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TO: Scott Robinson, District Ranger, Okanogan-Wenatchee National Forest, Cle Elum Ranger District, 803 W. 2nd Street, Cle Elum, WA 98922

RE: Comments on the Draft Environmental Assessment (EA) for the Upper Swauk Restoration Project

GENERAL COMMENTS

According to the Cle Elum Ranger District's cover letter dated August 21, 2025:

The Cle Elum Ranger District has prepared a draft environmental assessment (EA) for the Upper Swauk Restoration Project, and it is now available for a 15-day comment period. The 36,567-acre project area is located on the Cle Elum Ranger District, thirteen miles northeast of Cle Elum, WA near Liberty, WA within Kittitas County. The project proposes forest restoration activities including commercial and non-commercial thinning, fuel break creation, and prescribed fire application to improve wildfire resiliency and forest health. The project also incorporates aquatic restoration actions aimed at improving overall watershed health; these activities include culvert replacement, large wood placement, and road relocation out of the floodplain. A variety of transportation system changes are also planned, including but not limited to, closing or decommissioning system and non-system roads, road to trail conversions, and new temporary road construction to facilitate harvest activities.

A 15-day comment period is unacceptable and does not provide sufficient time to properly prepare specific comments on a 36,567-acre project area. This should be clearly apparent to the Forest Service as it obviously took longer than 15 days to prepare the EA. The comment deadline should be extended.

In addition, the cover letter also states that the Forest Service has prepared a preliminary finding of no significant impact (FONSI) document (EA, page 75-84). This is "disturbing" as the activities proposed for this 36,567-acre area would have significant adverse

environmental impacts. However, the EA contains no section on “mitigation conditions” or “monitoring. Conditions are only listed in Appendix E under Water Quality 4, 19, and 22 (pp. 126, 129, and 130).

The entire EA is inadequate as it lacks a specific monitoring program that the public can review in advance. In addition, monitoring of Forest projects is a requirement of the Northwest Forest Plan (NWFP), in which the Standards & Guidelines specify:

Monitoring is an essential component of natural resource management because it provides information on the relative success of management strategies. The implementation of these standards and guidelines will be monitored to ensure that management actions are meeting the objectives of the prescribed standards and guidelines, and that they comply with laws and management policy. Monitoring will provide information to determine if the standards and guidelines are being followed (implementation monitoring), verify if they are achieving the desired results (effectiveness monitoring), and determine if underlying assumptions are sound (validation monitoring). (NWFP, S&G p E-1)

Impact monitoring, followed by appropriate corrective measures, is an appropriate type of NEPA and Forest Service mitigation. The proper remedy is to monitor the operation and to halt operations in the event of noncompliance. See: *Forest Service Manual 2000 - National Forest Resource Management, Chapter 2040 - National Forest System Monitoring*. Without monitoring or reporting requirements, the public has no confidence that the Forest Service would monitor or report any significant adverse environmental impacts from the proposed project.

A monitoring plan should be included that clearly describes in the EA how monitoring will take place, what will be measured and tracked, and how the Forest Service will apply adaptive management to study the cumulative impacts of the project. This would describe when, why, and how the Forest Service will make changes to future phases of the project as a result of such monitoring.

The issuance of a DNS and FONSI is unacceptable. The public would be better served by the preparation of a draft environmental impact statement. At the very least, a mitigated DNS should be prepared, detailing specifically the monitoring and conditions needed (as addressed below) to ensure that significant adverse environmental impacts do not occur. In addition, a condition should be attached ensuring that the public has the right to present information to the Forest Service demonstrating that impacts from the Upper Swauk Restoration Project are greater than forecast by the EA.

More specific comments are as follows:

Page 1 states:

As a cooperating agency for development of this EA, the Bonneville Power Administration (BPA) is considering whether to provide funding to support certain aquatic and wildlife habitat restoration activities within the Upper Swauk Restoration project area.

Comment: A summary of proposed actions is found in Table 6, page 15.

- What is the estimated total funding that BPA is expected to provide for aquatic and wildlife restoration activities?
- Where would these “actions” take place?

