



Date: Jan 12, 2016

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**Re: DNS 15-065: OKANOGAN COMPLEX FIRE FOREST MANAGEMENT**

Please accept these comments on the above DNS proposed by Sinlahekin Wildlife Area, submitted on behalf of Conservation Northwest.

When the DNS and SEPA Checklist was released, the listed objectives were:

1. Favor better survivorship and release trees from less vigorous competitors to increase resource availability;
2. Protect surviving trees by reducing the severity of bark beetle infestation;
3. Reduce long term large woody debris accumulations that lead to loss of access and habitat for grazing species;
4. Reduce safety and access issues for recreational and commercial uses;
5. Protect surviving trees and regeneration by reducing long term fuel loading outside the historic range of variability;

Three treatment prescriptions were developed for low mortality sites, high mortality sites and aspen sites. At that time we asked forester Jamie Bass for more detailed prescriptions which we are commenting on here, as well as providing initial comments to guide the process.

Our initial comments consisted of a brief list of the following points. These have minor edits and are combined with new comments where noted.

**1. Introduction.** This was a mixed severity fire occurring in a fire regime that should have been low severity. The range of severity in the DNS was from unburned to high severity with units directed toward areas that experienced high severity. We would like to see more specific description of the fire and add that it was the Lime Belt part of the Okanogan Complex Fires that is being treated. It would be appropriate to describe how firefighting and prior conditions may have contributed to the conditions at the time of the fire if they did. This would better explain and help to justify whether the treatments will accomplish goals 1, 2 and 5 above.

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**2. Improve survivorship.** We agree that it is appropriate to favor better survivorship in future fires. This should also be tied to natural seeding and regeneration, which will cause a pulse of vegetation over the next decade, along with increased fuel hazards that nature would take care of with a follow-up burn. Ignoring this we just repeat the same old problems that led to the fires.

**Added comment 2.b.** We also note that significant areas within the project area are not forested or are forests invading shrub steppe. We discussed this on a call and agreed that there should be an exemption from strict interpretation of stocking guidelines in some of these areas.

**3. Goal to favor survivorship by reducing post-fire bark beetles.** Goal 3 to reduce future bark beetle infestations is at odds with goals of the Washington Department of Fish and Wildlife. Admittedly this is a complex issue and therefore detailed explanations need to be provided. Temporal issues are very important over the course of an infestation. What is true one year won't necessarily be true the next. For instance, the 2014 Carlton Complex fires did not have the really bad bark beetle attacks in comparison to say, the 2006 Tripod Fire. Bark beetles are an important and necessary part of the ecosystem. They are the decomposers that break down wood and create soil. They are the primary source of food many species, e.g., the black-backed woodpecker, which is highly dependent on having high mortality fires for its survival. The picture provided to justify the reduction of bark beetles showing pitch tubes appears to show a tree that is too late to save; therefore if that is typical of these stands then beetle reduction is already a moot issue.

There are silvicultural options that could accomplish this goal without logging, for instance favoring a species that is less susceptible to whatever beetles become abundant or favoring deciduous species (including aspen, shrubs and grasses). This could also result in leave trees retention patches being chosen from already dead trees, and using Individuals, Clumps and Openings marking (ICO) to determine where patch retention should be favored over retaining individuals. In any case, there needs to be a more quantitative presentation of the monitoring results for beetle presence and trends.

**4. Improve wildlife access by selectively removing coarse woody debris (CWD).** We are in favor of this part of the suggestion but would rather see the CWD left on site for habitat needs. Logs and snag jackpots are used by animals as shelter, food and nutrient cycling. If wildlife are truly being impeded, there should be monitoring to justify this objective. The purpose and need should describe what species will benefit and what species might not benefit (for instance those that use logs that are not retained) and if so there should be a mitigation component.

We would favor an increase in bighorn sheep range as a part of this objective.

We would like to see a description of plans in case wildlife or cattle become a problem in these units, perhaps because they have been relocated to other sensitive areas while this area recovers or perhaps because they are using the area too soon after the disturbance.

**5. Safety and access issues.** The use of directional fell-and-leave logging should stay in the prescription tool box. If summer ground-based logging is to be used then dozer-piling could produce unacceptable impacts to the soils which are very sensitive to disturbance following fires. At the least there should be designated skid trails and areas protected from any soil disturbance, including walking.

**5.b. Soil disturbance.** Restoration funds should be requested for this project and used to help pay for hand piling, which should wait at least a year until the soil has healed. Ground-based mechanical piling and yarding requires a lot of mitigation like yarding over the logs, designated skid trails and low-impact equipment. Note that low-impact equipment can be hard to find. Tonasket Ranger District has a rubber-tracked forwarder that Matt Marsh obtained and it might be available for this project. If this area is logged over frozen ground or 2 feet of snow, this would mitigate a large part of our concerns about soil disturbance.

