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First name: Sarah
Last name: Kliegman
Organization: Okanogan Highlands Alliance
Title: co-Executive Director
Comments: [Text copied from attached letter to facilitate comment analysis.]

August 12, 2020

RE: "Comments on the Okanogan-Wenatchee National Forest's proposal to amend specific standards and guidelines in the Okanogan Land and Resource Management Plan that address management of Forest Plan Old Growth and vegetative cover used by deer."

Dear Kristin Bail,

Okanogan Highlands Alliance (OHA) is happy to provide comments on the Okanogan- Wenatchee National Forest's proposal to amend specific standards and guidelines in the Okanogan Land and Resource Management Plan that address management of Forest Plan Old Growth and vegetative cover used by deer. OHA is a public interest conservation organization that serves the Okanogan Highlands area of the Tonasket Ranger District and beyond. Our mission is to encourage and support education and public participation in decisions involving the integrity, sustainability, and prosperity of our community and the environment. OHA fosters conservation of natural resources and takes action to prevent environmental degradation.

We appreciate your efforts to keep the forest plan current and to adapt to new information and changing conditions. Understanding that the changes are discretionary, we have concerns about the changes, and the fact that these amendments, which may have significant impact forest wide, are proposed to be categorically excluded from further NEPA. Your letter states that "the effects of the amendments have been analyzed multiple times" and for that reason "additional analyses in an Environmental Assessment are not warranted." These statements neither provide a record nor sufficient rationale to exclude the current proposals from environmental review. Further analyses on the proposed amendments should be done to avoid inadvertent damage to the few remaining old growth stands on the forest. It would be tragic if these unique ecosystems were irreparably damaged because of failure to do the analysis, especially considering the unique characteristics of old-growth as a repository of ecological record and a refugia for flora and fauna that can be found nowhere else.

One of OHA's strategies to protect the environment is to help educate the public by creating opportunities for people to get out into nature and learn about what they find there. We frequently bring groups onto the National Forest in the Okanogan Highlands on field trips with experts. Recently we had a forest ecologist on such a walk who wanted to bring the group into an old growth stand to explain some of the characteristics of the natural system that could be found therein. Unfortunately, there was none to be found within a reasonable distance from Tonasket in the Okanogan Highlands. We are concerned that the proposed amendments will result in new levels of degradation of an incredibly special and already rare public resource: old growth forest stands.

While there may be an old growth stand that might require treatment, it should be considered only after analyzing the site-specific resource issues and analyzing all other reasonable alternatives. Project-specific amendments to the forest-wide standards and guidelines allow for this eventuality. However, if each old growth stand on the Tonasket and Methow Ranger districts were managed according to the proposed amendments to the Forest Plan, the result would be significant, long-term environmental damage. We suggest that the general, forest-wide standards and guidelines maintain a strict standard of care, as the existing standards and guidelines do, and that any loosening of the standards be scrutinized and approved on a small, site-specific level.

Further, your letter about the proposed changes comes with a map that designates various management types throughout the Tonasket and Methow Ranger District service areas, but is not specific when describing the lands that could be impacted by the proposed changes. An amendment that changes how old growth will be managed should include detailed maps with all the old growth areas indicated so that you and the public can assess the scope of the proposal.

To summarize, a categorical exclusion for this programmatic change is not warranted and is not in the best interest of the public. The proposed amendments should at least be analyzed in an Environmental Assessment (EA). In order to make an informed decision on how to proceed, the EA should consider the historic range and how much old growth forest is left. Complete maps should be included to illustrate the impacts of the proposal and the specific treatments that would be allowed. Protection of old growth stands, which are rare and sensitive remnants of a forest that was at one time dominated by old growth, should be prioritized over easing restrictions on treatment and timber harvest on a forest-wide scale.

