



VIA Email: <https://www.fs.usda.gov/?project=49124>

March 18, 2019

Okanogan-Wenatchee National Forest
Wenatchee River Ranger District
C/o Paul Kelly
600 Sherbourne Street
Leavenworth, Washington 98826

Dear Paul:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Upper Wenatchee Pilot Project.

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 within and 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 Upper Wenatchee Pilot Project area is 75,000 acres in size including 60,000 acres of National Forest lands and is located north of the town of Leavenworth in Chelan County, Washington. The project area encompasses the Lower Chiwawa, Big Meadow, Lake Wenatchee, Beaver Creek-Wenatchee River sub-watersheds. The project is being designed to address how landscapes and watersheds have changed from historical conditions, as well as identifying activities that would make landscapes and watersheds more resilient to disturbances while considering climatic changes.

The Purpose and Need for the project is listed below:

Purpose:

- Address conditions that have departed from the historical range of variability to reduce the risk of wildfire and other disturbances to protect lives, communities, and ecological values.
- Promote better outcomes for a broad spectrum of ecological, social, and community resources and values in a manner that recognizes and responds to the important role of natural fire and helps mitigate risk in the wildland urban interface while providing for sustainable user access.
- Protect and restore watershed conditions that maintain uplands, late-successional habitat and large and old trees, riparian and instream habitat, and water quality and quantity for the benefit of communities and native fish and wildlife.
- Design and implement treatments to support the recovery of threatened, endangered, and sensitive species.

Need:

- Create and maintain successional pathways that provide the amount and spatial arrangement of forest conditions that increase resilience to natural disturbance and sustainability.
- Improve habitat conditions within Late-Successional Reserves while reducing risk to stand replacing fires.
- Maintain, enhance, or accelerate the development of large and old trees and increase proportion of old forest structure.
- Conserve the existing spotted owl and old forest habitat, and identify and implement vegetation treatments to develop additional habitat in the most sustainable landscape location.
- Support biodiversity by restoring, enhancing, and/or maintaining unique habitats including aspen, white bark pine, meadows, and huckleberry fields.
- Reduce impacts from fire and return fire as a natural element of the landscape.
- Reduce risk of fire on National Forest System lands in the Wildland Urban Interface.

While AFRC supports for the most part the Purpose and Need for this project, we believe some components of this project have been lightly touched upon or completely left out and deserve to be included in the Purpose and Need. We offer these suggestions we believe will make the project stronger and reflect some of AFRC's comments and earlier involvement with this project.

1. AFRC is extremely disappointed that managing this landscape for timber production and maintaining our forest products infrastructure isn't included in the Purpose and Needs. AFRC has been very vocal to all Forest Service personnel since the inception of this project in 2017 that this 60,000 acre landscape has the potential to yield a considerable amount of sawlog volume which is greatly needed by the Forest Products industry. In an effort to make sure providing raw materials was one of the Purpose and Needs, I submitted comments during the pre-scoping process directly to Paul Kelly and the rest of the Planning staff. Please see the email thread below to better understand why I am so very frustrated that none of my suggestions regarding the Purpose and Need for a similar Project on the Mt. Hood National Forest were considered or incorporated. I view the lack of any consideration for economics or the need for this project to provide raw material in the Purpose and Need is complete lack of understanding of our industrial infrastructure

and to the community's economic stability and how management on this project could benefit those.

From: "Kelley, Paul - FS" <pkelley@fs.fed.us>
Date: December 18, 2018 at 3:18:08 PM PST
Subject: Upper Wenatchee Pilot Project update

Upper Wenatchee Core Team members!

We are planning to begin formal public scoping for the Upper Wenatchee Pilot on January 28th. In advance of that, we'd like to share our *draft* purpose & need statement with the Core Team. It is our hope that you will see the input from our collaborative planning process reflected in this Purpose & Need statement. Although we are not asking for an official "review" of this language, we would appreciate hearing if the Purpose & Need statement accurately reflects your understanding of the project, or if you see any key elements that may be missing.

