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WISE USE MOVEMENT

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April 14, 2026

TO: Erica Taecker
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Okanogan-Wenatchee National Forest
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Leavenworth, WA 98826
<https://cara.fs2c.usda.gov/Public/CommentInput?project=68983>

**RE: Okanogan-Wenatchee Nation Forest (O-WNF) Eagle Creek Restoration Project
Draft Environmental Assessment (#68983)**

The following are the comments of the Wise Use Movement on the Eagle Creek Restoration Project Draft Environmental Assessment (DEA) (#68983).

GENERAL COMMENTS

The Wise Use Movement finds that the DEA fails to include relevant information from the proposed Chumstick to Lower Peshastin Project. According to the DEA (page 1), the 5,130-acre Eagle Creek project area was originally part of the larger Chumstick to Lower Peshastin Project EA landscape, which was scoped to the public in September 2023. Due to wildfire impacts in that project area in 2025, the Chumstick to Lower Peshastin EA was put on hold and this project area, which was not impacted by wildfire, has been moved forward as a standalone DEA and Findings of No Significant Impacts (FONSI).

The proposed Chumstick to Lower Peshastin Project covered 115,333 total acres with proposed “treatment” of 36,500 to 53,000 acres. The DEA should incorporate and disclose data and lessons learned from wildfire impacts in 2025. Most wildfires leave a mosaic pattern of badly burned, moderately burned, and even non-burned areas.

- How many acres in this project area were previously logged?
- What were the wildfire impacts in the Chumstick to Lower Peshastin Project area?

- How many miles of fire breaks were constructed in this area?

The Wise Use Movement finds that the DEA fails to comply with the National Environmental Policy Act and should be withdrawn. According to the Eagle Creek EA Determination letter (March 30, 2025):

The Eagle Creek Project was authorized to use the Secretary of Agriculture’s Memorandum 1078-006 emergency situation determination (ESD) under section 40807 of the Infrastructure Investment and Jobs Act (IIJA) on February 6, 2026. Under this emergency authority, the Eagle Creek Project EA was developed to consider only a proposed action and no action alternatives in detail, and the EA will not be subject to pre-decisional administrative review (Consolidated Appropriations Act of 2012 (Pub. L. 112-74) as implemented by Subparts A and B of 36 CFR part 218). Because the project will not be subject to the pre-decisional administrative review process, this will be the last opportunity for public comment before a decision is authorized for this project.

Please document how the USFS considers this to be an “emergency situation” warranting the disregarding of the National Environmental Policy Act (NEPA) scoping process and other NEPA requirements.

NEPA requires that:

consistent with the provisions of this chapter. . . , include in every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment, a detailed statement by the responsible official on –

(iii) a reasonable range of alternatives to the proposed agency action, including an analysis of any negative environmental impacts of not implementing the proposed agency action in the case of a no action alternative, that are technically and economically feasible, and meet the purpose and need of the proposal; (42 U.S.C. §4332(C). [emphasis added]

In addition, as posted on the current USFS website under *Forest Service NEPA Procedures and Guidance*:

11. Consider the alternatives analyzed in environmental document(s) before rendering a decision on the proposal (36 CFR 220.4(c)) [emphasis added]
<https://www.fs.usda.gov/about-agency/regulations-policies/nepa/nepa-procedures-and-guidance>

Rather than complying with NEPA, the O-WNF has failed to include a range of alternatives (other than a no-action alternative) in the DEA. In essence the O-WNF has presented a single proposal, a take-it or leave-it project that fails to offer decisionmakers or the public any choices on a proposal covering over 5,000 acres within the O-WNF. In fact, this proposal would set a precedent for chopping up the O-WNF into smaller areas, all based

on an “emergency” using abbreviated review processes with limited public comment and without any cumulative impacts analysis. Because the O-WNR has failed to comply with NEPA, this DEA should be withdrawn until a DEA with a reasonable range of alternatives is provided.

The Wise Use Movement finds that the proposed commercial and non-commercial tree thinning, biomass removal, prescribed burning, and pile burning would significantly affect the quality of the human environment. Therefore, after a revised DEA is issued that complies with NEPA, a draft Environmental Impact Statement must be prepared.

The Wise Use Movement finds that a 16-day public comment period is unacceptable and does not provide sufficient time to properly prepare comments on the proposed project area. This should be clearly apparent to the O-WNF as it obviously took longer than 16 days to prepare the DEA. The comment deadline should be extended.

More specific comments are as follows:

The Wise Use Movement finds the DEA deceptive in its description of the proposed project. The DEA includes both commercial and non-commercial tree thinning. DEA page 3. A USDA Forest Service webpage describes “thinning” as:

By now many wildland conservationists know that fire can be good for forests and grasslands. In fact, in previous decades, when the rule was to remove all fire from the landscape, massive amounts of fuel, in the form of small trees, shrubs and grasses, have built up in our more than 700 million acres of forests.

