



NORTHEAST WASHINGTON FOREST COALITION

Gayne Sears
Newport/Sullivan District Ranger
315 North Warren
Newport, WA 99156

February 19, 2020

Comments to: comments-pacificnorthwest-colville-newport@usda.gov

Re: Sx^wutyn Project Scoping

Dear Ranger Sears,

Formed in 2002, the Northeast Washington Forest Coalition (NEWFC) works in concert with the Colville National Forest (CNF) to promote ecological forest restoration, aquatic restoration, recreation, economic stability in the community. NEWFC strives to collaborate with the CNF to increase efficiencies in planning, produce high-quality ecological forest restoration, compromise social differences, and support local communities. NEWFC primary mission is to demonstrate the full potential of restoration forestry and conservation actions to enhance forest health, wildlife habitat, public safety, and community economic vitality.

NEWFC is committed to working together to find common ground for the best forest management solutions. This solution-based approach has worked well and resulted in unprecedented success when compared to other National Forests. The amount of on the groundwork done by the CNF is a product of years of dedicated engagement by our members, community leaders, and CNF personnel. This journey is ongoing and always presenting opportunities for continued improvement and engagement.

Over the past ten years, NEWFC has developed and agreed upon a set of guidelines outlining acceptable impacts that enable us to give a level of support for a project based on the impacts that will occur when those guidelines are followed¹. NEWFC guidance is not a hard line, but something we can work from collaboratively to develop solutions that work for all parties. We have previously and continue to ask that the CNF provide us with details on where projects deviate from these guidelines. We are aware that our guidelines may be improved with updated scientific information, and we're working on updating them

¹ See attached guidelines



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and hope to have them by finalized before fall 2020. However, the guidelines still serve as the baseline for our agreement on projects and are necessary for our continued collaboration.

We provide input on the Sx^wutyn project with the hope that when the draft environmental assessment is released, we can provide our support for the project. We provide our list of comments, concerns, and questions in no particular order below.

Ecological Forest Restoration

NEWFC is interested in improving forest resiliency on the CNF. We thank you for the opportunity to meet with the silviculturists on the Sx^wutyn project. We anticipate seeing example prescriptions for stand conditions as discussed during that meeting so we can provide more detailed comments. We also ask for an explanation of how the landscape evaluation and landscape prescriptions have informed the example stand prescription. The need for restoration to promote resiliency in the Sxwutyn project is clear and evidence shows that some regeneration harvests are necessary to shift the species composition. However, we ask that this work be completed in multiple entries, as opposed to one intensive regeneration harvest.

Our review of the best available science shows that the following actions improve forest resiliency. We ask that you consider these as part of the project.

- Use a spatially explicit Landscape Evaluation as a diagnostic tool to assess how the current pattern compares to the historical pattern
- Conduct planning and management at appropriate scales to effectively restore multi-level landscape patterns, processes, and dynamics.
- Retain and release large trees, old trees, and old forests. When large and old trees aren't present, retain the second and largest mixed cohort that will become large and old trees.
- Move toward restoring natural fire regimes and the variation in successional patterns that support them so that other processes may follow.
- Shift the composition towards fire and drought-tolerant species as appropriate for the forest type.
- At the stand scale, restore characteristic tree clump and gap variation within patches.
- Reduce stand densities and increase mean diameter.
- Retain and create snags and down logs, especially large ones.
- Treat activity fuels and favor prescribed burning.
- Move toward restoring size distributions of historical successional patches.
- Use topography to guide restoration of successional and habitat patchworks
 - Create natural edges and borders where no longer present
- Use reference conditions as a guide for desired stand densities
- Reduce ladder fuels.
- Manage for complexity and heterogeneous landscapes.
- Promote pyrodiversity in the appropriate areas (i.e. mixed-severity forests).



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- Consider the future range of variability and future water deficit scenarios when planning project actions.

The rationale for a subset of these actions are provided below.

Individuals, Clumps, and Openings (ICO) approach (Larson & Churchill 2012)

The ICO prescription includes adding heterogeneity within stands to mimic the natural pattern (Larson & Churchill 2012). Intra-stand spatial heterogeneity is essential for ecological functions and processes. It accurately replicates historical distributions of trees for stand scale areas by creating local and broad heterogeneity (Hessburg et. al 2015).

The variable spacing of this type that would occur with ICO can have many advantages (as summarized by Franklin et. al 2013):

- Reduces crown fire frequency
- Reduces the chance of epidemic insect outbreaks
- Reduces spread of dwarf mistletoe and pathogenic fungi
- Both the clumps and openings create bird and wildlife habitat
- Facilitates a multi-aged structure through variable regeneration of age classes in clumps and openings
- Increases abundance and diversity of understory vegetation
- Increases snow retention, thus affecting soil water, understory vegetation, and fuel moisture, which is especially crucial due to the impact of climate change on snowpack

Large & Old Trees

Large trees are rare on the landscape and serve as ecological legacies for 100 years or more. Fire-resilient species, such as ponderosa pine and western larch, have evolved in fire-prone landscapes to withstand frequent fires of low to moderate intensity fires. Large trees are especially likely to survive fires due to their thick, fire-resistant bark. Because very few large old trees exist on the CNF and in Northeast Washington, the removal of even a few can have a significant impact on the landscape and in local areas.

