# Conservation Northwest Comment Letter for the Eagle Creek Project Draft Environmental Assessment

April 14, 2026

Okanogan-Wenatchee National Forest
Wenatchee River Ranger District
c/o District Ranger Erica Taecker
600 Sherbourne St.
Leavenworth, WA 98826

Dear Ms. Taecker,

I am writing on behalf of Conservation Northwest and its members to voice our support, concerns, and recommendations for the draft environmental assessment (EA) of the Eagle Creek Project. We support and commend the re-evaluation of the proposed landscape after the 2025 Lower Sugarloaf Fire impacted sites proposed under the Chumstick to Lower Peshastin Project. Thank you for requesting input on the Eagle Creek Project and for hosting a community meeting during the phases of project development.

Conservation Northwest protects, connects, and restores wildlife habitat across Washington and British Columbia. We have been actively involved in forest management on the Okanogan-Wenatchee National Forest (OWNF) for over 30 years. Our organization has a long history of enhancing habitat and populations of culturally significant and at-risk species. We support ecosystem-based management approaches and recognize the Okanogan-Wenatchee Forest Restoration Strategy as the best guidance for implementing the best available science to create resilient forests for wildlife, wildfire, and climate change.

Conservation Northwest supports restoring departed forest conditions in the Chumstick region since our organization's participation in the North Central Washington Forest Health Collaborative. The following recommendations were developed from meetings, field visits, and monitoring conducted by Conservation Northwest and its partners across the OWNF and Central Washington Initiative. Please include our recommendations to improve habitat for culturally important and at-risk wildlife in the Final EA.

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## Dwarf Mistletoe

Conservation Northwest supports reducing dwarf mistletoe in fire-excluded forests dominated by Douglas-fir, ponderosa pine, and larch if prescriptions lower the risk of infection at the landscape level while maintaining sufficient dwarf mistletoe features for at-risk wildlife. The OWNF repeatedly misinterprets the Hawksworth rating scale and the recommended prescriptions for dwarf mistletoe infection. Dwarf mistletoe is a significant habitat feature for northern spotted owl, western gray squirrel, northern flying squirrel, great gray owl, American goshawk, evening grosbeak, and dusky grouse. Under the proposed Hawksworth rating system, individual trees with dwarf mistletoe infections will be removed but dwarf mistletoe will remain present in all units.

We recommend following the complete Hawksworth recommendations for reducing dwarf mistletoe densities. Implementing the Hawksworth rating scale without following through on its complete recommendations is a callous use of the tool. Under the Hawksworth recommendations, the OWNF could implement a strategy that identifies the stands and trees where mistletoe is desired for at-risk wildlife species, retain the most infected trees for wildlife habitat, and remove all mistletoe infected trees from stands adjacent to retained, infected trees to decrease the rate of spread. This will improve the heterogeneity of the mistletoe population, while retaining the largest and oldest infected trees that the local public are concerned about, that are valuable to at-risk wildlife, and that cannot be processed by available milling infrastructure.

According to Hawksworth, dwarf mistletoe spreads slowly and individual infections only last 2 to 8 years. Even if a residual tree is infected, it will have minimal impact on the future presence of mistletoe if the prescribed burning proposed is implemented. Prescribed fire may kill infections in retained trees and will reduce or eliminate dwarf mistletoe infection rates in regenerating cohorts of trees. As we have noted in every OWNF project since 2022, we are increasingly concerned with the OWNF's perception that mistletoe can and should be completely sanitized from forests by removing the most heavily infected trees that represent the most valuable habitat for endangered wildlife species.

## Individuals, Clumps, and Openings (ICO)

We support the Eagle Creek Project prescriptions that include language and a desire to retain resilient and complex structure using the ICO (individuals, clumps, and openings)

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method. In contrast with recent projects implemented on the OWNF (South Summit, Mission Project, Twisp Project, and Upper Wenatchee Pilot Project), we recommend retaining more medium to large sized clumps of trees. Conservation Northwest has identified very few medium to large clumps across recently implemented projects. We often observe induvial trees retained for future clumping, instead of retaining existing clumps with connected crowns and roots. The outcome of recent OWNF implementation using ICO resembles shelterwood harvests more than ICO prescription due to the lack of retained clumps.