This is why the process of mechanical thinning is so crucial to forest health. It is in part the thinning of dense stands of trees that make wildlands better able to withstand fire.

Mechanical thinning of forests is a multifaceted process and often involves piling brush, pruning branches and creating fuel breaks.

<https://www.fs.usda.gov/about-agency/features/thinning-forest-trees>

Nowhere in this description is “commercial” logging mentioned. Yet, the O-WNF DEA states:

The proposed action involves the commercial harvest of 928 acres of Young Forest Multi-Story and 35 acres of Stem Exclusion Closed Canopy stands within the project area, trees to be cut are generally less than 25 inches DBH (diameter at breast height). *DEA page 5.*

- Why is the O-WNF including **commercial** logging under the guise of “thinning”?
- The O-WNF must include an alternative that would propose only **non-commercial** removal of small trees, shrubs and grasses.

- In addition, the entire DEA 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.”

The Wise Use Movement objects to the use of the term “vegetation treatment,” as used in the DEA, page 4: “The following design criteria would apply to all proposed **vegetation treatments**, informed by Identifying Old Trees and Forest by Robert Van Pelt (2008) and The ICO (individuals clumps, and openings) Approach to Quantifying and Restoring Forest Spatial Pattern: Implementation Guide (Churchill et al. 2016).” This includes:

Openings in forest stands of up to 3 acres would be created in treatment areas. Table 6.”

- The O-WNF should provide some context for such statements. For example, one acre is approximately the size of a football field without the endzones. Imagine THREE football fields to convey the size of the proposed “openings.”

The Wise Use Movement finds that the DEA is fundamentally dishonest as it uses the euphemism of “thinning.” The term “logging” only appears 16 times (not including the Appendixes), and nowhere in the FONSI, while the DEA uses the term “thinning” 82 times (not including the Appendixes). Especially, when the DEA states, “**The proposed thinning directly supports timber production and wood products.**” (DEA, page 44).

Apparently, little has changed since February 15, 1990, when 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.* [emphasis added]

This at least is an open and honest admission of how the U.S. Forest Service views forest management.

- Why does the O-WNF insist on using the term “thinning” and avoid using the term “logging.”
- Please use the term “logging” instead of “thinning” in future DEA documents.
- Please include the following in your final documents:

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

The Wise Use Movement finds that the preliminary findings of no significant impact (FONSI) (DEA, page 44) are incorrect. This is “disturbing” as the activities proposed for the O-WNF would have significant adverse environmental impacts.

- The O-WNF must issue a Finding of Significance (FOS).

The Wise Use Movement finds that the DEA fails to adequately address cumulative impacts, The DEA makes only three brief mentions of cumulative impacts (DEA pp. 34, 36, 37). As noted above, it appears that the O-WNF intends to segment proposed logging projects on the O-WNF under an “emergency” order by issuing inadequate DEA’s with barely two weeks of public comment across the entire O-WNF.

- A DEA must address cumulative impacts of similar logging projects across the entire O-WNF in a systematic and quantitative presentation.
- Would the proposed project be advantageous to barred owls?

The Wise Use Movement finds that the entire DEA is inadequate as it lacks a specific monitoring program that the public can review in advance. The DEA contains no specific sections on “monitoring” or “mitigation conditions” other than mitigation measures in Appendix B. Monitoring of Forest Service 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).

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*. However, without monitoring or reporting requirements to the public, 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 adaptative management to study the cumulative impacts of the project, and how this information would be provided to public. 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, as well as opportunities for public review and comments.

- Concerning mitigation measures listed in Appendix B, a revised DEA should detail how the O-WNF will monitor and enforce mitigation measures, and how this information would be provided to public.

The Wise Use Movement finds that the DEA fails to disclose ANY public meetings or hearings that were held during the development of the DEA.

- Please document all public meetings or hearings that have been held on this project.
- Provide a listing of public comments and how they were addressed.”

The Wise Use Movement finds that the DEA fails to provide historical information.

- The O-WNF should describe and quantify the success of any of its past “Landscape Analysis,” “Vegetation Management,” and “Vegetation Projects” or provide a comparison to other proposed projects such as the 36,567-acre Upper Swauk Restoration project Environmental Assessment.

SUMMARY

In conclusion, the Wise Use Movement finds the DEA is inadequate and should be withdrawn and that the O-WNF should abandon its efforts to commercial thin this project area, without the preparation of an EIS.

Please provide a copy of any decision made on the DEA. Thank you.

/s/ G.M. Zemansky, Ph.D., PG Emeritus, CGWP
President
Wise Use Movement

Attachment: “Fuel Reduction” Logging Increases Wildfire Intensity