



North Central Washington Audubon Society
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April 14, 2026

Erica Taecker
District Ranger, 600 Sherbourne St.
Leavenworth, WA 98826

Re: Eagle Creek Project Draft Environmental Assessment

Dear Ms. Taecker,

North Central Washington Audubon Society (NCWAS) is a local chapter of the National Audubon Society with approximately 500 members in Chelan, Douglas, Okanogan, and Ferry Counties in North Central Washington State. We're submitting the following comments regarding the Eagle Creek Project Draft Environmental Assessment (DEA).

NCWAS fully understands the concerns about wildfire risks in the area and supports habitat restoration efforts aimed at approximating the healthier and more fire-resilient conditions that prevailed in pre-settlement times. We applaud the use of the Okanogan-Wenatchee National Forest Restoration Strategy (2012) and LSR Assessment (2024) to drive proposed treatments in this project. This said, while the Eagle Creek Project DEA covers a wide range of issues that should be addressed, it's also clear that the project's implementation will be hard on the landscape and the wildlife that currently lives in the area. The suggestions we offer below are aimed at minimizing the negative impacts to birds and other wildlife currently living there, while also producing the desired mixture of high-quality fire-resistant habitats that are most beneficial to wildlife in the long run.

Forest Thinning

Reducing the risk of future wildfires in the area is clearly the project's overriding purpose. However, minimizing its near-term impacts on wildlife and maximizing long-term benefits to them is of equal concern to us. For this reason, we suggest its actions be designed to minimize disruptions to species currently living in the area, while also fostering a wildfire resilient ecologically healthy forested landscape that's capable of supporting the full range of native biodiversity that historically occurred there.

Important to reaching the desired end state in the shortest period of time, we believe, to be the tree diameters that are left on any given area. Ideally, the treated landscape, in all cases, will be occupied by preferred tree species of the largest diameter currently occurring on all portions of the project's footprint. In other words, whatever the current diameter composition in any given area, we suggest always leaving the largest trees.

We have noted the tree diameters mentioned in the DEA, but it's not clear to us that they will, in all circumstances, result in retaining the largest specimens. For example, in areas where the largest diameters are in the range of 6-12 inches, will the largest individuals of the desired species always be left standing? In areas that don't contain 24" dbh trees, will the largest trees, whatever their diameter, be retained?

As we understand it, the current plan is to allow contractors, rather than Forest Service technicians, to select the trees to be retained. This strategy seems very unwise to us, as it leaves quality control to the discretion of individuals that are possibly mostly concerned with getting the job done. To assure the best results, we suggest Forest Service personnel make the selections. If this, for some reason, will not be the case, a secondary option would be for the selection process to be contracted out to a company specifically directed to make selections that will yield the desired tree retention results.

Other Considerations Related to Operations

- 1) While the DEA indicates Douglas fir trees infected with dwarf mistletoe will be targeted for removal, these trees are also important food and nesting structures for a variety of wildlife, including the northern spotted owl. Do not eliminate this natural native species from the landscape and retain it at natural-historic levels. Target removal of those that are close to the ground that are fire ladder fuel hazards.
- 2) Minimize the use of heavy equipment for construction of fireline. If used, keep equipment out of riparian reserves and off steep slopes, and use the smallest/lightest machine that will meet the objectives. Keep width and depth of fire line constructed to a minimum.
- 3) While the DEA indicates that shrubs and other small plants will be retained in some areas, in the interest of the end result supporting the widest range of native biodiversity, we suggest that the retention of shrubby habitats be maximized to the extent possible. We understand that some of it will be removed. However, consistent with the goal of increasing fire resilience, NCWAS requests that a balance be found that maximizes the retention of as much understory habitat as possible.
- 4) We suggest that the project maximize the retention of medium and large sized snags. When the project is complete, the landscape should ideally contain a substantial component of snags that are well distributed across the landscape.
- 5) Because April-July is prime breeding season for numerous wildlife species, we suggest that project operations avoid this period as much as possible. Wildlife species are adapted to the natural-historic timing of wildfires, which primarily occurred in the late summer and fall in this area, so please minimize broadcast burning in the spring to the extent possible.
- 6) Referencing the DEA Table 30, Wildlife 1, please conduct surveys at known/historic raptor nest sites prior to contract award so stands and post-fledging areas can be delineated and managed appropriately.

- 7) Any project work in late successional reserves should be conducted in fall to minimize impacts to old growth dependent species, such as northern spotted owl, american martin, northern flying squirrel, etc. We believe doing so will have the benefit of avoiding the breeding season of most species and allow time for the dispersal of young and displaced individuals to find and become established in other areas capable of supporting them through the winter.
- 8) Within the landscape targeted for thinning, some areas should be left as they are. Leaving such patches within the otherwise thinned landscape would add overall ecological complexity while likely not meaningfully compromising fire resilience.

Roads

The DEA addresses various components of road activities including maintenance, drainage improvements, reconstruction of old existing roads, construction of temporary ones, etc. Our concern regarding the project's road network is that it is kept to the absolute minimum needed to facilitate project implementation and avoid impacts to riparian areas. As much as possible, the road system occurring on the area after the project is completed should be reduced to a bare minimum via decommissioning, closures to all motorized vehicles, and hydrologic restoration of opened and temporary roadbeds including planting native species. Please provide a map displaying road actions described in Table 7 of the DEA so these can be reviewed spatially. We appreciate the effort of locating historical roads and skid trails and using these previously disturbed footprints for new temporary roads.

Conclusion

We appreciate the opportunity to submit comments to this project. We believe our suggestions, if accepted, will minimize the project's near-term impacts upon wildlife currently living in the area and lead, most quickly, to achieving to a better result than would otherwise be the case.

Sincerely,

A handwritten signature in cursive script that reads "Arthur Campbell".

Arthur Campbell
President, North Central Washington Audubon Society