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Comments: [Copied from attached letter]

Meg Trebon

Methow Valley & Tonasket Ranger Districts  
24 West Chewuch Rd

Winthrop, WA 98862

Electronically submitted through: <https://cara.ecosystem-management.org/Public/CommentInput?Project=58192>

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

August 13, 2020

Dear Ms. Trebon,

On behalf of Methow Valley Citizen Council (MVCC) and its members, thank you for the opportunity to comment on the, "Okanogan-Wenatchee National Forest's proposal to amend specific standards and guidelines in the Okanogan Land and Forest Resource Plan (Forest Plan) that address the management of Forest Plan Old Growth (FPOG) and vegetative cover used by deer." MVCC raises a strong community voice for the protection of the Methow Valley's natural environment and rural character advocating for and engaging our members in public processes to positively influence forest health projects. MVCC supports Forest Plan amendments that better align with landscape management strategies which are consistent with the Forest Restoration Strategy.

It is important to MVCC that the Forest Service address the following comments:

1. MVCC believes the trade-offs proposed by such amendments should be plainly identified and thoroughly discussed. The potential effects of the proposed changes should be well described in an Environmental Assessment.

While MVCC recognizes there are efforts to keep plans current and help districts adapt to new information and changing conditions, the environmental consequences, either positive or negative, of the proposed changes must be evaluated prior to future actions. Saying that, "amendments have been analyzed multiple times, (and) additional analyses[hellip] are not warranted," is inadequate. If this has been done on a project-specific basis, as described, these analyses do not account for the Forest Plans entire land base. If approved, the amendments would signal a significant shift in management direction with wide ranging effects. We understand that Categorical Exclusion can be a useful tool, but you must bring our community along through this process. In this case, Categorical Exclusion does not seem appropriate because modifying standards and guidelines that direct future activity must be accomplished by a proper planning process.

To better understand the purpose and need for these amendments it is important for the community to understand the challenges posed in the past when making amendments on a per project basis. How has the FPOG policy been an impediment in achieving the district's goals? How have these challenges restricted your

ability to maintain and restore FPOG? It is not clear what the need is for amending these Standard & Guidelines are, and we do not understand the effects these amendments will have because treatments are not described.

Further, managing according to a Historical Range of Variability is a significant shift in management direction. These changes must be considered in light of how proposed actions and their effects will vary from district to district. None of this is described in the Categorical Exclusion and requires an Environmental Assessment.

2. Changes made to the amendments regarding Forest Plan Old Growth are action oriented and warrant thoughtful clarification.

MVCC supports restoration activities aimed at increasing our forests' resilience to disturbances, but we are troubled by the proposed changes that would allow for timber sales in ecologically unique areas. FPOG areas have persisted not only because of their protective designation, but also because they are naturally fire-tolerant. As explained in the 2012 OWNF Restoration Strategy, "biological legacies can include fire refugia areas that either escaped fire due to landscape position (ex: rocky areas, ridgetops) or as unburned islands in a mixed fire event." An alternative method to manage FPOG would focus efforts on enhancing the resilience of younger early-successional stands that have the potential to exhibit old growth characteristics and serve as replacements for older stands impacted by disturbance.

These amendments address old growth mixed conifer stands, which naturally carry additional fuels and can exhibit stand replacing fire behavior so it is not clear why fuels reduction treatments in old growth mixed conifer forests would be an emphasis. Prescriptive guidelines must be considered if amendments are to apply forest wide. Since the amendments are aimed at treating natural fuels, perhaps additional language could help define the objectives:

Treatments in these stands will protect and enhance late-successional and old-growth forest structure, function, and composition, and focus on surface or ladder fuels less than 8" dbh.

There are many questions that have simply not been addressed: How will various elements of FPOG conditions be enhanced or maintained? What mitigation efforts will be used to limit degradation of the FPOG designation? How will machine piling and underburning impact forest structure and composition? How does this amendment continue to make sure that old trees are protected? How will snags and downed logs, essential to old growth stands be protected, recruited and retained over time? Traditional access for permitted firewood removal is not compatible with older forest conditions.

Design, mitigation and operational criteria are not addressed in the proposed amendments raising questions in regard to the intent and effectiveness of the proposed treatments.

Science has progressed significantly since the Forest Plan was first written but those advancements are not reflected in the proposed amendments. For the purpose of identifying old-growth, the definition for "mixed-conifer old growth" does not sufficiently differentiate between mixed-conifer and dry-forest pine dominated stands. Similarly, the definition used to identify "Old Growth Stands" covers a wide range of on-the-ground conditions. Meanings could be misinterpreted and stands mischaracterized. And, an inventory of FPOG, including their location and conditions, would be helpful to better understand how these align with Northwest Forest Plan Reserves.

3. The use of Historical Range of Variability (HRV) to inform treatments in areas managed for deer cover is not clearly defined.

MVCC feels that HRV metrics should not function as a hard limit, but rather as a tool to guide thinking about the

landscape. We look forward to an analysis comparing current conditions to both historical and future conditions across both districts and the degree to which these Management Areas have departed from reference conditions. How far from reference conditions would these Management Areas be if the current Standards and Guidelines criteria were to be applied? How much do HRV deer cover levels differ from those prescribed in the current Standards and Guidelines criteria? What Ecological Subregions will be used to determine the HRV? How will the HRV be integrated into project design? Additionally, it is critical that proposals for managing at the landscape level be evaluated and defined in more detail.

There is no information provided evaluating current deer and elk populations or addressing changes to habitat, available forage or cover. Changes in such vegetative patterns have cumulative effects, which require formal analysis. Additional concern lies in the differences between mule deer movement, snow levels and species composition on the Tonasket and Methow Valley Ranger Districts. It is imperative that there be a baseline against which to compare future efforts and outcomes if we are to ensure successful present and future project implementation.

Since the existing metrics being used are 33 years old, outdated and a challenge to meet, we suggest providing an evaluation that includes a description of the need to abandon current Standards and Guidelines criteria. What are the treatment types you will be allowing? How will allowing for treatments informed by HRV for vegetation aid in achieving District goals and WDFW deer management objectives? How will moving vegetation toward historic patterns effect the composition and arrangement of vegetation across both districts? How have past wildfires modified structure, cover and forage availability in Management Areas affected by these proposed amendments? It would be useful to provide the public with an opportunity to review supporting documentation such as resource specific monitoring reports, MA maps, or accepted science that support the proposal for, "allowing treatments in deer cover types according to HRV."

## Conclusion

We ask that you do not authorize these amendments before additional analysis and coordination that reflects a collaborative effort to develop and evaluate ecological prescriptions that meet the multiple objectives for old growth stands and deer cover levels has been done. Until then, the best method for managing FPOG and deer cover may be to continue amending Standards and Guidelines on a per project basis as has been done in the past. Past project-specific modifications have been supported by an Environmental Assessment, which these proposed amendments are not.

Lastly, we urge the Forest to continue to inform our community throughout the planning process and to extend the opportunity for the public to provide input especially during these times when Covid-19 precautions make it more difficult for members of the public to access information in person. Can you offer an online public meeting or engagement opportunity for our community to learn more and ask questions?

Once again, we thank you for the opportunity to comment on these important Forest Plan amendments. Please contact me if you have any questions - [jasmine@mvcitizens.org](mailto:jasmine@mvcitizens.org) or 509-997-0888 x3.

Sincerely,

Jasmine Minbashian Executive Director

Methow Valley Citizen Council