

From: [Tveten, Richard K \(DFW\)](#)
To: [Bernatowicz, Jeffrey \(DFW\)](#)
Cc: [SEPADesk2 \(DFW\)](#)
Subject: Colockum project comments
Date: Thursday, March 3, 2022 12:23:06 PM
Attachments: [image002.png](#)

Dear Mr. Bernatowicz,

Thank you for taking the time to express your concerns regarding the Colockum Restoration Thin Phase 1 Restoration Project. Below are responses to your concerns.

Comment 1: The project proposes to benefit multiple wildlife species by thinning the forest to 25-45 trees per acre but does not list the species. As the Wildlife Biologist for the area with almost 30 years with WDFW, I do not know of many species that will benefit from the project.

Response: This proposed project doesn't target a short list of specific species. Rather, it is intended to benefit a broad spectrum of species by helping bring site conditions back into alignment with the historic range variability, restore ecological integrity and reduce the severity of future wildfires so that the remaining forest are less likely to be severely burned in megafires like the recent Colockum Tarps (81,738 acres), Table Mountain (42,482 acres), Wenatchee Complex (19,998 acres) and Snag Canyon fire (12,596 acres). Collectively these fires have burned more than 245 square miles of land and killed large swaths of forests within a 20 mile radius of the site in the last ten years alone.

Comment 2: The area used to support spotted-owls, but none have been seen since the late 1990's due the reduction in complex, multi-layered, closed canopy forest.

Response: Multiple factors have contributed to the decline of owls including competition from barred owls and the reduction in complex, multi-layered, closed canopy forest. Wildfire poses a tremendous risk to persistence of complex, multi-layered, closed canopy forests on the Colockum Wildfire Area. Our intention is to increase the overall availability of suitable owl habitat over time by restoring landscape-level resiliency via strategically located projects. While it is true that the project site once contained an owl nest site, we believe that there are better places to focus on developing and maintaining northern spotted owl habitat when we consider the following:

- The historic owl site center was only hundreds of feet from the shrub steppe ecotone.
- The next nearest owl site center is 6.5 miles to the west and 1,200 feet higher in elevation.
- The nearest Spotted Owl Special Interest Area (land with specific goals to provide for demographic and/or dispersal support as to complement the northern spotted owl protection strategies on federal lands is 14.5 miles to the west and at higher elevations.
- Part of the project is less than a mile from the perimeter of the 2013 Colockum Tarps fire which demonstrated how severely overstocked low-elevation forests are apt to burn without restorative treatment (see Photo 1).



Photo 1

Comment 3: Flammulated owls were found in the vicinity (pre-fires) in 2012. Flammulated owl status is unknown, but the literature strongly suggests the prescription will be detrimental to the species (Table 1).

Response: This project is consistent with WDFW's recommendations for flammulated owls in *Management Recommendations for Washington's Priority Species – Volume 4: Birds* at: <https://wdfw.wa.gov/sites/default/files/publications/00026/wdfw00026.pdf>.

Consistent with the following excerpts from that document, this project will promote more open, brushy habitat with larger trees, yet retain numerous dense skips (See the below response to comment number 6), create snags, and encourage the development of large trees to promote flammulated owls.

- *Page 24-1. Flammulated owls are typically found in mid-elevation coniferous forests containing mature to old, open canopy yellow pine (ponderosa pine) ...*
- *Page 24-2. In Oregon, individual home ranges averaged about 10 ha (25 ac) (Goggans 1986). Territories are typically found in core areas of mature timber with two canopy layers present (Marcot and Hill 1980)... Core areas are near, or adjacent to clearings of 10-80% brush cover (Bull and Anderson 1978, Marcot and Hill 1980). Linkhart and Reynolds (1997) found that flammulated owls occupying stands of dense forest were less successful than owls whose territories contain open, old pine/fir forests.*
- *Page 24-3. Uneven stands of open mature and old timber located near brushy clearings provide good habitat for flammulated owls.*
- *Page 24-4. 24.2 Linkhart and Reynolds (1997) found that flammulated owls occupying stands of dense forest were less successful than owls whose territories contain open, old pine/fir forests.*

Comment 4: If the majority of the area was closed canopy, the project would benefit wildlife by adding opening and diversity. Unfortunately, this is not the case. The majority of the area is extremely open habitat. This leads to lower diversity of species. Even before recent fires, closed canopy forest types were in short-supply. Recent fires (attachment) and thinning projects have made further reduced the number of suitable stands for closed canopy dependent species.

Response: While there are a lot of open ridgetops near the forests, our analysis indicates that where forests are present, the proportion of dense forests as opposed to open forests is high compared to the historic range of variability. The forest ecologist's in DNR's Forest Health and Resiliency Program also completed a watershed-level for the Stemilt/Squilchuck basins and estimated that 9,200-13,600 acres of forest treatments are needed to improve landscape resiliency, enhance forest health and restore habitats.

