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December 3, 2018

Mike Williams, Forest Supervisor
c/o Justin Gelb, Project Lead
Naches Ranger District
10237 Highway 12
Naches, Washington, 98937

Dear Justin:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Little Crow Restoration Project combined scoping and comment period with proposed Northwest Forest Plan amendment.

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities adjacent to the Okanogan-Wenatchee National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The Forest Products sector in Washington provides around 40,000 direct and 100,000 indirect jobs. Many of these are found in rural communities, such as those adjacent to the Okanogan-Wenatchee. Wages paid, income taxes, and other monetary transactions generated by these businesses and family-wage jobs substantially contribute to the infrastructure and well-being of the local communities.

Lack of supply of raw materials to fill manufacturing demands for wood products continues to be an issue in Washington. In the past few years, there have been several mill closures in Western Washington partly due to lack of access to logs. Vegetation management projects on the Okanogan-Wenatchee, including the Little Crow Project, can help contribute to a predictable wood supply that many mills, both in Washington and Oregon, depend on to continue operations and sustain their work force. The opportunity to competitively bid on future volume offerings from this EA will help to assure the milling infrastructure continues to provide an outlet for commercial products developed through these types of projects. AFRC has previously submitted comments during the scoping and Draft EA phase of the Little Crow project. The comments in this letter are similar, and address three additional issues: 1) a project specific Northwest Forest Plan (NWFP) amendment, 2) a 55-acre additional treatment proposed for the promotion of

white-headed woodpecker habitat that was not included in stand delineation and 3) the application of lignosulfonate (a naturally occurring polymer found in wood) for dust abatement on log haul routes.

The Little Crow Restoration project area includes approximately 56,871 acres of National Forest System lands located in the southern portion of the Little Naches watershed and includes the Crow Creek and Lower Little Naches River subwatersheds. AFRC supports both the Purpose and Need for this project. The overall purpose of the Little Crow Restoration project is to increase forest resiliency, restore aquatic resources, and maintain public access within the larger context of the Little Naches watershed. The needs for the project include:

- Accelerate the development of a sustainable vegetative structure, composition, and pattern, which will allow for natural processes to function.
- Improve hydrologic function and water quality by reducing storm water drainage connectivity from roads and trails to the stream channel network.
- Restore stream habitat conditions to contribute towards long term recovery goals of listed fish species.
- Provide for an economically and environmentally sustainable transportation system that maintains public access for recreational opportunities, special uses, and other traditional and non-traditional Forest use in the context of vegetative and watershed health.

Based on the information contained in this environmental analysis, the Naches District Ranger will take the following actions:

- Increase forest resiliency throughout the project area.
- Restore aquatic resources within the project area.
- Maintain public access to the project area
- Enhance resources such as late successional habitat, riparian habitat, visual quality, recreation use, and various resource needs, objectives, and desired future conditions within the project area.

While AFRC supports the project, we would like to offer the following recommendations to help frame the final implementation of the project.

1. First, AFRC supports the new Alternative 3 including a project specific Northwest Forest Plan (NWFP) amendment. This amendment would allow the Forest to treat LSR stands that are over 80 years of age. Thinning as provided by the amendment would reduce ladder fuels, understory and overstory stand density in the forested area, lessening the likelihood of uncharacteristic widespread crown fire initiation. The amendment would be limited to about 6,317 acres and would be temporarily limited to the duration of the project's implementation. Where overstory thinning occurred as a result of this amendment, the risk of crown-to-crown fire would be reduced because thinning would decrease crown density. The substantive provisions related to the purpose of the amendment to provide for forest harvest activities in stands over 80 years old in LSR and MLSAs are found at: 219.9(a)(2)(i) Key characteristics associated with terrestrial ecosystem types.

Further under 36 CFR 219.13(a) Plan amendment, a plan may be amended at any time. Plan amendments may be broad or narrow, depending on the need for change, and should be used to keep plans current and help units adapt to new information or changing conditions. The responsible official has the discretion to determine whether and how to amend the plan. Except as provided by paragraph (c) of this section, a plan amendment is required to add, modify, or remove one or more plan components, or to change how or where one or more plan components apply to all or part of the plan area (including management areas or geographic areas).

