towers. Areas with no road access would utilize helicopters to yard cut material to landings."*

   AFRC would like to remind the Forest that there are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland. This is especially true with the Eagle Creek Project. The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EA's and contracts (i.e. dry conditions during wet season, wet conditions during dry season).

   We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Okanogan-Wenatchee National Forest market area with a variety of skills and equipment. Developing an EA contract that firmly prescribes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address

this issue, we would like to see flexibility in the EA contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposal area may be planned for cable harvest, there may be opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. While we appreciate the language mentioning ground skidding may take place on slopes over 35% if approved, we would like the Forest to allow ground-based equipment to operate on slopes up to 45% or steeper. AFRC knows that studies regarding ground skidding on steeper slopes have been evaluated and the results have been positive. Allowing the use of processors and fellerbunchers throughout these units can increase economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest.

Tethered-assist equipment is also becoming a more viable, safe, and available option for felling and yarding on steep slopes. This equipment has been shown to contribute to little additional ground disturbance when compared to traditional cable systems. Limited availability of high lead systems in certain market areas is making the treatment of steep slopes questionable. Inclusion of tethered-assist systems will increase the likelihood that those areas can be treated to attain the project objectives.

Finally, AFRC would like the Forest to examine the days that operations and haul are shut down due to hunting seasons and other outdoor recreation. The logging community has limited operating time at best, and further reductions such as these only makes surviving in the logging business much more difficult.

4. We continue to urge the District to do a complete evaluation of the No Action Alternative. We suggested this in the Chumstick to LP scoping document, and it was proven true with the recent wildfire in the area.

   Below are our comments that we submitted in our scoping letter. *AFRC would like to see the District accurately describe the impacts of the No Action Alternative over the life of the Project. Your data shows that much of the project area is dominated by dense older stands in need of thinning treatments. Past stand replacement fires in recent years or commercial harvesting have created even-aged stands with uniform structures that are also in need of thinning. Finally, stands in some of the higher elevations have not experienced disturbance since the early 1900s and are mature with mixed species. Fire exclusion combined with natural vegetation development and past management has resulted in changes to the vegetative patterns on the landscape. Additionally, there have been several large fires in the past decade in the Project area that have destroyed thousands of acres and the same could occur in this landscape. The Forest Service should consider these impacts among possible outcomes of the no action alternative.* We strongly believe that a more factual No Action alternative will lay out all of the possibilities of additional wildfires, insect and disease outbreaks, and show additional urgency for management.

5. The Draft EA discusses possible management in the Riparian Areas. *The document states: "the project would apply activity-dependent design criteria within riparian reserves, to meet Aquatic Conservation Strategy objectives. Riparian design features would protect water resources by minimizing impacts from surface disturbance, vegetation loss, and timber harvest that could result in increased sedimentation, altered drainage patterns, and degraded water quality."*

   It has been well documented that thinning in riparian areas accelerates the stand's trajectory to produce large conifer trees and has minimal effect on stream temperature with adequate buffers. Removal of suppressed trees has an insignificant short-term effect on down wood, and ultimately a positive effect on long term creation of large down woody debris and large in-stream wood, which is what provides the real benefit to wildlife and stream health. We encourage the Forest Service to focus their riparian reserve treatments on a variety of native habitats. Utilization of gap cuts to promote early seral habitat in the reserves, treatments to diversify all areas of the reserve, and prescriptions that account for the full range of objectives.

   The tradeoffs that the Forest Service will likely be considering through the ensuing environmental analysis will be between achieving these forest health benefits and potentially having adverse impacts to streams. These impacts to streams typically include stream temperature, wood recruitment, and sedimentation associated with active management. We would like the Forest Service to review the literature cited below and incorporate its findings into your environmental analysis that will shape the level of management permitted to occur in riparian reserves.

   Please consider the literature outlined below to inform your analysis.

   ***Stream temperature***

   Janisch, Jack E, Wondzell, Steven M., Ehinger, William J. 2012. Headwater stream temperature: Interpreting response after logging, with and without riparian buffers, Washington, USA. *Forest Ecology and Management,* 270, 302-313.

   Key points of the Janisch paper include:

   - The amount of canopy cover retained in the riparian buffer was not a strong explanatory variable to stream temperature.
   - Very small headwater streams may be fundamentally different than many larger streams because factors other than shade from the overstory tree canopy can have sufficient influence on stream temperature.