Please feel free to share this draft language with the NCWFHC steering committee and with the Upper Wenatchee work groups (aquatic, terrestrial, C&E). This statement is still a draft and has not been finalized/approved, so at this time we are not requesting help in sharing beyond these groups. We will be asking for your help in getting information out as we prepare for our official public scoping period.

We plan to finalize our Purpose & Need statement for public scoping in the next couple of weeks, so please share any questions or feedback you have with me at your earliest convenience.

Thanks again for your continued support & engagement in this restoration planning effort!
Happy Holidays!

Paul Kelley
Environmental Coordinator
509-548-2583
pkelley@fs.fed.us

USDA Forest Service
Okanagan-Wenatchee National Forest
Wenatchee River Ranger District
600 Sherbourne St.
Leavenworth, WA 98826
www.fs.fed.us

This above email from Paul Kelley was sent on December 18th to the Upper Wenatchee Core Team Members asking to share with the NCWFHC Steering Committee which I am a member. In this note Paul is requesting review and asking for any additions to the Purpose and Need statement.

On December 20th, I send the Following response back to both the Core Team Members and to the Project Steering Committee.

From: Tom Partin <tpartin@amforest.org>
Sent: Thursday, December 20, 2018 1:31 PM
To: Paul Kelley ; Pete Teigen; Thomas, Susan; Matt Comisky
Subject: RE: Upper Wenatchee Pilot Project update

Folks:

I track a lot of projects on various Forests and one of the most thorough Purpose and Needs statement came from the Mt. Hood on the North Clackamas Project. This area is similar to the Lake Wenatchee Project in that it has Matrix lands, LSR Lands, WUI, heavy recreational use because of the proximity to Portland and the Clackamas River. I think some of the key points we need to address include: 1) how we are going to manage in Matrix, 2) is the LSR lands going to be managed under fire risk or silviculture, 3) how we are going to protect the Wildland Urban interface, 4) how we are going to provide a sustainable flow of wood products, and support the local infrastructure and economies, 5) how we are going to treat as many acres as possible during this entry, and finally 6) we also need to recognize that management is needed for protection and enhancements of the spotted owl and other wildlife populations since the Forest has lost 6 times as much habitat to fire than mechanical thinning.

I would like our Planners to take a look at this purpose and needs statement from the North Clack project and incorporate some of the key points into the Upper Wenatchee. From my perspective the Upper Wenatchee represents a great opportunity to treat a high percentage of the landscape and I don't want to miss this opportunity. I think anything short of treating 50% of this landscape would be a great missed opportunity. I strongly believe we need to aim for that outcome.

Thanks for your consideration!

Tom Partin
AFRC Consultant

North Clack Integrated Resource Project Information Purpose and Need for Action and Proposed Actions

An interdisciplinary team of agency resource specialists has reviewed existing conditions within the project area against the desired conditions specified in the Forest Plan, as amended. Based on this review, Clackamas River Ranger District is proposing a variety of actions to address the needs. The North Clack Integrated Resource Project includes several different types of projects in the project area. These proposed actions are organized into the following headings: Improving Forest Health, Diversity, and Productivity; Transportation System Management and Aquatic/Riparian Habitat Enhancement. For each heading, the purpose and need is described in terms of desired conditions which are not currently being met, followed by the proposed actions which will move the landscape closer to desired conditions. Desired conditions and other management direction come from the Forest Plan, as amended.

Improving Forest Health, Diversity, and Productivity

- A. The desired condition for the matrix component of the landscape is to have live productive forest stands that can provide wood products now and in the future. This need is described in the Northwest Forest Plan on page 26 and Forest Plan on pages Four-3 & Four-26. A primary purpose of this project is to keep forests productive to sustainably provide forest products now and in the future.