Page 3 states that “There is a need to restore the composition and structure of forest vegetation altered by past vegetation management and long-term fire suppression to reduce the risk of large-scale high severity wildfire.”

Comment: The EA lacks a robust analysis of the impacts of “large-scale high severity wildfire.” As this is one of the main drivers of this proposal, it is incumbent on the Forest Service to present its case that wildfire is detrimental to the forest ecosystem. Over the past decades there have been sufficient wildfires in the Wenatchee National Forest to determine the aftereffects of wildfires. Will the Forest Service prepare this analysis?

Page 8 states:

This EA tiers to the Wenatchee National Forest Land and Resource Management Plan Final Environmental Impact Statement and Record of Decision (USDA Forest Service 1990b, 1990c), and incorporates by reference the accompanying Land and Resource Management Plan (Wenatchee Forest Plan) (USDA Forest Service 1990a), as amended by the Northwest Forest Plan (NWFP).

Comment: The fact that the most current Wenatchee National Forest Land and Resource Management Plan is a quarter century old is another obvious reason why an EIS should be prepared for this project. What accounts for the fact that the WNF Land and Resource Management Plan, other than the Northwest Forest Plan, has not been updated for the last 25 years?

Page 12. Table 5. Planning Guidance

This table and other sections of the EA use the term “vegetation management.”

Comment: On February 15, 1990, Donald F. Rotell, District Ranger, Naches Ranger District, Wenatchee National Forest, issued a solicitation letter for public input “concerning the Timber Stand Improvement program for Fiscal Year 1991.” (Ref: 2410/2470). This letter stated:

This program consists of activities/treatments in unmanaged timber stands and previously harvested areas where the average tree is less than 7 inches in diameter. Excess trees, diseased and damaged trees are removed in order to concentrate growth on the faster growing, healthier trees. *This compares to the common practice of thinning carrots in a vegetable garden.*

This at least is an open and honest admission of how the Okanogan Wenatchee National Forest (OWNF) views forest management. Therefore, please include the following in your final documents:

- “Vegetation management” compares to the common practice of thinning carrots in a vegetable garden.

In addition, the EA contains 150 references to “thinning,” but only eight references to “logging.” Again, the attempt by the Forest Service to hide behind terms such as “thinning” or “vegetative management” is unacceptable. The removal of trees from our public National Forests is called “logging.” Please use the correct term.

Page 14 states:

In addition to the 30-day comment period on the NOPA, the District engaged with the public and interested organizations at several points during project development, particularly early in project development. These public engagements included:

- A project kickoff meeting in March 2022 with stakeholder attendance including several organizations, representatives from several Washington State agencies, and tribal representatives.
- Three additional meetings were held with the collaborative group, sharing initial project information in April and June 2022 and presenting the NOPA in November 2023
- Three field visits were held to discuss the project and potential proposed actions in July, August, and October 2022.

Comment: Presumably, the purpose of National Forest public “engagements” is for the National Forest decision maker to hear directly from the public on the Notice of Proposed Action. Scott Robinson, District Ranger is listed on page 1 as the responsible official for the EA. Please list whether District Ranger Robinson attended the four meetings and three field visits listed above.

Page 16 states the Upper Swauk Restoration Project proposes to implement a landscape prescription “to move the landscape towards a more resilient condition.”

Comment: The Wenatchee National Forest has embarked on multiple “restoration projects” in the past. Please describe and quantify the success of past such projects.

Page 16 also states:

Historically, ecological interactions in forests (e.g., disturbance, most commonly fire) produced stand patterns that consisted of individual trees, clumps of trees, openings, and, in localized areas, complex patches with more structural and species diversity.

Comment: For purposes of understanding base-line conditions, please include a map showing what the historical conditions of the Upper Swauk would have looked like.

Page 17 states:

Thinning and planting methods include:

- Low thinning to remove suppressed, intermediate, and co-dominant trees.

Comment: The EA fails to include a definition of terms. Please clarify that co-dominant trees are those with multiple stems.