2. AFRC supports the Forest Service’s position that in Alternative 3 no additional analysis is required for vegetation in regard to the 55 additional acres of vegetation treatment proposed for the promotion of white-headed woodpecker habitat. These 55 acres were included within the area analyzed in Alternative 2.
3. AFRC supports the Forest Service’s analysis that the use of Lignolsulfate on log haul routes will have no effect on fuels systems within the Little Crow project area. Lignolsulfate is a by-product of the pulp and paper making process and has been used for dust abatement on forest roads for decades with no adverse effects.
4. In addition to these first three points which are the basis for Alternative 3, AFRC suggests that the economics section of the project analysis could be strengthened by highlighting the importance of maintaining the local logging and milling infrastructure which will actually be doing the treatments on the ground. The volume of timber removed from this project will create many jobs in rural communities within the bounds of the Okanogan-Wenatchee National Forest and outside of the Forest’s boundaries. For every million board feet of timber harvested approximately 12 jobs are created. Several milling facilities have left communities surrounding the Okanogan Wenatchee in recent years due to lack of adequate log supply. It should be noted that projects like the Little Crow will help maintain those milling facilities still in place that depend on wood from the Forest and will also help support the existing logging infrastructure.
5. AFRC applauds the District for revisiting the issue of road decommissioning, road closure and road relocation as it applies to stream and aquatic issues. AFRC asks that one final assessment be given before the making a final decision to decommission 24.4 miles of system road, close (storm proof) 39 miles of system road and decommissions 10 miles of unauthorized road. The Forest has invested millions of dollars in its road system and AFRC would prefer to see roads closed by gating or by berms rather than by decommissioning or obliteration if future access is needed for fire, or harvest. The road plan is in table 2-3 below:

Table 2-3: Summary of Road Management Actions

| Category | Total Miles of Road |
|--|---------------------|
| System roads to be decommissioned | 24.44 |
| System roads reconstructed (structural upgrades) or maintained | 140.64 |
| Unauthorized roads to be decommissioned | 10.15 |
| System roads to move from ML2 to ML1 | 3.40 |
| System roads to move from ML1 to ML2 | 12.58 |
| Unauthorized roads converted to system roads | 0.13 |
| System road converted to system 4WD trail | 0.22 |
| Unauthorized road converted to system snowmobile trail | 1.36 |
| Temporary roads constructed | 20 |

One of AFRC's main concerns will be the cost of decommissioning 34.59 miles of system and non-system roads and how those economics will play out with the needs of other resources.

As per the definition of Road Decommissioning found on page 2-23: The objective of road decommissioning is to return the unneeded road to a more natural state.

Decommissioning is accomplished using techniques intended to transform the road area from a facility to productive Forest land. Approximately 24.44 miles of Forest Service System Maintenance Level 1 and 2 roads (14% of the 179 miles of system road within the project area) are proposed for decommissioning (Figure D-14, Appendix D). An additional 10.15 miles of unauthorized roads (roads existing on the landscape, but not authorized in the forest transportation system) are proposed for decommissioning. Actions to achieve this typically include:

- De-compacting the road prism.
- Re-contouring all or part of the road prism to re-establish drainage patterns that move storm water across the road scar rather than along its' length. Road prism re-contouring would also be designed to prevent runoff from immediately entering adjacent streams.
- Removing culverts.
- Removing stream crossing road fill and re-contouring and revegetating the streambanks.
- Constructing waterbars.
- Constructing earthen barricades.
- Armoring overflow and outflow channels to reduce resource damage.
- Controlling erosion.
- Seeding and mulching to promote vegetative revegetation.

AFRC agrees that these unneeded and ill placed roads need to be kept from use by motorized vehicles and the current erosion and sedimentation being caused by these roads need to be curbed. AFRC believes that in many cases only earthen barriers, gates, or waterbars will be needed to provide desired results without the expensive re-contouring measures.

6. As pointed out, many of the stands in this Project area are at risk to uncharacteristically large wildfires and attack from insects and disease. AFRC suggests that the Forest should commercially treat as many acres as possible within the 56,936 acre project area to fireproof these stands and make them more resilient to insect and disease outbreaks. AFRC also believes that more work could be done to enhance the habitat for northern spotted owl, white-headed woodpecker, three-toed woodpecker and black-backed woodpecker. For example, Table 2-2 lists the maximum potential commercial treatable acres to enhance large and old tree development is 10,081 acres, however the proposed action is planning on treating on 6,500 acres. For the northern spotted owl, there is the potential to treat and enhance 6,317 acres, but only 2,990 acres are being planned for treatment. The same opportunities for additional treatment acres apply to other species enhancement.

Over the past several years many Forest Service projects have been scaled back in scope to a reduced level of acres treated due to perceived effects to the northern spotted owl, including thinning treatments designed to improve owl habitat. We encourage the Okanogan-Wenatchee to consider a recently published study conducted by NCASI when assessing treatment areas and their potential affects to owls.

Larry L. Irwin, Dennis F. Rock, Suzanne C. Rock, Craig Loehle, Paul Van Deusen.
2015. Forest ecosystem restoration: Initial response of spotted owls to partial harvesting

Among other findings, this study concluded that partial-harvest forestry, primarily commercial thinning, has the potential to improve foraging habitats for spotted owls. The treatments being proposed will likely affect northern spotted owl habitat to some degree. Often this level of effect is quantified by the amount of forest canopy that remains following thinning treatments. AFRC has general concerns with how the Forest has been measuring these effects to NSO habitat, specifically regarding canopy cover/closure. Please see the attached document titled 'NSO Canopy Condition' as an addendum to these comments for consideration in how the treatments on this project are designed and how this design affects the NSO.

