February 11, 2021

Jeffrey Rivera

Okanogan-Wenatchee National Forest

Wenatchee River Ranger District

c/o Paul Kelley

600 Sherbourne St.

Leavenworth, WA 98826

Submitted to: <https://cara.ecosystem-management.org/Public/CommentInput?project=49124>

Dear District Ranger Rivera:

On behalf of The Wilderness Society (TWS), we thank you for the opportunity to comment on the draft environmental assessment (EA) for the Upper Wenatchee Pilot Project. TWS is a national non-profit environmental organization dedicated to uniting people to protect wild places. As you know, we are an active participant in the North Central Washington Forest Health Collaboration (NCWFHC) and have been involved in several recent forest restoration projects in the Okanogan-Wenatchee National Forest.

Our review of the Upper Wenatchee EA has focused primarily on the project’s consistency with the Northwest Forest Plan, the Roadless Area Conservation Rule, and the Okanogan-Wenatchee Restoration Strategy. As discussed below, we have some questions, concerns, and compliments about the Upper Wenatchee project’s compliance with these three important Forest Service policies.

**I. Northwest Forest Plan**

First, we question whether an amendment to the Northwest Forest Plan (NWFP) is truly needed to allow harvest of trees over 80 years within the Upper Wenatchee area’s Late Successional Reserves. As pointed out below, the Plan’s prohibition on cutting 80-year-old stands applies specifically to forests located on the westside of the Cascades – not to the Upper Wenatchee area in the Okanogan-Wenatchee National Forest, which is located entirely on the eastside of the Cascades.

The EA apparently assumes that the NWFP’s 80-year standard applies to the LSRs in the Upper Wenatchee area:

“The proposed actions … may require a project-specific amendment that would allow the project to meet habitat restoration and risk-reduction objectives. Specifically, a project-specific amendment would be required to amend the NWFP silviculture standard that prohibits harvest of trees in stands over 80 years old in LSRs (USDA Forest Service, 1994a: C-12). The amendment would allow treatment in stands that are over 80 years old to restore forests for wildlife species associated with old-forest open-canopy habitat conditions ….”[[1]](#footnote-1)

However, the NWFP clearly states that the 80-year standard strictly applies only to LSRs on the westside of the Cascades and that some timber harvest in stands older than 80 years is allowed in LSRs east of the Cascades. Following are the relevant excerpts from the NWFP regarding silvicultural activities in LSRs:

“Activities permitted in the western and eastern portions of the northern spotted owl’s range are described separately below….

**West of the Cascades** – There is no harvest allowed in stands over 80 years old….

**East of the Cascades** … - Given the increased risk of fire in these areas due to lower moisture conditions and the rapid accumulation of fuels in the aftermath of insect outbreaks and drought, additional management activities are allowed in Late-Successional Reserves….”[[2]](#footnote-2)

The NWFP encourages the use of thinning and other silvicultural management in eastside LSRs to reduce the risk of large-scale disturbance, such as wildfire. In general, silvicultural activities aimed at reducing risk in eastside LSRs “shall focus on younger stands”; however, activities in older stands are allowed in LSRs where the risk of large-scale disturbance is “particularly high,” which may well be the case in the Upper Wenatchee project area. Regarding these higher-risk LSRs, the NWFP states:

“While risk-reduction efforts should generally be focused on young stands, activities in older stands may be appropriate if (1) the proposed management activities will clearly result in greater assurance of long-term maintenance of habitat, (2) the activities are clearly needed to reduce risks, and (3) the activities will not prevent the Late-Successional Reserves from playing an effective role in the objectives for which they were established.”[[3]](#footnote-3)

Instead of assuming that an amendment to the NWFP is needed to authorize logging activity in older stands, the EA should first evaluate whether large-scale wildfire risk in the Upper Wenatchee LSRs is “particularly high,” and, if so, determine whether risk-reduction logging in older stands would meet the three criteria in the NWFP.

According to the 2012 Planning Rule, the Forest Service should only amend the NWFP when there is a demonstrated “need to change the plan.”[[4]](#footnote-4) Given the existing high wildfire risk in the Upper Wenatchee Project area, it is not clear that a departure from the NWFP is needed to conduct risk-reducing logging activity in the Reserves.

**II. Roadless Area Conservation Rule**

The draft EA lacks adequate information about the potential effects of the project on Inventoried Roadless Areas (IRAs) and whether the project is consistent with the Roadless Area Conservation Rule. The only information provided about IRA management is that an unspecified amount of “non-commercial treatments” will occur in the IRAs for the purpose of ecological restoration and that the project will not build any roads or shaded fuel breaks.[[5]](#footnote-5) Missing is any map showing the location of the IRAs in the project area and where the non-commercial treatments would occur within the IRAs, as well as any specific information about what types of tree-cutting treatments would be employed.

The Roadless Rule generally prohibits tree cutting in IRAs but provides some exceptions, including an allowance for cutting generally small diameter trees to reduce the risk of uncharacteristic wildfire effects. While the Upper Wenatchee project area may be an appropriate place to utilize this exception, local Forest Service officials will likely need to provide maps and other detailed information about proposed use of the Roadless Rule exception to regional or national agency officials responsible for ensuring compliance with the Rule. This information should also be provided to the public in the final EA.

