



Date: October 10, 2016

From: George Wooten
Conservation Northwest
226 West Second Ave.
Twisp, WA 98856

To: SEPAdesk2@dfw.wa.gov
Jamie.Bass@dfw.wa.gov

Re: DNS 16-061: METHOW FOREST HABITAT RESTORATION

Please accept these comments on the above DNS. These comments are submitted on behalf of thousands of Conservation Northwest members.

Conservation Northwest supports projects that help connect and protect habitats from the coast to the Rockies. We support the concept that this project is in line with our mission and is a high-priority need for ecosystem management related to wildfire potential and overstocking, which will involve commercial and non-commercial thinning.

Although controlled fire is shown covering a large area on the maps, it is only briefly described in the DNS. We feel that more information should be provided about the type of controlled fire that is being planned, particularly on what type of target mortality you will be seeking, when it would occur, and whether it will be manual or aerial ignition?

The DNS was not clear on whether the non-commercial thinning includes controlled fire or whether that is a separate action. Does the post-thinning mortality allowance include controlled fire mortality or not? From past experience we have found that if controlled fire is a separate action, it sometimes does not get accomplished once project funds are spent. Our support for this project as ecosystem management is contingent on providing a guarantee that the planned controlled fire will indeed occur, regardless of when the commercial thinning occurs.

We note that the risk of erosion described in the Checklist was not very specific. In addition to the mitigation measures proposed in 1.h. there should be more specific descriptions of where risks will require logging on frozen ground and more specific descriptions of the mitigation measures. The Checklist omitted inclusion of what are the logging standards to avoid ground-based impacts, including (1) harvest system; (2) monitoring of frozen ground depth prior to logging over frozen ground; (3) using appropriate setbacks from streams and; (4) restricting ground-based logging on steep slopes; (5) descriptions of temporary stream crossings and; (6) location of temporary roads.

Based on a consensus across the region, ground-based logging should be limited to slopes > 35% (e.g., refer to Mission Project objectives on USFS lands). On slopes > 35%, or in areas with unstable slopes, ground-based equipment should be restricted further than the sediment delivery zone, or 300 feet from perennial channels. We identified areas where 300-foot buffers may be appropriate (Figure 1), on steep slopes with steep channels on the ridge south of Ramsey Creek. We appreciate that you

Web and email

conservationnw.org
facebook.com/ConservationNW
info@conservationnw.org

Bellingham office

1208 Bay Street, #201
Bellingham, WA 98225
360.671.9950
360.671.8429 (fax)

Seattle office

1829 10th Ave W, Suite B
Seattle, WA 98119
206.675.9747
206.675.1007 (fax)

have tried to protect this area from erosion by restricting most treatments here to controlled fire and non-commercial thinning, but several areas appeared to have been omitted from the Checklist or maps.

The proposal to reduce stream bank erosion on temporary stream crossings needs to be quantified. There is no quantitative measurement of how long it will take for temporary erosion increases to return to levels at or below the present. Likely this sort of generalization would not meet the regulatory agency requirements for protecting endangered species that live directly downstream. The description of bankside waterbars sounds counterproductive, and there is no evidence that they will do more harm than good, or if they will work to restrict ATVs.

It is not clear whether the restrictions also preclude building roads or locating other ground disturbances on the steep ridge above Ramsey Creek. Although building new roads was not mentioned in the DNS, rebuilding old roads was mentioned, along with the use of skid trails. The standards for assessing and successfully mitigating these impacts should be described. For instance, how much sediment is currently moving through the planned stream crossings, and what will this be post-harvest and post-fire?

Washington Forest Practice standards or better should be adhered to along streams. Minimum setbacks for streams should include retention of most of the intact vegetation cover and healthy trees within 150 feet of perennial fish-bearing streams, and 100 feet from perennial non-fish-bearing streams, and 50 feet from intermittent streams.

Thank you for your consideration.