Page 18 states:

Treatments in Riparian Reserves

Most commercial and non-commercial thinning stands have RRs present within the boundary.

Comment: How many acres of Riparian Reserves would be subject to subject to “thinning”?

Page 21 states:

Shaded Fuel Breaks – 4,377 acres

Shaded fuel breaks would be established using commercial and non-commercial thinning in designated areas to modify and manage for wildfire, assist fire suppression in strategic locations, and act as control features for prescribed fire (Figure 7). To create the fuel breaks, thinning of trees of any size class may occur; however, the focus will be on thinning small and medium-sized trees <20” DBH.

Comment: What is the estimate of the number of trees >20’DBH that would be removed in shaded fuel breaks?

Page 29 states:

In 2023, a second Travel Analysis was conducted to analyze an additional 800 unauthorized roads that were found utilizing lidar. The unauthorized roads total 156 miles on the landscape. Approximately 75 miles of these roads were identified for action as part of this project, including adding approximately 25.5 miles to the official road system, converting approximately 3.3 miles to trail, and decommissioning approximately 43

miles. These miles are included in the tally of proposed miles after project implementation in Table 9. The miles of unauthorized roads not proposed for action were those with poorly defined road prisms that would naturally decommission over time, were not causing resource concerns, and would cause more disturbance to take action on to decommission.

Comment: Eight hundred unauthorized roads totally 156 miles is a shockingly high number for this small 36,567-acre project area within the Wenatchee National Forest. What accounts for this high number? How and by whom were these unauthorized roads constructed? Why are 25.5 miles being added to the “official road system.” What would be the cost of adding and maintaining these 25.5 miles of unauthorized roads?

Page 30 states:

Rock Pit Access

Rock pits provide a local source of aggregate for road maintenance projects supporting haul route development for timber sales and annual upkeep of system roads and recreation infrastructure. Some rock pits already have stockpiled materials from previous project staging, but other rock pit sources have not been developed. This project is an opportunity to designate rock pits and access to them. Primary products from rock pits include crushed aggregate, riprap, pit run, or borrow. On-site crushing/processing of rock is also proposed to support local road maintenance projects.

Comment: Where are the existing rock pits located? Please describe the noise and dust impacts from on-site crushing/processing of rock. Are any of the existing rock pits or proposed rock pits within a riparian zone?

Page 32 states:

Abundance of Large and Mature/Old Trees: Large and mature/old tree abundance in old forest types within the project area is at the low end of reference conditions.

Comment: What methodology did the Forest Service use to map mature and ancient forests at fine spatial scales?

Page 41 states that “The proposed action would create 4,377 acres of fuel breaks.”

Comment: “Fuel breaks” is a vague term in the EA. Please identify all existing fuel breaks in the project area. Please describe how the existing fuel breaks have functioned in reducing the spread of wildfires in the project area and in the Wenatchee National Forest. Please describe the Forest Service rules and policies for bulldozing new linear fuel breaks while carrying out fire suppression activities.

Please re-evaluate and analyze how removal of trees for “fuel breaks” allows more flammable grasses and other low vegetation to grow, therefore increasing the likelihood of wildfires, especially near roads.

In addition, the entire EA is inadequate as it fails to present and review a significant number of studies and reports questioning the utility of “fuel reduction” logging. Attached is a John Muir Project 2024 fact sheet on “Fuel Reduction” Logging Increases Wildfire Intensity.” A review of this fact sheet shows that the Forest Service has not included ANY of the voluminous studies cited by the John Muir Project in Appendix H- References (EA pages 151+). In fact, where the Forest Service Appendix H references do cite researchers also listed in the John Muir Project, the Forest Service has chosen not to list other studies by these same researchers that do not fit the Forest Service’s narrative. For example, Appendix H references Damon B. Lesmeister studies, but not the 2019 study listed by the John Muir Project: Lesmeister, D.B., et al. (**co-authored by U.S. Forest Service**) 2019. Mixed-severity wildfire and habitat of an old-forest obligatory. Ecosphere10: Article e02696.