**III. Okanogan-Wenatchee Restoration Strategy**

***A. Large Trees***

As a member of the North Central Washington Forest Health Collaborative, The Wilderness Society strongly supports the Okanogan-Wenatchee Restoration Strategy because it is a scientifically sound blueprint for restoring eastside forest ecosystems that have ecological integrity and are resilient to climate change. The Restoration Strategy emphasizes the ecological significance of old and large trees and the need for their restoration, saying, “Old and/or large trees are ecologically important to dry and mesic forest ecosystems. There is a lack of old trees on the OWNF. Large trees are most resilient to fire disturbances and provide important habitat functions when live, and as snags or downed wood.”[[6]](#footnote-6)

The Restoration Strategy defines two categories of large trees based on their diameter sizes: “large” trees are ones that are 20-25 inches in diameter, while “very large” trees are greater than 25 inches in diameter.[[7]](#footnote-7) The Draft EA, on the other hand describes “large” trees as those greater than 25 inches in diameter, implying that trees between 20-25 inches in diameter will generally not be retained. For example, the Draft EA states:

“The following broad treatment objectives were identified for terrestrial treatments:

1. Restore Large Tree Structure—Restoration of large (>25-inch-diameter at breast height [DBH]) and old trees applies to all vegetation types and treatments across the planning. Large trees (>25-inch DBH) would mostly be maintained and protected. Stands would be thinned to increase diameter growth rates to more quickly develop this tree structure in areas where they do not currently exist. Old trees that meet the definition described in Van Pelt (2008) would be retained except where these trees could perpetuate root disease spread.”[[8]](#footnote-8)

We strongly urge the Forest Service to use the recommended definition in the Restoration Strategy and protect resilient trees over 20 inches in diameter, except in rare instances where cutting larger trees is environmentally beneficial or necessary for public safety. It is especially important to retain the large ponderosa pine and other fire-resistant tree species.

***B. Road Construction and Decommissioning***

The Restoration Strategy highlights the ecologically harmful effects of roads on both aquatic and terrestrial ecosystems. As summarized in the Strategy:

• Roads affect aquatic environments by blocking fish passage, simplifying stream function, altering sediment delivery, and increasing fine sediment yields.

• Roads and road networks affect wildlife habitats and can result in road-related mortality. Fragmented habitats cause wildlife to avoid, or be displaced from, areas adjacent to roads.

• Generally, as the density of roads increases within a watershed, the quality of aquatic and terrestrial habitats decreases.[[9]](#footnote-9)

The adverse effects of roads are widespread in the Upper Wenatchee planning area, as is well documented in the draft EA. For example, many miles of habitat for Chinook salmon, steelhead, and bull trout are blocked by roads, significantly impairing fish habitat connectivity in the planning area.

We are concerned about the lack of information in the draft EA about the potential impacts of proposed temporary road construction. According to the EA:

“An estimated 42 miles of temporary roads would be constructed as part of this project to facilitate the removal of commercial timber; however, it should be noted that this is a rough approximation pending on-the-ground planning and condition-based implementation. These proposed temporary roads are typically short lengths of road that would extend existing roads to allow access to nearby treatment units and are located throughout the Project area.”[[10]](#footnote-10)

The draft EA contains maps showing the location of temporary roads in relation to wolf and grizzly bear habitat.[[11]](#footnote-11) However, there is no map or analysis of temporary roads in relation to soils with “severe erosion hazard,” which cover a considerable amount of the planning area.[[12]](#footnote-12)

Given the significant impacts on soils and aquatic resources that could result from approximately 42 miles of temporary road construction, we think it is important to analyze and disclose those impacts. If that is not feasible to do because of the condition-based approach of this EA, then the Forest Service should commit to conducting supplemental NEPA analysis prior to project implementation, when the specific amount and location of temporary road construction within the project area are better understood.

Finally, we strongly support the proposed road decommissioning (64.6 miles) and road closure (13.9 miles) in the action alternatives. Together, these road remediation activities would reduce the total road density in the planning area from 3.1 miles to 1.8 miles per square mile, resulting in impressive long-term improvements in the integrity of aquatic and terrestrial habitats, as recommended by the Restoration Strategy.

We are glad to know that “there is a requirement for ‘no net loss’ of bear Core Areas within the Forest; therefore, proposed road decommissioning would be conducted prior to or concurrently with the construction of temporary access roads to negate the potential for increased road densities within affected bear Core Areas.”[[13]](#footnote-13) We recommend that the Forest Service apply the same “no net loss” approach throughout the planning area and require that road decommissioning occur prior to or concurrently with any temporary road construction.

Thank you for considering The Wilderness Society’s comments.

Sincerely,

Megan Birzell

Washington State Director

Mike Anderson

Senior Policy Analyst

1. EA, p. 1-17. [↑](#footnote-ref-1)
2. NWFP, Standards and Guidelines, p. C-12 (emphasis added). [↑](#footnote-ref-2)
3. Ibid., p. C-13. [↑](#footnote-ref-3)
4. 36 CFR 219.13(b)(1). [↑](#footnote-ref-4)
5. EA, p. 3-198 and 3-199. [↑](#footnote-ref-5)
6. OWNF Restoration Strategy, p. 31. [↑](#footnote-ref-6)
7. OWNF Restoration Strategy, p. 103. Notably, Washington DNR uses three tree size classes to evaluate forest structure and composition in its eastside forest health landscape assessments: large trees are greater than 20 inches, medium trees are 10-20 inches, and small trees are less than 10 inches in size. See WA DNR, Forest Health Assessment and Treatment Framework, p. 27. <https://www.dnr.wa.gov/publications/rp_2020_fh_report.pdf>. [↑](#footnote-ref-7)
8. EA, p. 2-2. [↑](#footnote-ref-8)
9. OWNF Restoration Strategy, p. 31. [↑](#footnote-ref-9)
10. EA, p. 3-183. [↑](#footnote-ref-10)
11. EA, p. 3-78 and 3-82. [↑](#footnote-ref-11)
12. EA, p. 3-141. [↑](#footnote-ref-12)
13. EA, p. 3-81. [↑](#footnote-ref-13)