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Title:
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Kelly Lawrence

Naches District Ranger

Okanogan-Wenatchee National Forest

10237 Highway 12 Naches, WA 98937

Dear Kelly:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Little Crow Restoration Project.

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber 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 adjacent to the Okanogan-Wenatchee National Forest. For example, Hampton mills in Morton and Randle are ready to take significant volumes of wood from the Forest. The management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The Forest Products sector in Washington provides around 40,000 direct and 100,000 indirect jobs. Many of these are found in rural communities, such as those adjacent to the Okanogan-Wenatchee NF. Wages paid, income taxes, and other monetary transactions generated by these businesses and family-wage jobs substantially contribute to the infrastructure and well-being of the local communities.

Lack of supply of raw materials to fill manufacturing demands for wood products continues to be an issue in Washington. In the last 24 months, there have been eight mill closures in Western Washington partly due to lack of access to logs. Vegetation management projects on the Okanogan-Wenatchee, including the Little Crow Project, can help contribute to a predictable wood supply in Washington that many mills, both in Washington and Oregon, depend on to continue operations and sustain their work force. The opportunity to competitively bid on future volume offerings from this EA will help to assure the milling infrastructure continues to provide an outlet for commercial products developed through these types of projects.

The Little Crow Restoration project area includes approximately 56,871 acres of National Forest System lands located in the southern portion of the Little Naches watershed and includes the Crow Creek and Lower Little Naches River subwatersheds. AFRC supports both the Purpose and Need for this project. The overall purpose of the proposed Little Crow Restoration project is to increase forest resiliency, restore aquatic resources, and maintain public access within the larger context of the Little Naches watershed. The needs for the project include:

* ? Accelerate the development of a sustainable vegetative structure, composition, and pattern, which will allow for natural processes to function.

* ? Improve hydrologic function and water quality by reducing storm water drainage connectivity from roads and trails to the stream channel network.

* ? Restore stream habitat conditions to contribute towards long term recovery goals of listed fish species.

* ? Provide for an economically and environmentally sustainable transportation system that maintains public access for recreational opportunities, special uses, and other traditional and non-traditional Forest use in the context of vegetative and watershed health.

AFRC strongly supports the Modified Proposed Action and would like to compliment the Naches Ranger District for reaching out to so many interest groups to help develop the proposed action. These comments are made on the basis of field trips made by AFRC staff to the project area, review of the Modified Proposed Action, and from attending the open house held on November 17 where District staff outlined the project in detail.

Based on the information contained in this environmental analysis, the Naches District Ranger will make the following decisions:

* ? With respect to the purpose and need to increase forest resiliency.
* ? With respect to the purpose and need to restore aquatic resources.
* ? With respect to the purpose and need to maintain public access.
* ? What project design features, mitigation measures, and monitoring should be implemented that will best ensure the protection and enhancement of resources such as late successional habitat, riparian habitat, visual quality, recreation use, and various resource needs, objectives, and desired future conditions within the project area?

AFRC would like to offer the following recommendations to help with framing the final implementation of the project.

1. First AFRC suggests that the economics section of the project analysis should be strengthened by highlighting the importance of maintaining the local logging and milling infrastructure which will actually be doing the treatments on the ground. The volume of timber removed from this project will create many jobs in rural communities within the bounds of the Okanogan-Wenatchee National Forest and outside of the Forest[rsquo]s boundaries. For every million board feet of timber harvested

approximately 12 jobs are created. Several milling facilities have left communities surrounding the Okanogan Wenatchee National Forest in recent years due to lack of adequate log supply. It should be noted that projects like the Little Crow will help maintain those milling facilities still in place that depend on wood from the Forest and will also help support the existing logging infrastructure.

2. As pointed out, many of the stands in this Project area are at risk to uncharacteristically large wildfires and attack from insects and disease. The Forest should commercially treat the maximum acres within the 56,936 acre project area to fireproof these stands and make them more resilient to insect and disease outbreaks. AFRC believes that more work could be done to enhance the habitat for northern spotted owl, white-headed woodpecker, three-toed woodpecker and black-backed woodpecker. Considering the implied urgency for minimizing catastrophic wildfire in this landscape, it would stand to reason maximizing the treated acres is in the best interest of the wildlife, water quality, and the economic benefits this project is intended to protect-- all of which support the Purpose and Need.

We are challenged to determine the exact number of acres proposed for commercial treatment. Chapter 1 pg 1-9 states: "Within the project area, there is a potential to treat 6,500 acres with commercial harvest to provide for resilience of forest vegetation to insects, disease, and uncharacteristic wildfire." However, Table 2-2 lists the maximum potential mechanical (we assume this means commercial) treatable acres to enhance large and old tree development as 10,081 acres. The table then identifies a total of 3,544 acres "presently delineated for commercial treatment." Additionally Table 2-2 references Appendix D, Figure D3. We were unable to locate on the FS website Appendix D but did find a map labeled Figure D3, which we assume is the figure referenced in Table 2-2. Unfortunately, while this map is great for identifying the habitat treatment locations, it does not clearly identify locations of commercial treatments. For northern spotted owl treatment areas we found similar apparent discrepancies. Table 2-2 identifies a potential to treat and enhance 6,317 acres, but lists only 2,501 acres compared to the 2,990 acres found on page 1-9. The acres being considered for white headed woodpecker habitat enhancement show similar variances between Table 2-2 and the figures found on page 1-9. AFRC urges the Forest to provide clearer accounting of the location and total acres planned for commercial treatment. Also, please include an explanation of the differences between Table 2-2 acres "Presently Delineated Commercial Treatment" and the acres listed on page 1-9 for commercial treatment.

