



1829 10<sup>th</sup> Ave W, Suite 201  
Seattle WA 98119  
[www.conservationnw.org](http://www.conservationnw.org)

Jodi Leingang  
Naches Ranger District  
10237 Highway 12 , Naches, WA, 98937  
[jleingang@fs.fed.us](mailto:jleingang@fs.fed.us)

December 6, 2016

Dear Jodi,

I am writing to provide comments on the Little Crow Restoration Project Environmental Assessment, these comments build upon our previous scoping comments and engagement directly with your district through the Little Naches Working Group affiliated to the Tapash Sustainable Forest Collaborative. I have participated in this working group since its inception, and acted as lead of our wildlife subgroup. Our organization strongly supports the focus of resources on ecological restoration of the Little Naches watershed, and we support the current Purpose and Need for action of the Little Crow project. Our support for the final Little Crow project decision (in addition to the issues we raise in this letter) will be contingent upon the assumption that it is only a first-step to restoration in the Little Naches watershed that the district has committed too recognizing that many terrestrial and aquatic restoration needs identified by project partners in the Little Naches Working Group are not addressed in this project and therefore require continued work going forward after a decision. These actions include multiple non-commercial actions: plantation tree-thinning in likely non-commercial stands, meadow and floodplain restoration (including the 1900 road), road restoration/relocation/maintenance level changes, and recreation planning. We intend to continue working through the Little Naches Working Group and with your district to ensure that these restoration discussions for the whole watershed continue. We have appreciated the quality discussions and information that this collaboration has produced to date, and understand that for multiple reasons restoration in this watershed can occur in staged components with the Little Crow being a first step.

Specific to this first step towards restoration in the watershed in the Little Crow project, we submit the following feedback to the analysis present in the Environmental Assessment:

- We appreciate and support the seasonal closure of the 1921 road to increase seasonal habitat security for wildlife. Associated habitat restoration of the early seral habitat and meadows adjacent to this road will be important to conduct in association with gating the road and

education/enforcement of the closure, and we hope to work closely with your district and partners to do this work early on in implementation.

- We appreciate the added clarity around meadow restoration and aquatic restoration actions in the EA in complement to the vegetative treatments including the ability for active restoration in the early seral stand and meadows mentioned above.
- In the wildlife analysis section, the EA states that fishers do not need to be analyzed for the project because “Pacific fisher populations in Washington were thought to be extirpated, or contain only remnant scattered individuals (Aubry and Lewis 2003, Lewis and Stinson 1998). Fisher on the Okanogan-Wenatchee National Forest are believed to be currently absent” (USDA Forest Service 2015).” This statement should be edited to recognize the recovery efforts underway in Washington’s Cascade mountains to re-establish a population that began in winter 2015 with the release of 23 fishers and that is already underway again this winter with additional releases. One individual was recorded by remote camera just east of Bumping Lake, and therefore will soon be relevant to future efforts of in the Little Naches. Habitat created in this project will be important to their recovery over time in the Cascade mountains. The EA should simply recognize the recovery efforts, [http://wdfw.wa.gov/conservation/fisher/cascade\\_publications.html](http://wdfw.wa.gov/conservation/fisher/cascade_publications.html)
- We support the clear diameter limits consistent with the forest’s Large and Old Tree Policy and Forest Restoration Strategy to maintain and restore large and old trees on the landscape, which are deficient and important to a wide range of wildlife. Some additional comments from reviewing the EA:
  - Why do the diameter limits change between the Late Successional Reserves and Matrix land allocations? The Forest Restoration Strategy states that for the Matrix, “Historically, the emphasis for general forest and matrix was on timber production, maximized for the former and programmed for the latter. However, traditionally implemented production forestry is generally inconsistent with fire, endangered species, and restoration objectives. Consequently, these areas are now considered with the rest of the landscape and any treatments that are proposed are guided by restoration principles.” What is the restoration principles rationale for the larger diameter limit for removal of trees in the Matrix land allocation?
  - The BMP’s for the project state that “Trees exceeding 25 inches DBH (20 inches DBH in the Late-successional Reserves) may be designated for removal by the Forest Service if the Timber Sale Administration official determines that removal is necessary to provide safety and/or improve functional operational capabilities.” As a specific purpose of this project is to promote their existence and resiliency on the landscape, all trees removed in these cases that are not analyzed up front for their removal as part of this EA and consultations, should remain on site as down wood or utilized in restoration efforts (down wood added to early seral meadows, visual closure of restored roads, aquatic restoration). These trees should not be removed with commercial value, and should be quantified for the project record including where they were used by the TSA.

