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Title:

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Okanogan-Wenatchee National Forest

Chelan Ranger District

c/o District Ranger Holly Krake

428 W. Woodin Avenue, Chelan, WA 98816

RE: Conservation Northwest Comments for the Lower North Shore Landscape Restoration Project Draft Environmental Assessment

Dear Ranger Krake,

I am writing on behalf of Conservation Northwest and its members to voice our support, concerns, and recommendations regarding the Lower North Shore Landscape Restoration Project Draft Environmental Assessment (EA).

Conservation Northwest protects, connects, and restores wildlife habitat across Washington and British Columbia. We have been actively involved in forest management on the Okanogan-Wenatchee National Forest (OWNF) for over 30 years. Our organization has a long history of enhancing habitat and populations of culturally significant and at-risk species. We appreciate the opportunity to comment on this project, and we offer the following comments to improve wildlife habitat, and ensure good ecological outcomes are reflected in the Final EA and on the ground.

We support the overall proposed project's intent to reduce wildfire severity and risk, sustain dry forest wildlife habitat, and increase the health and resilience of vegetation in this landscape. We appreciate the use of the Okanogan Wenatchee Forest Restoration Strategy, the Lower North Shore Landscape Evaluation, and the Chelan Planning Area Landscape Evaluation Summary to identify high-priority areas where restoration treatments will make the greatest positive impact on multiple forest resources. We recognize the Okanogan-Wenatchee Forest Restoration Strategy as the best guidance for implementing the best available science to promote resilient forest conditions for wildlife, wildfire resilience, and climate change and are pleased to see its incorporation throughout this project.

Prescribed Burning

Conservation Northwest is very pleased to see that the total amount of acres proposed for prescribed burning in the Lower North Shore Restoration Project matches the amount of non-commercial thinning acres proposed. We also appreciate the proposed use of pile burning followed by underburning in non-commercial treatments. Underburning can address the remaining surface fuels while also restoring the ecological role of fire following mechanical treatments. We encourage the Forest to implement underburning on all acres receiving pile burning as conditions allow. It is unclear whether that is the case in the Draft EA.

We also commend the inclusion of 9,071.7 acres of prescribed burning in areas that are too steep to thin and the use of treatments such as tree well burning to aid in meeting objectives to retain large trees on the landscape. The inclusion of maintenance prescribed fire treatments is encouraging. We highly encourage the Forest to identify a strategy for implementation and funding that will ensure these maintenance treatments occur as needed rather than relying solely on annual reviews by the interdisciplinary team.

Fireline Creation and Maintenance

We are encouraged to see that natural features will be used to reduce the need for line construction wherever possible. The Draft EA states that firelines, both hand and machine lines, will be repaired to Forest standards. We would like to see more detailed information pertaining to this. How soon will firelines be repaired and how will they be repaired? We recommend reseeding disturbed ground from firelines with native, fire resilient plant species like native bunchgrasses to prevent invasive, fire prone species like cheatgrass from taking over. The Forest should also subsequently monitor firelines for invasive species and apply follow-up treatments as needed. We also urge that fireline repair is initiated as soon as feasibly possible, as these may unintentionally facilitate access to motorized recreation like ATVs or snowmobiles.

Lastly, with the stated vegetation prep within 50 feet on either side of control lines, and the stated emphasis there on snag felling, we urge the Forest to retain large legacy snags as these serve as important ecological features for wildlife and present low fire risk. Large snags provide important nesting, foraging, and roosting features for white-headed woodpeckers, pileated woodpeckers, northern flickers, secondary cavity nesters, bats, and birds of prey.

Canada Lynx

We encourage the maintenance of connectivity and travel corridors for Canada lynx within areas proposed for fuel management. Lynx rely on connected habitat across landscapes including a mosaic of forest conditions and matrix habitats that allows them to move between patches of suitable habitat. Given the extent of the proposed vegetation management within the Cooper Mountain LAU, we encourage the Forest to strategically retain connected areas of denser forest habitat within the treatment landscape rather than evaluating habitat primarily on total acreage remaining after treatment. Where possible, these areas could overlap with riparian areas, moist forest conditions, or other sensitive areas that should receive lighter maintenance. Maintaining connected patches of denser forest in these locations could provide movement habitat for lynx while also retaining important habitat features for other wildlife species associated with dense forest conditions like fisher, spruce grouse, and porcupine. Conservation Northwest therefore requests that implementation planning identify and retain strategically connected areas of suitable habitat within and between treatment units to maintain habitat connectivity for lynx and other wildlife species.

Whitebark Pine

We are pleased to see that the project already commits to not thinning whitebark pine or other five needle pines as stated in the proposed treatment description. Given whitebark pine's ecological importance and vulnerability, we think this protection would be stronger in practice if whitebark pine within treatment units were marked ahead of time so crews can avoid confusing it with lodgepole pine during thinning or fireline construction. We are also interested in how the overall project is expected to affect whitebark pine. Could you please provide a map of modeled whitebark pine habitat along with treatment units and fireline locations, as well as the total acres of whitebark pine habitat within the project boundary? We also request that the Final EA clearly describe the potential effects of the proposed treatments and firelines on whitebark pine habitat.

Mule Deer Habitat and Roads

In the early stages of the project design, the Forest Service identified overlap between the project area and three mule deer winter habitat areas. These were the North Shore Lake Chelan mule deer winter range, the Mitchell 4th of July Mountain deer winter concentration area, and the Union Valley deer winter range and potential seasonal closures were proposed for roads 8200119, 8200117, and 8200116. We recognize that the scope of the project might have changed since, but we encourage the Forest to reconsider seasonal closures and alternative routes that avoid core mule deer habitat. Because vegetation treatments may increase visibility across the landscape and reduce the availability of dense winter cover in treated areas, the remaining areas of winter refuge may become even more ecologically important for mule deer.

Aquatics

While no changes to the road network are proposed in this project, we see an opportunity to improve aquatic conditions that are affected by roads while the District has resources focused on the Lower North Shore project area. We highly encourage the Chelan Ranger District to explore options for remediating aquatic organism passage at road stream crossings within the project boundary.

Conclusion

Thank you for the opportunity to share our recommendations for the Lower North Shore Landscape Restoration Project. We look forward to continued engagement as the project moves towards implementation.

Sincerely,

Marcela Todd Zaragoza
Wenatchee Forest Lead
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