## Stand Density Targets

It is unclear in the Draft EA how the treatments are designed from the landscape evaluation process. The leave tree densities under the proposed prescriptions are nearly identical to the historical ranges of variability (HRV) and departures identified in the landscape evaluation. Since HRV and departed conditions represent stands with trees two to four times the diameter of the trees present in stands, prescriptions should retain to retain the current available size classes. Until the trees grow larger diameters, prescriptions that immediately reduce the present stand density to historic stand densities will create leave trees vulnerable to wind throw, insects, and drought. Thinning beyond historic ranges of variability will create more dense regeneration that must be noncommercially thinned or burned in the future. We are concerned that prescriptions are trying to achieve historical stand densities at the time of implementation rather than trying to grow trees to meet the size class of trees modeled in departed conditions.

Prescriptions that instantly reduce the present stand densities to historic stand densities do not factor post-harvest mortality. Residual stand density targets must consider post-harvest disturbance that will result in further tree mortality, thus reducing the residual stand density even further. Insects, fungi, diseases, windfall, mechanical damage, and prescribed fire are all forces that will lower the stand densities below the desired density described in the EA. Resource specialists reviewing projects may not have a complete picture of these post-harvest disturbances and may be creating recommendations about future wildlife habitat, plant populations, and soil quality based on a described target density rather than the actual residual density that will be implemented on the ground.

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## Prescribed Burning

Conservation Northwest supports the majority of the proposed burning in the Eagle Creek Project and we are pleased to see the OWNF continue to reintroduce fire to the East Cascade Mountains. We recommend including Late Successional Reserves (LSR) and Managed Late Successional Reserves (MLSR) in burn plans since these forests may have the highest risk of stand-replacing wildfire and the greatest risk to the northern spotted owl. Burning in dense, complex habitat is feasible by burning tree wells in winter or early spring, jackpot burning lightly thinned fuels, or by igniting dot patterns with the use of drones. A combination of fuel thinning treatments and burning will create stand resilience for the purpose of conserving large and old trees in LSR and MLSR.

In addition to expanding the proposal of burned acres to include LSR and MLSR, we recommend identifying and potentially removing brushy and herbaceous zones from proposed burning. In some cases, dry shrubby and herbaceous environments of the sagebrush steppe ecosystem have not recovered from recent wildfires, heavy ungulate browsing, or domestic livestock grazing. These environments are dominated by bunchgrass species and shrubs such as big sagebrush, antelope bitterbrush, and gray rabbitbrush. Cheatgrass and noxious weed invasion should be predicted as a response to prescribed burning in sagebrush steppe where invasive or noxious species are present on the landscape. Please use reasonable discretion to determine which shrubby and herbaceous sites are suitable for burning instead of lumping all non-forest ecosystems into one fuel category.

## Aquatic Improvements

Conservation Northwest supports the proposal to reduce stand densities on the project landscape in order to increase streamflow and potentially affect stream temperatures. The Upper Columbia Salmon Recovery Board (UCSRB) developed the Snow2Flow tool which uses the Distributed Hydrology Soil Vegetation model (DHSVM) to demonstrate streamflow changes resulting from forest thinning. Model results shared for the Eagle Creek HUC 12 by UCSRB estimate thinned forests could increase streamflow after implementation.

The proposal does not include any habitat conservation or enhancement actions for aquatic species, despite identifying project actions that could result in short-term, negative impacts to redband trout and endangered steelhead, bull trout, and Chinook salmon. The aquatic environments within the project area are extremely altered and impaired. The Draft EA

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should identify opportunities to implement aquatic improvements such as culvert replacements, instream woody debris, and utilizing forest residuals for low-tech, processed-based restoration (LTPBR) such as posts and branches for beaver dam analogues. Aquatic improvements are included in recent decisions signed by the Colville National Forest (i.e Buckhorn; Meadow Lakes) using the same emergency authorities as the Eagle Creek proposal.

While road network changes are not proposed, we see a valuable opportunity to improve aquatic conditions affected by roads while resources, attention, and staff are committed to the Eagle Creek project area. We urge the Wenatchee River Ranger District to explore options for remediating aquatic organism passage across road barriers.

In addition to actions, there is a large emergent, forested wetland located at north end of Commercial Unit 651 that should be identified and protected in the Draft EA by a buffer that excludes or limits harvest adjacent to the wetland. Wetlands may be present in other sites of the project area and should be identified and buffered before implementation.

Thank you for the opportunity to share our recommendations for the Eagle Creek Project. We are hearted to see OWNF leaders continue to engage communities and partners as much as they are permitted under the current federal direction. We hope to continue sharing knowledge and resources with one another to create better outcomes for forests and wildlife in Pacific Northwest.

Sincerely,

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