Forest Plan Old Growth

While OHA shares the goal to maintain healthy forests in a fire-dependent landscape, we are concerned that harvesting marketable timber in an old-growth setting is not designed to improve forest health, given that old growth forests are, by nature, more resilient to fire. An important characteristic of a healthy forest is the diversity of habitats. Undisturbed old growth forests are a critical component, a piece of the mosaic, that make up a healthy forest and should not be open forest-wide to treatment and sale. Allowing commercial timber harvest of any kind in ecologically unique old growth environments should not be allowed.

Fire resiliency is important across the landscape and can be achieved without harvesting commercial timber and firewood in the few and precious old growth stands that remain in the forest. Efforts to improve fire resiliency should be focused on the majority of National Forest lands that are not old growth. The scoping notice does not provide a sufficient explanation of how the change to allow unscheduled timber harvest forest-wide (Standard and Guidelines 5-1) would adapt the plan to improve fire resiliency.

The change that is proposed for Forest Plan Old Growth (changing from not allowing any scheduled or unscheduled timber harvest to not allowing scheduled but allowing unscheduled timber harvest) seems like an attempt to get around NEPA. Furthermore, the scoping notice does not define what unscheduled timber harvest is (although under the amended plan it would be allowed in old growth areas). This change would seem to mean that instead of the public knowing when timber sales are proposed, the public will be left out and not even know that that commercial harvest is going to take place.

If treatments are going to be allowed in old growth, the second proposed change of requiring treatment of natural fuels to maintain old-growth characteristics as described in the definition of "old growth stand" is a critical component. However, we are concerned about the consequences of conducting treatments on old growth stands because of our observations of old growth stands that were treated as part of the Healthy Forest Initiative (which was intended to reduce the threat of wildfires) on the north flank of Mt. Bonaparte (Red Mill Timber Sale). There, the treatment significantly changed the characteristics of the old growth stands so that they are now unrecognizable as old growth and now resemble a mature forest stand since they lack the diversity that is found in old growth stands. The current proposal, while saying man's activity would be subordinate factor, is subjective and fails to describe specifically what activities would be allowed, especially considering that materials generated by treatment may be sold as timber and firewood.

Deer Cover Levels

The purpose of the language in the forest plan for deer cover levels was intended to ensure that timber harvest operations on Forest Service lands satisfy the multiple uses of the forest including uses by wildlife. The changes in this section rely on the scruples of a manager to know and abide by the "historic range of variability" and does not provide specific guidance about what that might be. More specific information is needed to assess the impacts of this proposal such as the inclusion of an appendix of data that includes the historic range of variability for deer cover throughout the forest. We understand that this might be more information than can reasonably be expected in a categorical exclusion, so we believe an EA would be appropriate. It would be much less cumbersome to make amendments on a project specific basis if needed or to provide enough information for the public to understand the impacts on a forest wide basis.

In Conclusion

When the 1989 forest Plan was created, old growth management was an important and controversial subject that involved countless weeks of give-and-take negotiations in a public process that looked at multiple points of view and alternatives. These proposed changes would remove protections that that public process created. The thirty (30) day scoping for the changes proposed at this time of the COVID-19 pandemic is insufficient time to include all the affected and concerned people and agencies. We request an extension of the scoping period so that we can inform more concerned and impacted individuals and groups and you can receive more substantive comments on which to base your decision.

In evaluating the proposed changes, our observations are that: the forest plan amendments seem designed to facilitate timber harvest rather than designed to facilitate fire resiliency, ecological health, and other uses of the national forest. The use of a categorical exclusion for loosening restrictions on treating and logging of old-growth, which would cause significant environmental impacts, is inappropriate and unacceptable.

We respectfully request that you either drop the proposed amendments, or conduct thorough environmental assessments of the proposed changes to the forest plan. Leaving the forest plan as is with respect to old growth and deer cover, and making management decisions on a project-by- project basis would facilitate responsible stewardship of our public lands and demonstrate that the Okanogan-Wenatchee National Forest is, indeed, "Caring for the Land and Serving People."

Sincerely,

Sarah Kliegman and Jen Weddle Okanogan Highlands Alliance co-Executive Directors

David Kliegman

Okanogan Highlands Alliance Senior Advisor