



Confederated Tribes and Bands
of the Yakama Nation

Established by the
Treaty of June 9, 1855

October 17, 2023

Okanogan-Wenatchee National Forest
Wenatchee River Ranger District
c/o Justin Gelb
600 Sherbourne Street
Leavenworth, WA 98826

Submitted via USFS Electronic Portal –
<https://cara.fs2c.usda.gov/Public/CommentInput?Project=64247>

Dear Mr. Gelb,

Thank you for the opportunity to comment on the Chumstick to Lower Peshastin (LP) project. We are generally supportive of the overall purpose of this project to: 1) reduce elevated risks of wildfire to communities who reside within the wildland-urban interface, while increasing opportunities for effective fire suppression across the project area; 2) restore forest structure and composition to more sustainable conditions, and 3) reduce the risk of large-scale habitat loss from severe wildfires.

We understand that the District was directed to use the Western Firesheds Emergency Action Declaration (EAD), which limits the proposed action and does not include a provision for aquatic analysis; however, we do not agree that the use of the EAD entitles the US Forest Service (USFS) to forgo aquatic analysis altogether. Provision should be made for an aquatic assessment, similar to those done for the Upper Wenatchee Pilot and Twisp Restoration Project, on the subject landscape, through a separate but concurrent or nearly concurrent action and NEPA process.

We suggest the USFS conduct an aquatic analysis using a streamlined version of what was done for the Upper Wenatchee Pilot, in order to inform an action under the Pacific Northwest Region Aquatic Restoration Project Environmental Assessment. If staff time is not available for that analysis, the USFS has several partners, foremost of whom are the Yakama Nation, available to assist with completing that work. Our current understanding of the Central Washington Initiative leads us to believe that funds from that effort could be used for the analysis and subsequent restoration work.

Please contact Brandon Rogers at (509) 949-4109 or rogb@yakamafish-nsn.gov with any questions about these comments.

Sincerely,



Philip Rigdon, Superintendent
Yakama Nation Department of Natural Resources

cc: Shannon Adams
David Blodgett
Brandon Rogers