   Anderson P.D., Larson D.J., Chan, S.S. 2007 Riparian Buffer and Density Management Influences on Microclimate of Young Headwater Forests of Western Oregon. *Forest Science,* 53(2):254-269.

Key points of the Anderson paper include:

- With no-harvest buffers of 15 meters (49 feet), maximum air temperature above stream centers was less than one-degree Celsius greater than for unthinned stands.

### *Riparian reserve gaps*

Warren, Dana R., Keeton, William S., Bechtold, Heather A., Rosi-Marshall, Emma J. 2013. Comparing streambed light availability and canopy cover in streams with old growth versus earlymature riparian forests in western Oregon. *Aquatic Sciences* 75:547558.

Key points of the Warren paper include:

- Canopy gaps were particularly important in creating variable light within and between reaches.
- Reaches with complex old growth riparian forests had frequent canopy gaps which led to greater stream light availability compared to adjacent reaches with simpler second-growth riparian forests.

### *Wood Recruitment*

Burton, Julia I., Olson, Deanna H., and Puettmann, Klaus J. 2016. Effects of riparian buffer width on wood loading in headwater streams after repeated forest thinning. *Forest Ecology and Management*. 372 (2016) 247-257.

Key points of the Burton paper include:

- Wood volume in early stages of decay was higher in stream reaches with a narrow 6-meter buffer than in stream reaches with larger 15- and 70-meter buffers and in unthinned reference units.
- 82% of sourced wood in early stages of decay originated from within 15 meters of streams.

### *Sedimentation*

Rashin, E., C. Clishe, A. Loch and J. Bell. 2006. Effectiveness of timber harvest practices for controlling sediment related water quality impacts. *Journal of the American Water Resources Association*. Paper No. 01162

Key points of the Rashin paper include:

- Vegetated buffers that are greater than 33 feet in width have been shown to be effective at trapping and storing sediment.

Collectively, we believe that this literature suggests that there exists a declining rate of returns for "protective" measures such as no-cut buffers beyond 30-40 feet. Resource values such as thermal regulation and coarse wood recruitment begin to diminish in scale

as no-cut buffers become much larger. We believe that the benefits in forest health achieved through density management will greatly outweigh the potential minor tradeoffs in stream temperature and wood recruitment, based on this scientific literature. We urge the Forest Service to establish no-cut buffers along streams no larger than 40 feet and maximize forest health outcomes beyond this buffer.

The links to the studies mentioned above are listed below for reference.

Janisch paper on stream temps:
https://www.sciencedirect.com/science/article/abs/pii/S037811271100782

Dana Warren paper on light into the stream beds:
https://www.researchgate.net/publication/311850456_Long-term_effects_of_riparian_forest_harvest_on_light_in_Pacific_Northwest_USA_streams

Julie Burton Paper on headwater widths and wood recruitment:
https://www.semanticscholar.org/paper/Effects-of-riparian-buffer-widthonwoodloadingin-Burton-Olson/13c41421e2b6bf5eca847c4fb557235f3411127f

Edward Rashin article on Effectiveness of timber harvest practices for controlling sediment related water quality impacts:
https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1752-1688.2006.tb05303.x

6. The document outlines that the WUI will be the primary focus for treatments, but areas outside the WUI will also be treated to prevent wildfire from reaching the WUI. These treatments aim to restore the structure and composition of the landscape, reduce stand density and ladder fuels, which is in line with projected past and future reference conditions. In these treatment areas, AFRC suggests thinning to a basal area of 40 sq.ft. per acre. This accomplishes the objective of reducing fuels, enhancing tree vigor, and providing raw material for the local wood products industry.

7. AFRC also supports using Designation by Prescription (DxP) to implement prescribed treatments in the harvests units to reduce sale preparation time and costs. The Okanogan-Wenatchee has been one of the leading Forests in utilizing DxP and most projects on the Forest are now successfully utilizing this tool.

8. Due to the high risk of wildfire in the local area and in the Wildland Urban Interface, AFRC strongly recommends using shaded fuel breaks along routes that are ingress and egress into the local area. These fuel breaks should be at least 150 feet on each side of roads and thinned down to 40 sq. ft. of basal area.

