

March 24, 2022

District Ranger, Naches Ranger District
Okanogan-Wenatchee National Forest
10237 Hwy 12
Naches, WA
98937

TO: District Ranger

The following are comments on the Little Naches Upland Restoration (#58517), draft Environmental Assessment (EA), dated February 2022.

Invasive Weed Control – page 20. This section mentions the following herbicides to be used: Glyphosate, Aminopyrolid, Milestone, and Picloram. These are toxic herbicides that are meant to be used last (not routinely) as part of an integrated management approach.

- What is the estimated volume of each of the above herbicides that the Naches Ranger District expects to use over the next one year, five year, and ten year periods?

Cumulative impacts and interrelated projects - page 38. Although the Okanogan-Wenatchee National Forest (O-WNF) has failed to update its National Forest Plan for years, the O-WNF has engaged in numerous “restoration” activities. As required by NEPA regulations, interrelated projects are considered when determining potential cumulative impacts from past, present, and reasonably foreseeable future actions related to the proposed action. Cumulative effects analysis is needed to better understand associated effects (40 CFR 1508.7). Table 10 (p. 38) lists: “Present, future, and on-going activities in and adjacent to the project area.” It does not, however, list past actions.

- Please provide a similar table listing past projects and activities in the Naches Ranger District since 1980.
- What input has the Bureau of Reclamation and Department of Ecology’s Yakima Workgroup had in developing this restoration plan?

On February 15, 1990, the Naches Ranger District described how:

“Excess trees, diseased and damaged trees are removed in order in order to concentrate growth on the faster growing, healthier trees. This compares to the common practice of thinning carrots in a vegetable garden.”

(See attached letter.)

- Does the Naches Ranger District still view the O-WNF as a vegetable garden full of carrots?

Sediment – page 50. The EA states:

Thinning, biomass removal, and mastication activities conducted by mechanical equipment could indirectly affect TESP through soil compaction, alteration of hydrology, increased erosion, sedimentation, and damage to understory vegetation. These effects will occur in the short-term because of normal project activities.”

And page 58 states:

“Log hauling on system roads, temporary road construction/use, opening of closed roads, and timber yarding may indirectly cause effects to water quality from bare soil area creation, increasing erosion and sediment delivery to streams.

However, there is no sediment quantification estimates to give the reviewer any context as the magnitude of sediment impacts from the proposed project. In addition, sedimentation is so detrimental to irrigation, that in the past, irrigation district were the leaders in the early 1900’s in advocating for prohibitions on logging and grazing in our National Forests. (See attached).

- Estimates of sediment production from the proposed project should be provided.

In summary, it appears that the O-WNF and Naches Ranger District continues to engage in piecemeal forest planning without an updated forest plan and without a full understanding of the cumulative impacts within the Naches Ranger District. Therefore, the O-WNF should prepare an environmental impact statement to thoroughly review the cumulative environmental impacts stemming from this proposed project and past projects and logging activities on the Naches Ranger District. Please send me a copy of any final EA that is issued. Thank you.



David E. Ortman
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Seattle, WA 98117

Attachments



United States
Department of
Agriculture

Forest
Service

Wenatchee
National
Forest

Naches Ranger District
10061 Hwy 12
Naches, WA 98937
509-653-2205

Reply To: 2410/2470

Date: February 15, 1990

Friends of The Earth (Northwest Office)
4512 Way NE.
Seattle, WA 98105

Dear Sirs:

||| The Naches Ranger District is soliciting public input concerning the Timber Stand Improvement program for Fiscal Year 1991. This program consists of activities/treatments in unmanaged timber stands and previously harvested areas where the average tree is less than 7 inches in diameter. Excess trees, diseased and damaged trees are removed in order to concentrate growth on the faster growing, healthier trees. This compares to the common practice of thinning carrots in a vegetable garden.

In order to fully consider all resource values, we are requesting your review and comment.

Attached is a list of areas and vicinity maps proposed for treatment during Fiscal Year 1991. If you would like more detailed maps, directions to the proposed areas or further information, contact James Rhyno at the Naches Ranger Station, or call 653-2205.

Please submit your comments or concerns to this office by July 31, 1990. Thank you for your consideration in this matter.