The project area has been dramatically affected by multiple wildfires that have combined to create a landscape with little to no old growth and vast areas of second growth. Some of the second-growth fire-originated stands are 60 to 70 years old and some are 100 to 120 years old depending on fire burn patterns. There are also some more traditional looking plantations that range from 25 to 70 years-of-age. Approximately 5,000 acres of fire-originated stands have been thinned in the past few decades and several thousand acres more exist in the project area that have never been thinned. Most of these stands are currently in a condition where thinning treatments or regeneration harvest treatments may be appropriate to move stands toward the desired conditions which are unique for each land allocation.

An important element of this purpose and need is to deal with as many mid-aged stands as possible within the parameters of the Forest Plan to move them toward desired conditions in an operationally efficient manner.

The proposed actions described in the sections below provide forest products while achieving several other stand and landscape scale objectives. There is additional detail below under the heading, "Provide Forest Products."

- B. Another desired condition is to have stands that are relatively healthy with growth rates commensurate with site capability. This desired condition is discussed in the Forest Plan on pages Four-3, Four-5, Four-26, Four-91 & Four-289. There are many stands in the project area that are overcrowded and relatively uniform. A primary purpose of this project is to improve the health and increase diversity of forested stands.

There is an opportunity to gain greater variability of vertical and horizontal stand structure by the inclusion of skips, gaps in the thinning prescriptions. This technique to develop non-uniform conditions in a stand is an example of variable-density thinning. Thinning is proposed on various land allocations; each with a different emphasis. The features of variable-density thinning will vary between units to achieve the differing goals of each land allocation.

For example, in Riparian Reserves and Late-Successional Reserves there is an opportunity to make some of these changes to accelerate and promote desired conditions in these land allocations. The desired condition in reserves is a multi-layer canopy with large-diameter trees, a well-developed understory, more than one age class, and sufficient quantities of snags and down woody debris. These desired conditions are described in the Forest Plan on page Four-67 and in the Northwest Forest Plan on pages B-5, B-6 and C-32.

In the Matrix land allocation, particularly where it overlaps the C1 Timber Emphasis land allocation, the emphasis of thinning is for timber production, health and growth. The Forest Plan also includes objectives and Forest-wide Standards and Guidelines that apply to all Matrix land allocations for the enhancement and protection of many resources. Some of these other resources can be enhanced by the incorporation of variable-density thinning and other treatments, such as underburning, that are designed to achieve timber production, health and growth goals while at the same time achieving other objectives such as owl habitat, enhancing forage for deer and elk, providing scenic views, and promoting huckleberry productivity. There is additional detail below under the heading, "Enhance Wildlife Habitat."

Some of the fire-origin stands have scattered legacy trees that survived the fires; these large live fire-scarred trees would be retained. Some stands also contain large-diameter snags that have been dead for a century, most of which are crumbling down. Snags would be retained unless they pose a safety hazard.

- C. One desired condition for this area is to have forest stands across the landscape with a mix of ages and densities. Within this mix is early-seral habitat that would provide for dependent species including forage for deer and elk. This desired condition is discussed in the Forest Plan on pages Four-22 & Four-71. The project area is a relatively uniform landscape with an abundance of second-growth stands. In recent years, early-seral habitats have declined across the project area. Deer and elk are management indicator species that require a mix of habitat types, including early-seral habitats that provide forage. A primary

purpose of this project is to change that uniformity by introducing regeneration harvests that result in variable-looking early-seral stands.

- D. While achieving the primary needs discussed above, there are additional opportunities to alter vegetation to meet other objectives as well.