9. Throughout the document there is reference to cumulative impacts on resources when performing needed treatments. AFRC reminds the Forest that cumulative impacts are no

longer required to analyze under the Department's new regulations. You should remove all references of this in your final document to reduce the threat of possible litigation.

10. To supplement your record, we would like the District to review and consider in this and future projects a new study published by Johnston et. al that focuses on the benefits of mechanical thinning in regard to wildfire mitigation.

Johnston, James D., Olszewski, Julia H., Miller, Becky A., Schmidt, Micah R., Vernon, Michael J., Ellsworth, Lisa M. Mechanical thinning without prescribed fire moderates wildfire behavior in an Eastern Oregon, USA ponderosa pine forest. *Forestry and Ecology*. 501 (2021) 119674

Key points of the Johnston paper include:

- Mechanical thinning can moderate fire behavior in the absence of prescribed fire.
- Modeled crown fire potential declined immediately following thinning, undoubtedly due to significant reductions of ladder fuels that carry fire into the crown and crown density that facilitates spread between crowns.
- Increase in surface fuel and modeled fire behavior was offset by a steady decline in litter and a dramatic decline in duff over time
- Fuel loading in a dry ponderosa pine forest increased for a year or two after thinning and then declined.
- Woody fuel particles increased somewhat following thinning but litter and duff fuel loading declined dramatically as a result of thinning.

Furthermore, the following studies should also be incorporated to illustrate the scientifically proven benefits following thinning and density reduction treatments.

Van Mantgem, P.J., Falk, D.A., Williams, E.C., Das, A.J. and Stephenson, N.L. 2018.
Pre-fire drought and competition mediate post-fire conifer mortality in western U.S. National Parks. Ecological Applications, 28(7), 1730-1739.

- Thinning treatments can improve forest resistance to wildfire

Fettig, C.J., Klepzig, K.D., Billings, R.F., Munson, A.S., Nebeker, T.E., Negrón, J.F. and Nowak, J.T. 2007. The effectiveness of vegetation management practices for prevention and control of bark beetle infestations in coniferous forests of the western and southern United States. Forest Ecology and Management 238, 24-53.

- Factors involving tree density are consistently associated with the occurrence and severity of bark beetle infestations. Management to reduce stand or landscape level susceptibility to bark beetles must address factors related to tree density.
- Thinning's effectiveness as a preventative measure to reduce the amount of bark beetle caused tree mortality is supported by the scientific literature.

Hood, S.E. 2017. Radial and stand-level thinning treatments; 15-year growth response of legacy ponderosa and Jeffrey pine trees. Restoration Ecology, 1-7.

- Shade-intolerant old trees can respond to density-reduction treatments. Stand thinning caused an immediate, sustained increase in BAI compared to radial thinning and unthinned stands in large, old ponderosa and Jeffrey pines.
- Thinning seemed to mitigate the effects of extreme drought conditions that occurred the year after treatment, such that growth reductions were much less than the control and radial thinning trees.

Bradford JB, Bell DM (2017) A window of opportunity for climate-change adaptation: easing tree mortality by reducing forest basal area. Frontiers in Ecology and the Environment 15:11–17

- Reducing forest basal area can decrease tree competition, which may reduce drought-induced tree mortality.

Latham, P. and Tappeiner, J. 2002. Response of old-growth conifers to reduction in stand density in western Oregon forests. Tree Physiology 22, 137-146.

- Cutting trees to reduce density in old-growth stands or to modify the amount and distribution of fuels can be beneficial to residual large old-growth trees.
- Reduction of stand density around individual trees with full crowns is likely to increase the basal area growth of a high proportion of the trees for several decades.

McDowell, N., Brooks, J. R., Fitzgerald, S. A. and Bond, B. J., 2003. Carbon isotope discrimination and growth response of old Pinus ponderosa trees to stand density reductions. Plant, Cell & Environment, 26: 631–644. doi: 10.1046/j.13653040.2003.00999.x.

- The growth and physiology of old ponderosa pine trees are responsive to stand density reductions and have the potential to increase growth dramatically after these reductions.

Thank you for the opportunity to provide Draft EA Comments for the Eagle Creek Project. We look forward to its expedited implementation.

Sincerely,

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