**6. Detailed prescriptions.** We appreciate the detailed prescriptions for the project. Can you explain why you are focusing on retaining ten-inch diameter trees? How about focusing on the largest trees? The project should add that trees and snags with woodpecker holes should be retained even if they are not as sound. There should be snag and log targets.

**7. Historic range of variability.** If you are going to justify this project based on meeting the historic range of variability (HRV), then you need to be prepared to treated the area more frequently. A number of recent land management plans indicate that more frequent burns, even as often as 10 years, may be necessary to mimic this fire regime (personal communication Mark Morris, Tonasket District, regarding the Lyman Lake controlled burns). Also, single burn treatments without thinning may not actually accomplish fuel reduction sufficient to make a long term difference.

**8. Natural regeneration plantings.** We appreciate the use of an alternative replanting procedure that will be more in line with the fire regime and historical vegetation, realizing that a long term reconciliation of policy and ecology still needs to occur.

**9. Sensitive plants.** Speaking from my experience as a botanist, I have found that most TES plants benefit from fire and post-fire landscapes, but it is ground disturbance, weed invasion and short-term grazing impacts that are the big threat. Please address noxious weeds, and particularly how are you going to ensure that hounds tongue doesn't go ballistic. We are aware that St. John's wort is well established and not practical to try to eradicate, however you should make an effort to acquire some new populations of Chrysolina beetles every few years to renew their genetic ability as St. John's wort herbivores. I recommend discussing whether it might be worthwhile to reintroduce the native strain of *Hypericum formosum* var. *souleri*, which is supposedly native here.

**10. Seed mixes.** Please publish the species mix of native plants and consider planting at least 2 times or even three in case of a hot summer like this year when germination doesn't occur. Make sure that you actually get the certification from Washington Department of Agriculture that all mixes have been assayed and are actually 100% free of noxious weeds.

The following comments were developed after our initial discussions.

**11. Aspen Prescription.** We appreciate the retention of all pre-settlement conifers. In areas where there are no pre-settlement conifers present, you should consider retention of 1 to 5 trees / acre of mature conifers (100-150 years) for old growth recruitment trees.

**12. Introduction.** The disclaimer that "no subsequent re-entries are anticipated" should not be interpreted that thinning through controlled fire will not be considered on a more frequent basis.

**13. Fire severity.** Conservation Northwest looked at soil burn severity maps produced by the Forest Service BAER, and Okanogan Soil Conservation District BAER teams as well as our own in-house mortality determinations based on the normalized difference vegetation index (NDVI). The first two severity maps are compared in Figure 1 and the third (mortality map) is shown in Figure 2 overlaid on the northwest project units. All three maps are similar and indicate that the units experienced both high and low severity fire.

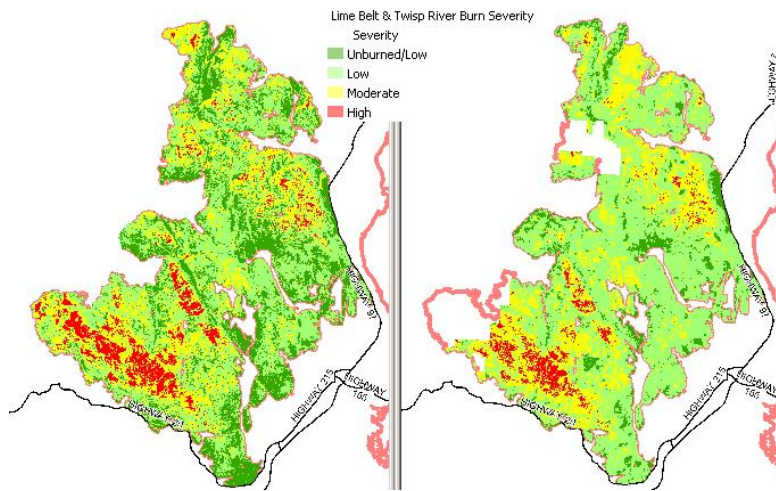


Figure 1. Comparison of the Forest Service (left) and Soil Conservation District (right) soil burn severity maps.