7. AFRC further suggests that in those areas being treated for fire resiliency and enhancement of large and old tree development that thinnings be conducted that will significantly reduce the basal area in the stands and crown closure. Since this project area will probably not be entered for at least another two decades, the stands should be thinned to a spacing that will provide for maximum growth and forest health for that time period.
8. AFRC supports the thinning of overstory with prescribed fire following on 1,651 acres which will increase the amount of sunlight reaching huckleberry plants and reinvigorate existing stems resulting in larger fruit production. Reduced canopy cover will also create conditions where huckleberries can expand their existing footprint. Again, AFRC recommends thinning to the widest possible opening sizes to promote huckleberry growth and production.
9. Another main purpose and need of this project is to improve hydrologic function and water quality, restore stream habitat conditions and aquatic organism passage, and provide for an economically and environmentally sustainable transportation system. The Northwest Forest Plan allows for work in Riparian Reserves to control stocking and acquire vegetation characteristics needed to obtain Aquatic Conservation Strategy objectives. Such work would be appropriate for this project. It has been documented by many that most of the wood that naturally recruits to streams comes from within the first 65 feet of the stream channel (Murphy and Koski, 1989; McDade et al. 1990. Johnson et al. 2011). If this is where the LWD is coming from then thinning in this region would likely accelerate its creation. We encourage the Forest to design riparian thinning treatments on this project in ways that foster positive changes to large wood supplies that would result in measurable changes. One way to accomplish this is to reduce the no-cut

buffers. It has also been documented that vegetated buffers that are greater than 33 feet in width have been shown to be effective at trapping and storing sediment (Rashin et al. 2006). Partial cutting down to one or two conifers from intermittent and perennial stream channels would accelerate the recruitment of LWD with minimal impacts to sedimentation and stream temperature. We would like the Forest to consider these trade-offs closely in the planning for this project to improve riparian conditions on the maximum amount of these reserves.

We would also like the Forest to consider including some of the following pieces of scientific research into their analysis. Much controversy surrounding any type of thinning in riparian reserves has surfaced, and we think the following information would be useful in justifying the kinds of beneficial treatments the Forest implements.

Stream temperature

Janisch, Jack E, Wondzell, Steven M., Ehinger, William J. 2012. Headwater stream temperature: Interpreting response after logging, with and without riparian buffers, Washington, USA. *Forest Ecology and Management*, 270, 302-313.

Key points of the Janisch paper include:

- The amount of canopy cover retained in the riparian buffer was not a strong explanatory variable to stream temperature.
- Very small headwater streams may be fundamentally different than many larger streams because factors other than shade from the overstory tree canopy can have sufficient influence on stream temperature.

Riparian reserve gaps

Warren, Dana R., Keeton, William S., Bechtold, Heather A., Rosi-Marshall, Emma J. 2013. Comparing streambed light availability and canopy cover in streams with old-growth versus early-mature riparian forests in western Oregon. *Aquatic Sciences* 75:547-558.

Key points of the Warren paper include:

- Canopy gaps were particularly important in creating variable light within and between reaches.
- Reaches with complex old growth riparian forests had frequent canopy gaps which led to greater stream light availability compared to adjacent reaches with simpler second-growth riparian forests.

(1) Small Functional Wood

Nearly all wood that falls into stream channels has the capacity to influence habitat and aquatic communities (Dolloff and Warren, 2003). Therefore, smaller woody material that enters stream channels is important to overall channel function because it can store sediment and organic material, contribute nutrients, and provide temporary pool habitat and slow-water refugia. It is important to note, however, that pools formed by smaller wood generally are not as deep or complex as those formed by large wood. In addition,

small wood does not persist for long periods of time because it deteriorates quickly and is more likely to be flushed from the system (Naiman *et al.*, 2002, Keim *et al.*, 2002).

(2) In smaller streams adjacent to previously harvested stands, field surveys (McEnroe, 2010) indicated that relatively large amounts of existing (in-stream) and potential (standing) small functional wood are present. Field surveys also indicate that the vast majority of the down wood in these areas originated from within 50 feet of the stream channel. This is consistent with findings by Minor (1997), who found that in second-growth coniferous riparian forests, 70-84 percent of the total in-stream wood was recruited from within 15 meters (49 feet) of the channel. In addition, McDade *et al.* (1990) and Welty *et al.* (2002) found that 80 percent and 90 percent, respectively, of the wood loading occurred within 20 meters (66 feet) of the stream channel in coniferous forests.

10. AFRC supports commercial harvest and the stand improvements being made in the proposed wilderness area expansion. The activities will help to fireproof those acres and enhance forest health in areas adjacent to existing wilderness areas.
11. Finally, AFRC believes that analyzing this project using an EA is appropriate since no significant impacts will occur due to operation of the project. The project will improve forest health and reduce the threat of catastrophic wildfire while improving hydrologic functions and water quality, restore stream habitat conditions and aquatic organism passage, and provide for an economically and environmentally sustainable transportation system

Thank you for the opportunity to provide comments on the Little Crow Restoration Project combined scoping and comment period with proposed Northwest Forest Plan amendment. I look forward to following the implementation of this project as it moves forward.

Sincerely,



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