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Comments: Comments on the Upper Swauk Project NOFA

These are staff-level comments of Alex Conley, Executive Director of the Yakima Basin Fish and Wildlife Recovery Board. Due to the short comment period, the Board of Directors has not reviewed the proposal or these comments.

- 1) The overall goals and direction of the project are important; if properly implemented this project will make a strong contribution towards forest and aquatic habitat restoration at a landscape scale that implements many actions prioritized in the Yakima Steelhead Recovery Plan.
- 2) The proposal includes a number of aquatic restoration activities that should be beneficial but does not include the detail needed to evaluate specific activities. The EA should go beyond dots and lines on a map to describe where and how these activities will be implemented so that they can be fully evaluated.
- 3) The proposed action includes more significant harvest and thinning in riparian reserves than has been proposed in other recent projects in the Yakima Basin. The EA should clarify exactly what standards, prescriptions and BMPs are to be applied in the riparian reserves, and how these specifically address the long-term goals of the riparian reserves. The US Forest Service will need to work closely with NOAA Fisheries and the US Fish and Wildlife Service to ensure that these treatments fully meet US Forest Service obligations to protect federally listed fish species habitat in riparian reserves.
- 4) As presented, the prescriptions for upland treatments are generic, based on broad ranges, and potentially quite aggressive. The EA should detail more specific prescriptions for proposed treatment areas and how these will recreate stands across the historic range of variability for different forest types with different fire regimes/successional states. For example, as written, the proposal calls for eliminating all grand fir and lodgepole from treated areas. While these species are certainly both over-represented in current stands, they are also natural components of the ecosystem associated with specific forest types and successional stages that are part of the historic range of variability. The EA should clearly show additional detail about how the more specific location-specific prescriptions to be developed in the EA will change the amounts and distribution of forest types, stand densities, successional stages, etc as compared to pre-project and project goals and objectives. The project should also include specific goals and standards for snag retention in different forest types.
- 5) Maps are often confusing (eg Fig 10, in which roads to be decommissioned and Hwy 97 appear in the same color), need work (e.g. inclusion of stream segments in Figure 8 as areas to treat that the text excludes from treatment) or are simply too small to be accurately read (maps are all 7"x7" or less). Consider making maps digitally available in a larger format (11x17?) with additional base map detail). Work needs to be done to ensure the final EA is specific, clear and accurate.
- 6) Significant information is not yet available (e.g. additional detail asked for above, the proposed TAP and plans for non-system road actions, or the many evaluation steps described in the future tense in the NOPA). Yet this comment opportunity was presented as the only formal opportunity to provide feedback on the project. The project would benefit from additional partner and public review as it goes on, but no mechanism for ongoing collaboration and review of the draft EA has been proposed at this time. Combined with the proposed use of an emergency action designation, this severely reduces the opportunity for broad engagement in, input on, and support for the project as more detailed plans are developed and evaluated. While we have faith in the skills and intent of the US Forest Service staff working on this project and the value of the project goals, the approach taken does not bring in either the additional benefits of a broader collaborative approach or the specific feedback that is typically solicited during a formal comment period on a draft EA. The US Forest Service should develop and share an outreach plan with specific opportunities to engage partners and the broader public in review of the project as the EA is developed.