One such opportunity is to reduce hazardous fuels to minimize resource impacts from fire, and to provide for enhanced firefighter and public safety. The desired condition is to have a landscape of primarily live trees with relatively low fire hazard. The project area has had a history of repeated fires and there is a concern that fires could start within, and spread out from adjacent wilderness areas. There is also an adjacent wildland-urban interface that is a concern. The goal is to have an appropriate fire suppression response on the stands in the project area. These desired conditions and goals are discussed in the Forest Plan on pages Four-3, Four-4, Four-9 Four-25 & Four-76. The proposed action would treat activity fuels in some harvest units and create fuel breaks along a portion of Road 4610 and along the Forest boundary.

Another opportunity is to reduce the occurrence of invasive plant species, particularly where they are at risk of spreading and competing with native vegetation. The desired condition is to have a landscape where ecosystem-altering invasive plants are not present and where common invasive plants are kept in check. These desired conditions and goals are discussed in the Forest Plan on pages Four-82. The project area has some concentrations of Scotch broom and other invasive plants that may spread from their typical occurrence along roadsides into forest stands where they would compete with desired vegetation. The treatment of invasive plants is covered by the "Site-Specific Invasive Plant Treatments for the Mt. Hood National Forest and Columbia River Gorge National Scenic Area in Oregon, including Forest Plan Amendment #16" FEIS, which was completed in 2008. This FEIS identifies appropriate herbicides and non-herbicide treatments for sites that were known at the time, and includes an Early Detection / Rapid response strategy for uninventoried and newly established populations. The North Clack Environmental Assessment will not revisit the decisions made in 2008, but will identify areas of potential treatment so that they may be coordinated with other proposed actions. There are some concentrations of Scotch broom, herb Robert, Canada thistle, bull, thistle, tansy ragwort, St. John's-wort, and other invasive plants that were discovered during project reconnaissance.

2. AFRC requests the Forest consider treatments in all stands in the project area that are out of the Historic Range of Variability because of high fuels build up, insects or disease, or creating a wildfire risk in the Wildland Urban Interface (WUI). The project area contains 60,000 acres and presents a large opportunity for the Forest to increase the pace and scale of management. The volume of timber removed from this project will create many jobs in rural communities within the bounds of the Okanogan-Wenatchee and outside of the Forest's boundaries. For every one 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 Upper Wenatchee could help maintain those milling facilities that depend on wood from the Forest and will also help support the existing logging infrastructure.

3. Furthering the discussion of the lack of recognition of forest management and timber volume removal from this project, I want to draw to the Forest's attention the efforts of The Nature Conservancy at many of our North Central Washington Forest Health Collaborative meetings to bring new milling infrastructure into the bounds of the Okanogan-Wenatchee National Forest. TNC has shown that with the Forest stepping up their timber production on acres that are available for management and currently in need treatment there could be enough volume to operate a new facility.
4. AFRC consultant Tom Partin is a co-chair of the NCWFHC. On January 15, 2019 NCWFHC sent a letter to the Upper Wenatchee Planning team with suggestions to the Purpose and Needs statement. A copy of that letter is attached. In that letter was the inclusion of the following language: *"Produce social and economic benefits for local communities, such as employment opportunities, wood products, and reduced risk of uncharacteristic wildfire behavior, through active restoration of aquatic and terrestrial ecosystems."*

AFRC believes the Planning team for this project is completely out of sync with other partners in this project especially in the development of your Purpose and Needs statement. This UWPP has the potential to improve many resources and the driving source of dollars for these improvements will be dollars paid for timber stumpage. By not acknowledging this and incorporating into your planning the Forest could miss huge opportunities for resource improvements on a multitude of fronts.

5. One of the purposes of this project is to make the Forest and wildlife habitat more resilient and restore native disturbance regimes. Focusing on the resiliency allows the Forest to thin in LSR areas over 80-years in age. The Forest should take every opportunity to do this. The US Fish and Wildlife has acknowledged that about nine times as much spotted owl habitat has been lost to wildfire as has been treated by mechanical methods for stand improvement.

