

NORTH CENTRAL WASHINGTON FOREST HEALTH COLLABORATIVE

October 21, 2014

Mike Liu, District Ranger
Methow Valley Ranger District
Okanogan-Wenatchee National Forest
24 West Chewuch Rd.
Winthrop WA 98862

Dear District Ranger Liu,

Thank you for requesting input from the North Central Washington Forest Health Collaborative (NCWFHC) on the Methow Valley Ranger District's proposal to salvage harvest some timber from 250 acres burned by the Carlton Complex Fire. Several members of the NCWFHC's projects workgroup attended your September 2 field trip, and the workgroup has discussed your October 6 scoping notice for the Brimstone Salvage project.

Several issues and concerns were raised during our discussions about the salvage proposal, and no consensus was reached by our committee for a position on this proposal. Some of the workgroup members are disappointed with the small scale of the salvage proposal and believe that at least roadside salvage for safety purposes should be considered for additional categorical exclusion. They are also concerned that utilization standards could require a purchaser to remove trees as small as six inches in diameter that have already lost any commercial value due to blue staining and cracking.

Others in the workgroup are disturbed by the disconnect between the proposed salvage project and the Okanogan-Wenatchee's Forest Restoration Strategy. The original strategy described a focus on desired restoration outcomes and success measured with landscapes that are restored and resilient. The current strategy recognizes the inherent challenge in measuring success in restoration with existing national agency progress metrics in board feet, but states the OWNF is committed to making planning more efficient so that acres treated are the most ecologically important. Some members note the scoping notice identifies no ecological benefit from the project, while stating that the focus is solely on economic recovery. Some members of our committee are concerned with the precedent set by this contradiction; while some are concerned that salvage logging will distract the Forest Service from its focus on large landscape restoration projects like the Mission project.

On the other hand, some workgroup members support the Brimstone project and would like to see the Forest Service move ahead expeditiously. They think that the combination of road decommissioning, road rocking, fuels removal, and timber supply – albeit in small amounts – makes it a worthwhile project.

Moving forward from this proposal, the project workgroup members would like to learn more about when and whether salvage logging would have ecologically restorative effects within a post-fire landscape and how a process consistent with the Restoration Strategy could be integrated. Topics for discussion would include: Does the removal of 1000-hour fuels help to restore more natural fuel loads and fire regimes in a stand? How can we analyze and integrate post-fire stand level prescriptions to

prevent localized re-burn with landscape level impacts to influence future potential fire behavior on the landscape? How do we analyze post-fire proposals for impacts on Restoration Strategy focal species such as black-backed woodpeckers (associated with habitats for <10 years following high severity fire without post fire harvest)? What will determine “if reforestation activities, such as planting and seeding, are necessary” after the commercial salvage activities are completed and how will species selection and spatial variability consistent with restoration goals be integrated into replanting activities?

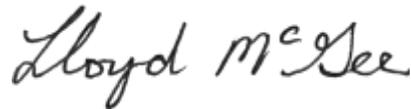
The workgroup remains interested in working with the Forest Service to develop a decision matrix that establishes management guidelines for salvage under a restoration program. Without clear and consistent guidance or rationale, we expect a lack of consensus whenever large fires occur.

Thank you for considering the NCWFHC’s comments. We all agree that important opportunities remain to accomplish restoration work in the original South Summit project area such as we hope to discuss in the development and implementation of South Summit II. We look forward to continued collaboration with you on large-scale restoration projects in the Methow Valley Ranger District.

Sincerely,



Paul Ward, Yakama Nation
NCWFHC Co-Chair



Lloyd McGee, The Nature Conservancy
NCWFHC Co-Chair