3. AFRC further suggests that in those areas being treated for fire resiliency, and for enhancement of large and old tree development, that thinnings be conducted that will significantly reduce the basal area and crown closure in the stands. Since this project area will probably not be entered for at least another two decades, the stands should be thinned to a spacing that will provide for maximum growth and forest health for at least that time.

4. AFRC supports thinning of overstory with prescribed fire on 1,651 acres which will increase sunlight reaching huckleberry plants and reinvigorate existing stems resulting in larger fruit production. Reduced canopy cover will also create conditions where huckleberries can expand their existing footprint. Again, AFRC recommends thinning to the widest possible opening sizes to promote huckleberry growth and production.

5. Other main purposes and needs of this project include to improve hydrologic function and water quality, restore stream habitat conditions and aquatic organism passage, and provide for an economically and environmentally sustainable transportation system. AFRC applauds the District for revisiting the issue of road decommissioning, road closure and road relocation as it applies to stream and aquatic issues. AFRC asks that one final assessment be given before the final decision to decommission 24.4 miles of system road, close (storm proof) 39 miles of system road and decommissions 10 miles of unauthorized road is made. The Forest has invested millions of dollars in its road system and AFRC would prefer to see roads stored by gating or by berms rather than by decommissioning or obliteration. As identified in the EA (H-2) "To spend money to destroy real property only to spend more money to replace the same infrastructure a few years later is not good stewardship of resources." Should access be needed in the future for fire, or harvest, those roads could be reactivated. Included in this assessment should be a prioritization of work to be completed, including fish passage enhancement. This would assist stakeholders in understanding locations of high priority work especially that which will increase access to currently blocked fish habitat.

6. We are very concerned about the inappropriate discussion of "proposed" wilderness in the EA, and request that it be deleted. The discussion starting on Page 3-294 under "Proposed Wilderness Areas" is inappropriate application of the 2012 Planning Rule to inventory wilderness at a project level. In January 2014, the Forest Service issued directives regarding the implementation of the 2012 Forest Planning Rule. These directives are specifically directed to be used at a Forest Planning level and are not designed to be used at a project level. Chapter 70 of these directives specifically deals with areas of wilderness characteristics and the process that the forests need to utilize in order to properly evaluate potential wilderness on a forest-wide scale. These directives outline a series of steps that the Forest Planners must utilize to evaluate administratively recommended wilderness at the forest plan level. These steps include intensive public involvement that should be happening

during the four stages, inventory, evaluation, analysis, and finally recommendation. The draft EA inappropriately applies a small portion of these directives, Chapter 71.1, was applied to the Little Crow project. The wilderness evaluation process was designed to be applied as a whole process, at the plan level, and include extensive

public discussion and scrutiny. Specifically, the Forest Service Handbook (FSH) section referring to the wilderness inventory process is titled "Land Management Planning" FSH 1909.12. It states in its heading: "This handbook provides procedural guidance for implementing land management planning direction for the 2012 planning rule. [hellip]The primary use is for interdisciplinary team members and line officers responsible for planning." FSH 1909.12, Zero Code, at 1. The handbook further refers to its application to "the process by which lands are recommended during land management planning." FSH 1909.12 ch 70, [sect] 70.6. Under the planning rule, one of the elements of plan revision is to "[i]dentify and evaluate lands that may be suitable for inclusion in the National Wilderness Preservation System and determine whether to recommend any such lands for wilderness designation." 36 C.F.R. [sect] 219.7(c)(2)(v). As stated in the Forest Service Handbook, "Inclusion in the inventory is not a designation that conveys or requires a particular kind of management." FSH 1909.12, ch. 70 [sect] 71. Thus, areas are not subject to additional management direction or requirements unless and until they are actually recommended for wilderness designation in a final Forest Plan. And, of course, only Congress can designate wilderness under the Wilderness Act. Additionally, at least for roadless areas under 5,000 acres, statutory language directs the Forest Service to manage lands for multiple use until further Congressional action or a Forest Plan revision. In the Washington Wilderness Act, Congress directed that National Forest lands not designated as wilderness, including all roadless areas less than 5,000 acres, "shall be managed for multiple use in accordance with [Forest Plans]." Washington Wilderness Act, Pub. L. No. 98-339, [sect] 5(b)(3), 98 Stat. 299 (1984). By improperly applying the wilderness inventory process at a project level, the Forest Service did not undergo the extensive public engagement required to implement this process and in doing so implied that portions of this project qualify as areas with wilderness characteristics despite the fact that these areas have not undergone the additional scrutiny required by the directives. It was inappropriate for the Forest Service to designate, and then analyze in its EA, areas potentially suitable for inclusion in the national wilderness system. The final EA and Record of Decision should delete all such references.

7. Finally, AFRC believes that analyzing this project using an EA is appropriate since no significant impacts will occur due to operation of the project. The project will improve forest health and reduce the threat of catastrophic wildfire while improving hydrologic functions and water quality, restore stream habitat conditions and aquatic organism passage, and provide for an economically and environmentally sustainable transportation system.

Thank you for the opportunity to provide comments on the Little Crow Restoration Project. I look forward to following the implementation of this project as it moves forward.

Sincerely,

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