<https://deptofnaturalresources.app.box.com/s/ejg0hx8I9n6uj5bfeocwd9km0qwme4eg/file/748728256020>.

[The map that you attached illustrates the need for action as all remaining forests could burn in a single megafire if we don't do enough to restore resiliency.](#)

Comment 5: Building new road and further reducing cover will be detrimental to wolf survival in the area.

Response: While not known to be on the project site, you are right that there are wolves in the general area. Thank you for pointing that out. In consideration of the following excerpt from WDFW's Wolf Conservation and Management Plan at:

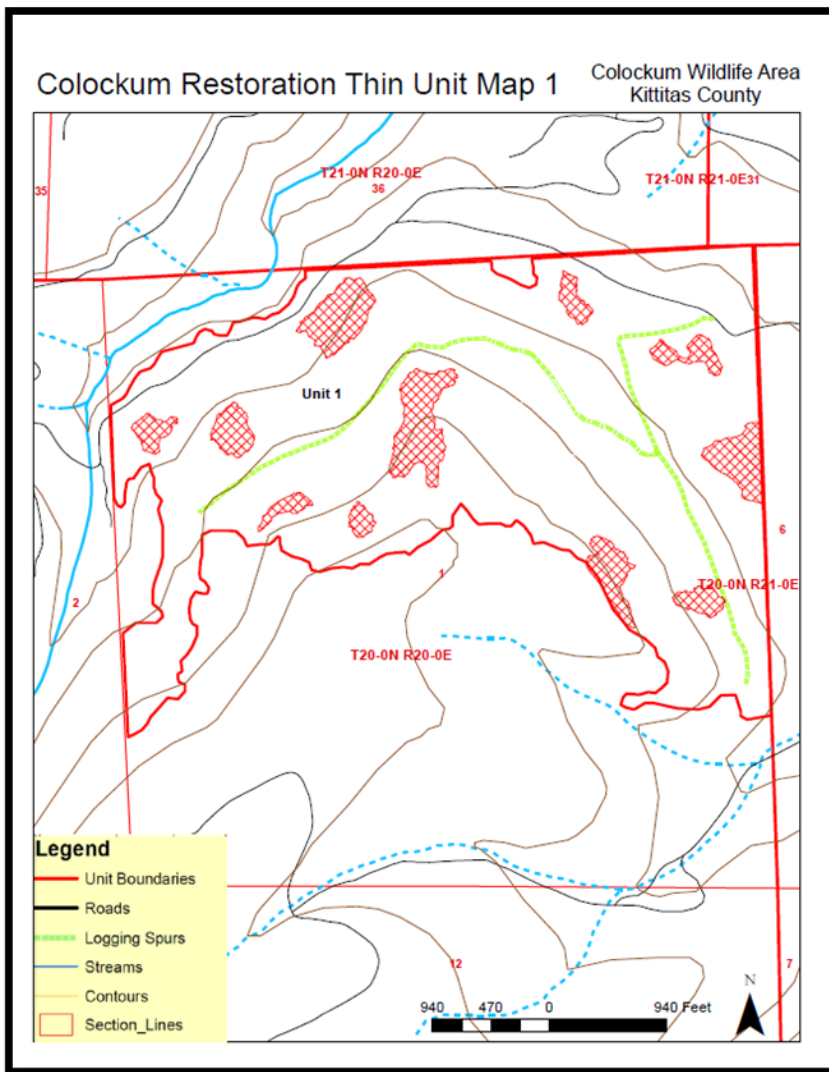
<https://wdfw.wa.gov/sites/default/files/publications/00001/wdfw00001.pdf>

we don't expect the project to negatively impact wolves.

“Gray wolves are habitat generalists and one of the most adaptable large predators in the world (USFWS 2009). They require only a sufficient year-round prey base and protection from excessive human-caused mortality. Wolf populations are able to persist in many parts of the world featuring greater human development than the northwestern United States (Boitani 2003). Even active wolf dens can be resilient to non-lethal disturbance by people (Thiel et al. 1998, Frame et al. 2007, Person and Russell 2009). In parts of the species' range (e.g., in northwestern Montana), wolf packs use a matrix of public, private, and corporate-owned lands where a variety of land uses occur, including dispersed outdoor recreation, timber production, livestock grazing, home sites within the rural wildland interface, hobby farming/livestock, and even full-scale resort developments with golf courses.”

Comment 6: I did not fully understand the project as the map legend did not contain a key for cross-hatched. I am assuming leave clumps, but that detail should be added.

Response: We apologize for not defining the cross hatching in the map legends. The cross hatched areas are large skip areas where forests will not be thinned to provide dense forest habitat for species like flammulated owls (Unit I map shown below as an example). These large skips are in addition to smaller leave clumps that are too numerous to map.



Richard Tveten
Washington Department of Fish and Wildlife
Forest Management Team Lead
360-902-2367