



North Central Washington Audubon Society
P.O. Box 2934
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March 20, 2019

Re: Upper Wenatchee Pilot Project #49124

Upper Wenatchee Pilot Project Team,

North Central Washington Audubon Society (NCWAS) is a local chapter of the National Audubon Society with approximately 500 members in Chelan, Douglas, Okanogan, and Ferry counties. The welfare of our region's birds is the primary focus of NCWAS's conservation program. Our program's focus encompasses the protection, enhancement, and/or restoration of our region's native habitat, which birds need to survive and thrive. As a group, birds occupy and utilize the entirety of our lands and waters. Given this, the scope of our conservation work takes an expansive view.

The vision of the Upper Wenatchee Pilot Project (UWPP) seemingly takes a similarly broad view, and the stated goals appear to have the potential for significantly improving habitat conditions for the benefit of fish and wildlife in the greater Lake Wenatchee area. As a result, we are generally supportive of the UWPP and offer the following input to the project's scoping process.

The project's goals of improving conditions of the full mix of important habitats across a broad area appear to be generally in line with policies and actions we typically promote. In particular, we appreciate the breadth of habitats (old growth coniferous, riparian, wetlands, streams, etc.) the UWPP envisions treating. We also support its intent to return the area, as much as possible, to the healthier conditions that prevailed prior to our society's settlement in the area.

Given our general support of the project as mentioned above, we offer the following specific thoughts.

- 1) We fully support the goal of improving forest conditions centered on protecting existing Late Successional Reserves and other coniferous old growth forest stands. We attended the Project Open House near Fish Lake on March 13th and expressed support for significantly increasing old growth conditions on areas currently occupied by second or third growth stands. We also learned that a large part of the planned work will involve forest thinning, which we support, and that some sales will be commercial in nature and some not. We suggest that even commercial sales focus first on leaving as many large trees and snags as possible, with revenue a secondary goal. While this approach may not produce as much revenue, we believe it will most quickly achieve the desired end-result conditions than would otherwise be the case.
- 2) Also mentioned at the Project Open House was the idea that when deciding which large trees in a sale area to remove, particular attention will be given to eliminating dead and diseased ones. We'd like to note that the presence of such specimens is important as they provide a host of essential resources to a wide variety of wildlife. Snags, for example, offer critically needed homes to numerous species of mammals and birds, and

- trees infected with mistletoe are often used as nest sites by Spotted Owls and other wildlife species. For these reasons, we suggest retention of sizeable snags and some large mistletoe containing trees. Within reasonable limits, death and disease should be viewed as natural components of healthy forest ecosystems.
- 3) We understand that the quantity and condition of roads are to be addressed under the plan. We fully support this. In our view, the road network in the area should be considered as a whole, with the goal being to retain and maintain only those roads absolutely necessary to provide the desired level of access. In analyzing the actions to be taken in regard to the road network, we believe that costs and benefits should be broadly considered. For example, some access can have substantial negative effects on habitat and wildlife. Situations where easy access opens critical areas to potential damage from over-use or illegal activities should be avoided. With this concern in mind, we believe the road network should be reduced by targeting for elimination those roads in close proximity to important aquatic systems, meadows, and other critical habitats. In addition to outright removal, we suggest consideration also be given to determining opportunities for roads-to-trails solutions.
 - 4) If the project's goals for fish and wildlife are to be fully realized, we believe the UWPP should include maximum protection and restoration efforts for critical habitats as one of its centerpieces. While achieving greater fire resilience and the promotion of healthy natural habitats hosting a full set of native biodiversity across the landscape are good overarching goals, paying special attention to uncommon, but particularly critical, habitats will enhance the project's eventual results.

We appreciate the opportunity to offer comments at this early stage of this important project and look forward to providing further input as it develops. Please feel free to contact us any time if you have questions or we can be of assistance.

Sincerely,



Arthur Campbell
President, North Central Washington Audubon Society