Therefore, the Forest Service must withdraw this EA until it has properly reviewed the studies and reports cited in the John Muir Project fact sheet.

Page 42 Northern Spotted Owl.

Comment: Would the proposed project be advantageous to barred owls?

Page 52 states: “Treatments would retain the mature forest component of the area and promote the desired growth of large trees.”

Comment: It is well known that mature/ancient forest trees and stands are quite fire resistant, and there is no need to cut them. Will the Forest Service refrain from cutting, whether commercial or non-commercial, any mature/ancient forests or stands with mature/ancient forest stands, even for understory fuel management?

Page 53 on Fisheries includes Table 24 that lists the existing conditions for habitat indicators in the project area. Pages 55+ sets out the Environmental Consequences of the Proposed Action on Fisheries.

Page 58 states:

Cumulative effects

Considering past, present, and reasonably foreseeable actions, MCR steelhead, redband/rainbow trout, and westslope cutthroat trout are exposed to some cumulative increased risk in Swauk Creek and its tributaries in the Upper Swauk sub watershed for the foreseeable future. Specifically, increased sediment because of road management actions associated with vegetation management, and from existing and continued elevated sediment background effects primarily from high road densities in proximity to stream channels.

Effects to ESA Listed Fish Species: Overall, the project contains project elements which all have potential to directly affect individuals or occupied/critical habitat through a short-term, minor increased risk of sediment delivery. The expected direct effects to individuals include altered behavior or minor, short-term physiological effects from increased site turbidity. Expected direct effects to habitat include minor, temporary reduction of spawning habitat viability at a site/sub-drainage scale. Overall, the project proposes a suite of actions that, once completed, would result in a meaningful restoration or habitat connectivity and watershed and habitat forming processes that would move the Upper Swauk Sub-watershed towards more natural function, however these short-term, potentially adverse effects cannot be discounted, see table 27.

Comment: What specific mitigation, monitoring, and reporting steps does OWNF intend to take to address the identified increase impact of sediment on water quality and fisheries?

The proposed project would take place within the Upper Swauk Creek watershed. (page 2, Figure 1 – Project Vicinity Map). Swauk Creek, in turn, flows south to the Yakima River southeast of Ellensburg. As an upper watershed tributary of the Yakima River, it has a significant part to play in the maintenance of water quality (from sedimentation) and water quantity (by retaining as much snow cover as possible). Page 66 states:

Within the project area, neutral to adverse effects from the proposed actions are expected to be short-term (2-10 years). Localized erosion and sedimentation would occur from road maintenance, road closure and decommissioning, in-stream wood placement, replacement or removal of road-stream crossings, silvicultural and fuel reduction treatments in outer RR, and upslope commercial and noncommercial treatments that decrease canopy cover and increase bare soil. Commercial thinning, non-commercial thinning, prescribed fire, and access management would temporarily increase runoff and sediment supply.

However, the EA fails to provide any quantitative information concerning either the amount of increased sedimentation from certain project measures, or the amount of decreased sedimentation from. Please provide these estimates.

Downstream irrigation districts have over-appropriate water in the Yakima River Basin and together with Bureau of Reclamation dams and irrigation district divisions have had a devastating negative impact on what was once a productive and prosperous number of runs of wild salmon, as well as freshwater fish. It is therefore imperative that the OWNF strive to retain as much snowpack as possible. Therefore, please provide an analysis for each of the proposed project measures as to whether they would increase or decrease snowpack and whether they would increase or decrease water quantity runoff.

As reported in the New York Times, for decades, the dry season in the Amazon rainforest has been getting drier. A new study, published in *Nature Communications*, found that about 75% of the decrease in rainfall is directly linked to deforestation. In addition, the study also found that tree loss was partly responsible for increased heat across the Amazon. According to the study, since 1985, the hottest days in the Amazon have warmed by about 3.6 degrees Fahrenheit. About 16% of that increase, the researchers found, was because of deforestation. Amazon trees pull water from the soil and, through a process known as transpiration, release that moisture through tiny pores on their leaves. There are hundreds of billions of trees in the Amazon Basin, and the water they collectively release into the air is estimated to contribute more than 40% of all the region's rainfall.