Spatially Explicit Landscape Evaluations

We are delighted that a spatially explicit landscape evaluation (SELE) is being conducted for this project. This SELE will help ensure that the landscape moves towards resiliency. Without analyzing the area at the appropriate scale, there's no certainty that the proposed treatments will have the intended effect on forest resiliency. We ask that the results of the SELE are applied as a diagnostic tool for this project.

Watershed Health

NEWFC is interested in improving aquatic health on the CNF and therefore supports the inclusion of aquatic restoration in the purpose and need of this project. We're encouraged by the watershed-scale aquatic analysis that has been conducted for the Sx^{utyn} project. It's apparent that this analysis has resulted in high quality proposed actions.



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NEWFC encourages road decommissioning, obliteration, and culvert replacement to reduce hydrological damage, restore fisheries, and improve wildlife habitat. We also support a functional transportation network for access because roads are required to accomplish forest treatments, provide recreational opportunities, provide forest commodities, and are used in various ways for fire suppression and prescribed fire on the CNF. Our collaborative agreements on roads are included as an attachment.

We encourage adequate closures on decommissioned and temporary roads, such as line-of-sight obstructions. We ask the temporary roads are obliterated promptly after the project is complete and are subsequently monitored for unauthorized use and detrimental hydrological impacts. We maintain that these roads must be decommissioned in a manner that goes well beyond the standard procedure for closure of level-1 roads, which is often ineffective in preventing illegal use by OHVs.

Local Infrastructure & Economics

Pend Oreille County is blessed with the ability to achieve its restoration goals partly because of the diverse wood products industry in the area including Ponderay Newprint, Vaggen Bros Lumber, and the numerous forestry contractors. The contribution to the local economic health and stability of rural communities is a long-standing tenant of our collaborative agreements. We ask that the Forest Service recognize this importance by adding economic viability & support to the local infrastructure to the purpose and need. Due to the large extent of this project, we ask that you give multiple opportunities to bid on the project.

NEWFC is also interested in making sure that any restoration work proposed is packaged to potential bidders in a way that is economically viable to ensure successful implementation.

Recreation

The following recommendation has been developed by a diverse group of recreation stakeholders with a desire to develop sustainable recreation opportunities within the Sx^wuytn Project planning area. Using a collaborative model this recommendation was generated through consensus. This group consists of representatives from the following recreation types:

- Snowmobilers
- OHV Riders
- Motorcycle Riders
- Mountain Bikers
- Back Country Horsemen
- Hikers
- Hunters
- Fisherman
- Kayakers

Recommendation Overview

The intent of this planning process is to develop a list of prioritized projects that is acceptable to a diverse group of stakeholders. These projects would be feasible and sustainable with commitments from



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stakeholders to help fund, implement and maintain the associated projects. Due to these criteria, not always did the project with the most support get the highest ranking. The following is the final list of recreation related projects that the subcommittee would like to submit to the Project Leadership Team for consideration and potential inclusion in the proposed action for the Trail (Sx^wuytn) Tribal Forest Protection Act NEPA review.

Aesthetics and Viewshed

The project includes viewsheds from several trails on the CNF including the popular Bead Lake trail. We're interested in maintaining the viewshed of the official trails in the area. Maintaining the viewshed does not mean we are opposed to treatments within eyesight of the trails. Instead, it means example prescriptions for these areas are needed for the collaborative to assess, adequately state questions and concerns, and request revisions, if necessary.

Wildlife

We're interested in maintaining and improving wildlife habitat within the project area.

We request that all snags larger than 20" DBH be retained during the project (unless they pose a significant safety risk). Old snags are rare on the landscape and provide habitat for numerous species of wildland. Large old snags will eventually become large downed woody debris, which creates more habitat for wildlife and microclimates for plant species. Many animals evolved with higher levels of snags on the landscape, while timber management and fire suppression have decreased the abundance of snags.

The adequate number of snags per acre for wildlife species is variable and highly dependent upon the surrounding landscape pattern. However, DecAID, the Decayed Wood Advisor for Managing Snags, Partially Dead Trees, and Down Wood for Biodiversity in Forests of Washington and Oregon (<https://www.fs.fed.us/r6/nr/wildlife/decaid/>) can be used to determine an estimate. For example, DecAID recommends 6 -17 snags per acre >20" DBH in a post-fire structural type in the Eastside Mixed Conifer Forest N Cascades/Rocky Mountains as a 50% tolerance level.

We envision being able to discuss our questions and interests in further detail in the future. We are supportive of the project, and thank you for the opportunity to collaborate on the Sx^wutyn project. We ask for open communication, collaboration, and involvement on these issues and look forward to your response.

Sincerely,

Mike Petersen
Vice Chair
Northeast Washington Forest Coalition