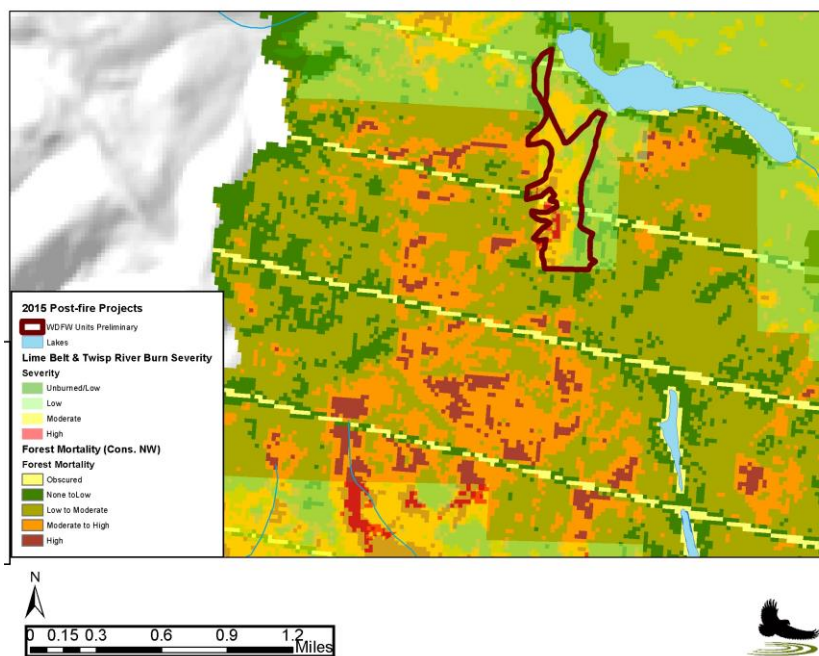


Figure 2.

Figure 2 shows that the Northwest unit (Spikeman, near Fish Lake) has low mortality on the east side of the unit. After our field visit, the high mortality prescription makes sense west of the road through the middle of the unit, but not east of the road, which should be low severity. The use of the low-severity prescription within the Spikeman unit should be acknowledged. Of course, we understand that the final determination should be field-based and not based on remote sensing.

Figure 3 shows the southern unit (Lime Belt) fire severity. This shows that the mortality is much lower on the west side of the unit. This area is a mix of dry forest and shrub-steppe, that would have historically had higher amounts of low severity (Figure 4). In this case, we would support returning this area to its HRV where it was formerly shrub-steppe. This may require a more frequent set of controlled burns.

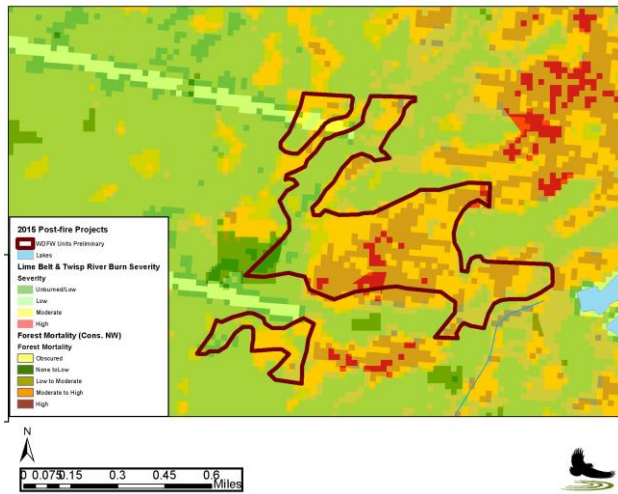


Figure 3. Fire severity in the Lime Belt Unit

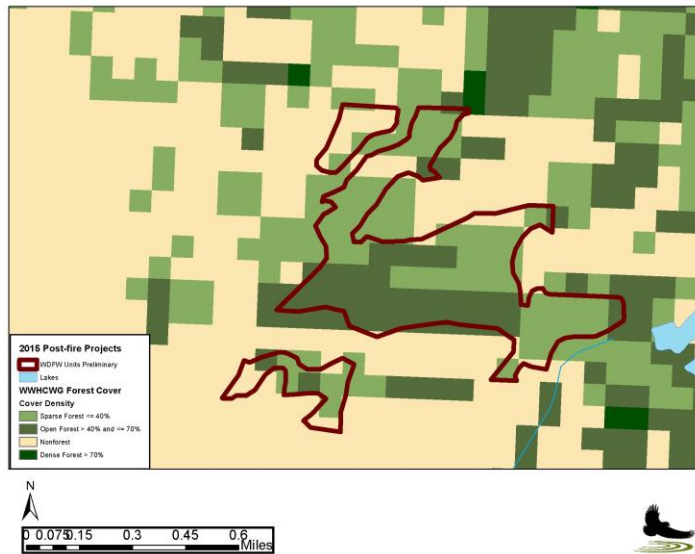


Figure 4. Vegetation in the Lime Belt Unit (Washington Wildlife Connectivity Working Group)

**14. References.** Attached please find another set of comments that Conservation sent on a proposal to log the Colockum Wildlife area after fire. This is included for its extensive references that substantiate our comments.

Thank you for your consideration.

Sincerely,

*George Wooten*

George Wooten  
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