- Road miles targeted for decommissioning (system and unauthorized) not necessary for vegetation treatments should be identified, prioritized, and timed for restoration prior to construction of temporary roads to offset increases in road density during project implementation. Temporal impacts to wildlife and natural resources as analyzed in the EA not only matter, they can be mitigated by the upfront timing of mitigation. This practice has occurred on the Okanogan-Wenatchee NF, where road miles targeted for decommissioning that are not necessary for the vegetation treatment are addressed prior to increased disturbance through construction of temporary roads. The EA states that temporary roads will be open 1-3 years after their reconstruction, while the overall project, and that “There would be a short term increase in road density and minor loss of security habitat during project implementation.” Consistency with the Aquatic Conservation Strategy is measured not only as an end-result of a project, but that the principles of no-net are considered temporally through project implementation. In a Tier 1 key watershed, CFLRA funded landscape, watershed identified for risk due to high road density’s in its current condition, and focus of robust collaboration – the timing of impacts can and should be mitigated by complementary restoration in the watershed. The district should identify of the 36.24 miles (1.84 miles of Forest Service System roads are proposed for closure, 24.4 miles are proposed for decommissioning, 10 miles of unauthorized roads proposed for decommissioning) which ones will not be utilized for vegetation treatment and which miles are available and to be prioritized for decommissioning as soon as the decision is signed.
- We remain uncomfortable with the analyzed unauthorized roads in the project area that the Little Crow project does not make a decision on, as they will remain illegal to ride. We are disappointed the surveys were not completed to include a decision on these roads in the Little Crow Project but the decision should consider temporary signage for these road segments as they are surveyed in 2017 to inform a future decision. Illegal usage and creation of roads and trails has been documented in this watershed, and implementation of the Little Crow project is an important step towards moving to a sustainable and responsible recreation system that includes informing the public of which roads are not legal to utilize.
- Our wildlife subgroup of the Little Naches Working Group highlighted the importance of snags on this landscape for wildlife, as well as the documented removal of valuable snags for wildlife by illegal and legal firewood removal. We appreciate this issue being addressed in project design for prescribed burning and increased monitoring of firewood collection, but have several remaining concerns following review of the EA:
  - The EA states “Vegetation management treatments within all wildlife habitat types, could result in a reduction of snags on up to 11,744 acres (or 24%) of potential habitat for PCE within the project area and Table 3-110 speaks to a reduction of up to 30 percent of snags over 20 inches dbh from mechanical treatments. Large snags of this size provide tremendous benefits to wildlife, and are the dead wood that will fall to provide future benefits to aquatic systems, water retention, soil health, and continued habitat for wildlife. Are mechanical treatments including prescriptions that target the removal of snags, or is this total an assumption of snags to be

removed for safety, operations, and hazard tree removal? If they are targeted by mechanical treatment, an ecological rationale needs to be explained. If they are assumed to be removed by operations and safety reasons, please specify those marked for hazard removal along roads versus those within units for operations. For those within units for operations, we strongly advise that these snags are not pre-marked by the district but rather left to the discretion of the operator in the field.

- The BMP's for "Project Design Features for the Removal of Down and Dead Trees" should clearly prohibit the felling of snags in the project area and only allow the collection of downed wood and material throughout project implementation. If any standing dead trees are allowed to be removed in these areas, a scientifically supported diameter cap should be placed on this removal.
- In the review of the EA I did not see future restoration actions that would impact recreational assets, benefit natural resources, and impact the watershed mentioned in the cumulative impacts as a "reasonably foreseeable action". Reasonably foreseeable actions are those for which there are existing decisions, funding, formal proposals, or which are highly probable, based on known opportunities or trends. Although you cannot quantify the exact impact from actions we have not taken yet, it would be important to disclose to the public and to show commitment to the collaborative that additional work will occur in this watershed that will impact these resources. Projections are made about additional ATV trail mileage, hazard tree removal, and other resources. A mention of ongoing ecological restoration planning and implementation in coordination with the Little Naches Working Group is fitting.

Thank you for consideration of these comments in addition to those we have made through collaborative meetings to date, in communications directly with your staff, and through the Little Naches Working Group Pre-Scoping Report and our scoping comment letter. We have truly valued the relationships and increased understanding of the watershed through collaboration to date, and we look forward to continued engagement in restoration in this watershed.

Sincerely,

A handwritten signature in black ink that reads "Jen Watkins". The signature is fluid and cursive, with a long horizontal stroke extending from the end of the name.

Jen Watkins

Conservation Associate

[jwatkins@conservationnw.org](mailto:jwatkins@conservationnw.org)