Sincerely,

DONALD F. ROTELL
District Ranger

cc: J. Rhyno (Resource File)



Caring for the Land and Serving People

FS-6200-28(7-82)

Forestry and Irrigation reminds us that irrigators were once champions of keeping forests intact

By David E. Ortman, N3C member and attorney

As irrigation districts continue to threaten new water storage projects in our National Forests and Wilderness areas, why have irrigators forgotten the history of our National Forests? In his 1959 book *Conservation and the Gospel of Efficiency*, Samuel P. Hays notes that "Western irrigators... pioneered in the theory that watershed vegetation directly affected their water supply. Forests, they argued, absorbed rainfall, retarded stream run-off, and increase the level of ground water: forests retarded snow melting in the early months of the year, reduced spring floods, and saved water for summer use when supplies run low; forests retarded soil erosion and silting in irrigation ditches and reservoirs."

Those same irrigators "played a major role in establishing the national forests and in defending them from attack. . . . Throughout the [1890s] irrigation groups petitioned, often successfully, that the president reserve particular watersheds as national forests to protect them from commercial use. . . . Irrigators constantly sought to improve protection of the forests from fire and timber depredations, to withdraw them from all commercial use, and to prevent timber cutting and grazing within them."

There is a wealth of information in the American Forestry Association's publications of *Forestry and Irrigation* from the early 1900s. I acquired several issues and found an amazing history of how irrigators fought to establish National Forest Reserves all over the public lands.

In a November 1906 article, "The Mining Industry and the Forests," Lewis E. Aubury, State Mineralogist of California says "That there is urgent need for more national and state legislation in regard to the protection of our forested areas, both from fire and the operations of timber speculators, is a subject which I believe is worthy the attention of the American Mining Congress... one of the greatest causes for concern is the fact that most of the available timber land is in the hands of a few individuals or corporations. For instance, in California approximately one million acres is controlled by one individual."

The September 1907 issue mentions that the Fifteenth National Irrigation Congress held in Sacramento, California, included

an address by U.S. Senator Perkins of California, "Without our forests there would be no irrigation."

In February 1908 came a call to protect natural resources. An editorial called "Equip the Association," asks, "What greater cause could appeal to philanthropy

"The only trouble with the movement for the preservation of our forests is that it has not gone nearly far enough, and was not begun soon enough."

—President Theodore Roosevelt
in *Forestry and Irrigation*,
February 1908

than that of preserving our heritage? What weightier obligation can be laid upon the conscience of one who has accumulated millions from our boundless resources than to aid in perpetuating these resources? Men give to the transitory; why not to the permanent? They contribute to small causes, why not to great? They build libraries; why not maintain the supply of material from which books and buildings must be made? They multiply colleges: why not recognize that, whether schooled or unschooled, people must draw their supplies from the earth?"

Another editorial in the same issue, "The Pressing Need", says "We have the Director of the Reclamation Service pointing to the vast and beneficent work now in progress under Government auspices in the way of redeeming the desert and providing homes for the people; but averring at the same time, that the continuance and success of this work are absolutely dependent upon the retention of forests upon the mountain sides, which in turn, is dependent upon National action."

Issues from 1907 and 1908 show the AFA mobilizing to protect forests. A March 1907 editorial supported the passage of the Appalachian-White Mountain bill permitting

the federal government to purchase private lands in order to protect the headwaters of rivers and watersheds in the East—a big step in a time when then Speaker of the House Joe Cannon had declared there would be "not one cent for scenery!" Its step-by-step plan for lobbying Congress admonishes readers, "Don't wait for something to begin: make it begin. Don't wait for a crowd to get interested; get the crowd interested by interesting the few. All great things have small beginnings. One person can start this movement in any neighborhood, and unless one person starts it, it will not start. Now let all set to work to make sentiment for the Appalachian bill, and by next December a pressure can be brought to bear upon Congress which will be irresistible." A few issues later, the Forestry Association asked people to send in "a list of names and addresses of a dozen or two of friends who could be interested in this movement."

From October 1907: "In view of the fact that certain timber cutters, notably the pulp men, cut clean, leaving nothing behind them but stumps, and believe this to be the only profitable course for them to pursue, the question naturally arises as to how pulp wood will be cut when the forester's ideal is realized and timber slaughter is ended by law."

From the same issue: "Gradually we are getting our eyes open. The earth is the common foundation upon which all must stand, the common storehouse from which all must draw their supplies. Our natural resources constitute the raw material from which, by the application of labor and capital, all must live, if they are to live at all. The waste of natural resources is a public tragedy if not a public crime. The preservation of these resources is a matter of the greatest public moment."

It would be helpful if irrigators and we would remember this history.

Want to read more? Find AFA publications from this time period at:

<http://www.onread.com/writer/American-Forestry-Association-102311/>

or download issues of *Forestry and Irrigation* free from https://books.google.com/books/about/Forestry_and_Irrigation.html?id=HUCKAQAAAMAAJ