AFRC supports the Forest's request for a project-specific amendment that would allow the project to meet habitat restoration and risk-reduction objectives. Specifically, the project would amend the NWFP silviculture standard that prohibits harvest of trees in stands over 80 years in late-successional reserves (NWFP ROD, C-12). AFRC does not support limiting the amendment to 2,000 to 3,000 acres. With this small number of acres being treated to ensure resiliency, the Forest is not meeting the purpose or need of this project.

Over the past several years many Forest Service projects have been scaled back in scoping to a reduced level of acres treated due to perceived effects to the northern spotted

owl. We encourage the Okanogan-Wenatchee to consider a 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 (NSO) 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.

6. A number of streams and drainages are present in the planning area and AFRC strongly encourages the Forest to enter into the riparian areas to remove some of the fuel loading and cover. Recent large wildfires have shown that some of the most severe burns and resource damage have occurred in the riparian areas where the fuel loads are the highest. Creating openings in the riparian areas also allows more sunlight to enter which can enhance other vegetation and insect production for a variety of species that depend on them for food.

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 Service 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. 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.

7. No discussion of the land allocation within the project area is given in the scoping document and it is hard to tell from the map if any matrix land is included in the project area. If matrix land is in this project, AFRC suggests treating all of those acres mechanically with the intent of reducing fire risk and improving wildlife habitat. Since this area is also important for deer and elk species, treatments should include regeneration for the creation of early seral vegetation for big game forage.
8. The Risk of Crown Fire Map in the document shows that much of the area is in moderate to high risk of wildfire. The Forest should take every opportunity to treat as many of the acres in these areas to reduce the risk of crown fire. There is a lot of WUI in the project area, and the Forest should look at doing heavy treatments along these property lines to prevent wildfires from destroying private property and/or lives. The history of huge fires in this area is well known. During the summer of 2016 shaded fuel breaks were put in to protect residences from the Wolverine fire which was burning several miles away, but had the potential with the right conditions to burn much of the private land and homes in the Lake Wenatchee area.
9. AFRC further suggests that in those areas being treated for fire resiliency and enhancement of large and old tree development, commercial 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 or more, the stands should be thinned to a spacing that will provide for maximum growth and forest health for that time period.
10. AFRC suggests using tractor skidding on slopes over 35% to more efficiently capture the economic value of the timber and to provide more revenues back to the Forest for other resource improvements. The nearby Colville National Forest is testing skidding on slopes up to 45%. Additionally, many acres have been bypassed in the past because of concern about damage to soil from compaction, erosion and other issues. Today's new high tech logging equipment has a very light footprint and damage to the soil resource is minimal.
11. AFRC suggests minimizing the operating restrictions placed on this project. With the urgency to get acres treated it would be unwise to burden the purchaser with short operating windows that may prevent or prohibit the project from being completed in a timely manner. Some AFRC members have stressed that a heavy component of winter logging can exclude bidders due to seasonal highway closures.
12. AFRC suggests looking more at the use of DxP for any commercial thinnings. We believe that better results can be achieved in a much more efficient, and cost effective manner by utilization of basal area thinning. Many forests are now using DXP almost exclusively including the Colville National Forest.

In closing, I would like to remind the Planning team of the UWPP that the Okanogan-Wenatchee has not hit their timber target in several of the last few years. There are many reasons for this, but a couple include not treating large acres of the planning areas, and only

removing small volumes of timber per acre. The UWPP presents a great opportunity to actually manage the Forest for the benefits of fuels reduction, aquatics improvements, big game habitat, road system improvement, and sawlog production. I strongly encourage the Forest to pursue a plan that will accomplish all that is needed.

Thank you for the opportunity to provide scoping comments on the Upper Wenatchee Pilot Project. I look forward to following the implementation of this project as it moves forward.

Sincerely,

A handwritten signature in cursive script that reads "Tom Partin". The signature is written in dark ink and has a fluid, connected style.

Tom Partin
AFRC Consultant
P.O. Box 1934
Lake Oswego, Oregon 97035