Sincerely,



George Wooten
Conservation Northwest Associate

Methow Forest Rehabilitation Project - North Methow Road Work

Date: 8/24/2016

Compiled by WDFW Forester Jamie Bass

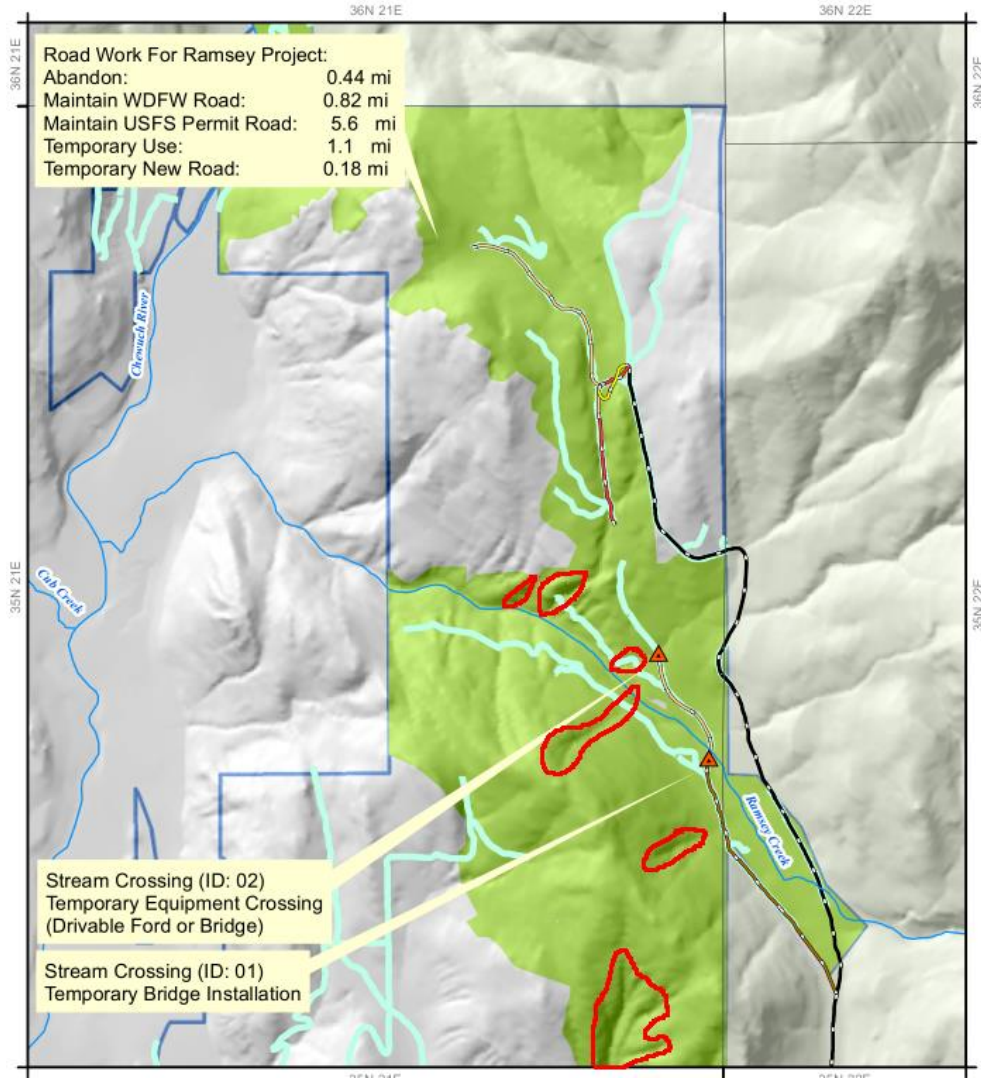
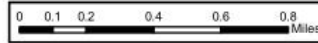


Figure 1. Steep channels that should receive 300-foot setbacks from the sediment delivery zone.