



VIA Email: <https://cara.ecosystem-management.org/Public//CommentInput?Project=53450>

May 28, 2019

Scott Tangenberg, Acting Forest Supervisor
c/o Rachel Wirt
Cle Elum Ranger District
803 W. 2nd St
Cle Elum, WA, 98926

Dear Rachel:

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

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 Taneum Project area is 21,700 acres and is located approximately 10 miles south of Cle Elum in Kittitas County. The Taneum Restoration Project area includes the South Fork Taneum Creek and North Fork Taneum Creek drainages, and a portion of USFS land in the main Taneum Creek drainage. On July 27, 2018 AFRC provided scoping comments on this project. In that letter we discussed the fact that we support both the Purpose and Need, but had some important additions to the scoping document.

The **Purpose** for this project which includes:

1. Reduce the risk of habitat loss to uncharacteristically severe wildfire by making habitat more resilient and restore native disturbance regimes influenced by past management and a changing climate. Restore habitat to contribute to the recovery of listed wildlife species, in particular the northern spotted owl, and the viability of late-successional and old forest associated species.

2. Integrate aquatic and terrestrial restoration actions to restore watershed functions, restore native plant diversity, and build more resilient and sustainable ecosystems.
3. Improve riparian, stream, and upland processes that influence stream and watershed functions and resiliency, and substantially contribute to the recovery of listed fish species (steelhead trout and bull trout) and their critical habitats.
4. Provide a transportation system that is affordable, safe, and efficient for administration, public use, and protection of National Forest System lands while also providing high quality recreation experiences and access for forest management.

The **Need** for treatment across the landscape are many including:

1. Vegetation Need (Composition and Structure).
2. Watershed (aquatics) Condition Need (Processes, Functions, and Patterns; Recovery of Listed Fish Species).
3. Wildlife Habitat Need (Functions and Patterns; Recovery of Listed Wildlife Species).
4. Fuels and Disturbance Regime's needs.
5. Access and recreation infrastructure needs.

AFRC is disappointed that several of our comments were not included in the Draft EA. Those issues and other important perspectives from AFRC are listed below:

1. While AFRC supports the purpose and need for the project, we suggested there should be included a need to enhance and protect the existing sawmilling infrastructure. To get much of the work done in this project, the Forest is going to need a healthy and strong forest products infrastructure. Consideration should have been given to maintaining and growing that industry. AFRC pointed out that we participate in both the NCWFHC and LNWG collaboratives. Both of these collaboratives have acknowledged the importance of a vibrant forest products community and the need to provide raw material for their operations. Since several sawmilling operations within the Okanogan-Wenatchee working area such as Boise Cascade in Yakima, and Longview Fibre in Leavenworth have shut down in recent years it would seem this issue should be a focus and a part of every project being proposed on the Okanogan-Wenatchee National Forest. Studies have shown that for every one million board feet of timber harvested approximately 12 jobs are created. Further, resource restoration work comes from the revenues timber companies pay for the wood products. More restoration work can be accomplished when a healthy competition from several timber companies is present as bidders for the timber thus generating more revenues.
2. AFRC is confused regarding your handling of our request to Maximize Timber Production. In the Draft EA the Forest stated: *they considered an alternative that maximized timber production, but determined that this alternative is not consistent with the management direction for LSRs that includes no scheduled timber harvest. Timber harvest in an LSR can only be used as a tool to achieve late-successional habitat objectives or to reduce the risk of the loss of late-successional habitat to high severity wildfires. In addition, an alternative to maximize timber production would not be consistent with the project purpose and need. Therefore, this alternative was eliminated from detailed study.*

AFRC believes that maximizing timber volume in this project is consistent with achieving late successional habitat and reducing the risk of fires by simply treating more acres of the LSR and removing more volume per acre. Regarding acres commercially treated, the Draft EA calls for only treating 2,095 acres commercially when the scoping document considered as many as 3,000 acres. This means the Forest will only treat 9.6% of the acres within this project commercially. AFRC has raised this issue of treating so few acres on individual projects many times on the Okanogan-Wenatchee National Forest and we believe this has led to sales going no-bid, a shortage of funds to do the restoration work, and quite frankly an inability to complete the work you have outlined in your purpose and need statement.

3. AFRC is disappointed that the Forest has decided to use a maximum dbh of 8” in the shaded fuel breaks along the following existing roads: 3300, 3350- 119, 3330, and 3350-111, except where it intercepts suitable habitat (NRF) for the northern spotted owl. There is certainly nothing preventing the Forest to use a larger diameter limit that could yield commercial timber during this operation. Again, AFRC believes this conservative approach to limiting timber harvest also limits the amount of restoration work that can get completed because instead of generating revenues on these acres from the harvest of merchantable trees it will take revenues to get the work done.
4. There are 2,100 acres of Riparian Conservation Areas in the project area. In the scoping document the Forest was considering thinning approximately 300-400 acres of previously treated stands. The Draft EA has further reduced that number to 245 acres. Again, another example of being too conservative and not accomplishing the Purpose and Need for this project.

In our scoping comments we asked the Forest to consider scientific research regarding Riparian Conservation areas. Specifically, we asked that you include the work by Janisch et.al and Warren et.al in your analysis. In looking at Appendix F-Literature cited, I did not see where you referenced either of these reports. They again are listed below:

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.

5. It appears that there is approximately 320 acres of matrix in this project area. AFRC suggests treating these acres during this entry. This would fit under the purpose and need by improving vegetation composition and structure, improving wildlife habitat needs including functions and patterns, and lowering fuels and disturbance regime's needs (Fuels Reductions).
6. 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. Also, to benefit big game, the Forest should focus on creating openings to produce early seral plants for deer and elk.

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.

While the Forest did use one study by Irwin and Rock et. al. we encourage the Okanogan-Wenatchee to consider another 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.

7. AFRC supports Alternative 3 which has less helicopter logging (310 acres), but does rely on more temporary roads for access to more ground based and skyline logging (4.8 more miles of temporary roads). Helicopter logging as we have pointed out has almost become cost prohibitive and getting a helicopter company to commit to getting the job done is difficult as well. Minimizing the treatment acres using helicopter will be helpful.
8. 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.
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. AFRC favors only leaving the minimum 20 trees per acre and believe that 40-50 leave trees will create dense stands again in the short-term.

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. This could be very effective in areas that the Forest decides to treat with ground based systems rather than helicopter.
11. AFRC again 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 road closures.

Thank you for the opportunity to provide Draft EA comments on the Taneum 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 is positioned to the left of the typed name.

Tom Partin
AFRC Consultant
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