<https://www.seattletimes.com/nation-world/scientists-may-have-identified-a-culprit-behind-declining-amazon-rains/>

Please explain how the Forest Service has taken into account its management and logging on the OWNF and the proposed project area in terms of deforestation and this contribution to drought in the Yakima River Basin.

In addition, although the OWNF has been a member of the Yakima River Basin Plan Workgroup, since December of 2023, the OWNF has only attended one (Sept. 11, 2024) of the subsequent five quarterly meetings of the Workgroup. This is extremely disappointing. As a Workgroup member, the OWNF has a responsibility to promote the importance of maintaining forest conditions that enhance environmental conditions in the upper Yakima watershed. A copy of a recent report on problems and concerns with the Washington Department of Ecology's Office of Columbia River, including the Yakima Plan, is attached. Also, the OWNF should continue its opposition to uneconomical and environmentally damaging new irrigation dams and water projects, such as a new Bumping Lake Dam, as set out in the Yakima Plan. We appreciate the 2009 OWNF letter to the Washington Department of Ecology stating:

On balance, we believe the proposed increase in water storage capacity at Bumping Lake has more negative effects on the resource and uses of National Forest System lands than benefits.

http://ucrsierraclub.org/pdf/Yakima_USFS_Bumping_2009-11.pdf

Page 60 states: "Analysis of the landslides within the project area revealed predominantly dormant landslides with a small percent of these classified as activated or recent (3%)."

Comment: The following is a link to a 2022 Central Washington University field trip documenting mass wasting events in the Upper Swauk Watershed. How did the presence of mass wasting inform the Forest Service's decisionmaking regarding the proposed project?

https://www.cwu.edu/academics/geography/_documents/swauk-watershed-field-trip.pdf

Page 76. Cultural impacts

Comment: How has the OWNF inventoried cultural features, such as “culturally modified trees”? Have these been found within the proposed project area?

<https://www.seattletimes.com/seattle-news/environment/the-pacific-northwest-trees-shaped-by-generations-of-people/>

Page 89, Table 44. The entire EA makes only two mentions of herbicide use:

Invasive plant sites will be treated consistent with the 2005 Region 6 Invasive Plant FEIS and ROD amending the Wenatchee Forest Plan. The 2017 OWNF Invasive Plant Treatment Project FEIS and ROD included additional herbicides as well as Early Detection Rapid Response methods for treatment, including limited programmatic herbicide use in riparian buffers.

These activities are previously authorized by the above decisions and therefor are considered reasonably foreseeable activities rather than direct proposals of this project.

and pages 130-131:

Invasive plant sites will be treated consistent with the 2005 Region 6 Invasive Plant FEIS and ROD amending the Wenatchee Forest Plan. The 2017 OWNF Invasive Plant Treatment Project FEIS and ROD included additional herbicides as well as Early Detection Rapid Response methods for treatment, including limited programmatic herbicide use in riparian buffers.

Comments: The 2005 FEIS and ROD are twenty years old and the 2017 FEIS and ROD are nearly a decade old. Reliance on such old documentation is not acceptable and should be updated. The EA fails to make even a single reference to specific herbicides or the acreage of application that would take place under this proposed action. Please clarify why Table 44 (page 89) has “0” acres listed for invasive species management, while still relying on other documents listed in this table? In order to provide a proper assessment of the probable significant adverse impacts from the proposed project, the Forest Service needs to include an analysis of invasive plant treatment, as well as alternatives to herbicide use. Such an analysis appears to be required to ensure consistency with the objectives of the Aquatic Conservation Strategy of the NWFP.

Please send me a copy of any further decision on the proposed EA and FONSI. Thank you.

Attachment: “Fuel Reduction” Logging Increases Wildfire Intensity.” John Muir Project

Attachment: “Dept. of Ecology/Office of Columbia River 2017-2024”