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October 2, 2026

Holly Krake
Chelan Ranger District, Okanogan-Wenatchee National Forest
428 W Woodin Avenue
Chelan, WA 98816

Dear Ms. Krake and Lower North Shore Project Team,

BlueRibbon Coalition (BRC) is writing to provide feedback for the Lower North Shore Landscape Restoration Draft Environmental Assessment (EA) and Preliminary Finding of No Significant Impact (FONSI). BRC is a national non-profit organization that champions responsible recreation and encourages a strong conservation ethic and individual stewardship. We champion responsible use of public lands and waters for the benefit of all recreationists by educating and empowering our members to secure, protect, and expand shared outdoor recreation access and use by working collaboratively with natural resource managers and other recreationists. Our members use motorized and non-motorized means of recreation, including OHVs, horses, mountain bikes, and hiking to enjoy federally managed lands throughout the United States, including those of the USDA Forest Service. Many of our members and supporters live in Washington or travel to Washington and use motorized vehicles to access Forest Service managed lands, including the Okanogan-Wenatchee National Forest. BRC members visit these areas for motorized recreation, sightseeing, photography, hunting, wildlife and nature study, camping, water sports, and other similar pursuits. We would like to add our support to any comment submitted by any other individuals or organizations that advocate for active forest management and increased recreation access overall. BRC members and supporters have concrete, definite, and immediate plans to continue such activities in the future.

The Lower North Shore Landscape Restoration Project would treat 30,167.6 acres of National Forest System lands on the Chelan Ranger District, north of Lake Chelan, over a 20-year implementation period. Treatments include non-commercial thinning, piling and pile burning, prescribed broadcast burning, and post-wildfire reforestation where natural regeneration is unlikely.¹ BRC supports treatment and active management of these forests and supports the Proposed Action. The comments below explain that support and ask the Forest Service to carry the EA's statement that the project makes no changes to public motorized access into the decision, and to keep temporary closures, firelines, and temporary roads from becoming a permanent loss of access.

Summary of BRC's Positions

- BRC supports the Proposed Action, including the combination of thinning followed by prescribed fire, the use of prescribed fire on the full 30,167.6-acre project area, and the 20-year window for follow-up and maintenance treatments.
- BRC supports the EA's statement that "[t]he project does not propose any changes to public motorized access in the project area" and asks that the decision document repeat it as a commitment.²
- BRC asks that recreation closures be limited in size and duration, scheduled to avoid peak use where practicable, announced in advance, and lifted as soon as safety allows, and that these requirements be written into the project design criteria.
- BRC asks that firelines follow existing roads and trails wherever possible, that no existing system road, motorized trail, or user-established route be decommissioned as a byproduct of fireline or temporary-road work, and that new firelines be rehabilitated so they do not become unauthorized routes.
- BRC asks the Forest Service to disclose the temporary road mileage that the EA's heading anticipates, and to clarify how the project's emergency authority and the objection process apply to the portion of the project area outside the emergency determination.

Support for Treatment and Active Management

The EA describes a landscape where frequent, low-severity fire historically maintained open stands of fire-tolerant species such as ponderosa pine, and where fire has been absent or

¹ USDA Forest Service, Lower North Shore Landscape Restoration Draft Environmental Assessment and Preliminary Finding of No Significant Impact, Proposal No. 413577 (Sept. 2026) (EA/FONSI) at 6 (Table 1), 8 (Table 2). Page citations in this letter are to the PDF page numbers of the combined document, because the printed page numbers restart partway through it.

² EA/FONSI at 9.

interrupted long enough that fuels and stand density have departed from those conditions.³ The Forest Service identifies fire risk as "high to very high" in the central and northern portions of the area and on private property with homes on both sides of Lake Chelan.⁴ Fire modeling without treatment shows surface fire on 49 percent of the area and passive or active crown fire on 39 percent. Of the nearly 50 percent of the area dominated by surface fire, only 7 percent is modeled at flame lengths under four feet, the length that hand crews can effectively and safely suppress.⁵

The Proposed Action changes those outcomes. The EA models a reduction in active crown fire from 7 percent to 1 percent of the area, a 30 percent decrease in passive crown fire, and a 33 percent increase in the share of the area with flame lengths of 0 to 4 feet, which are amenable to direct attack. That change would raise the portion of the area in that class to 42 percent.⁶ The EA also finds that the no-action alternative would have adverse, long-term, moderate to major effects on crown fire activity and on flame lengths, and would bring cascading effects on air quality, wildlife habitat, and public health.⁷ BRC agrees with that comparison. A prescribed burn closes a trail or road temporarily. A large, severe wildfire can close it for far longer, and the EA recognizes that catastrophic wildfire would cause "large-scale loss of scenic and recreation values and higher suppression expenditures."⁸ Treatment is the better outcome for recreationists.

BRC supports the project's focus on non-commercial thinning of trees under 11 inches in diameter on approximately 21,095.9 acres, the retention of the largest and healthiest trees, and the use of prescribed fire alone on the 9,071.7 acres that are too steep or remote for initial thinning.⁹ The design limit of equipment use to slopes of 35 percent or less, with hand work up to 60 percent slope, is a reasonable way to limit soil impacts while still reaching the acres that need treatment.¹⁰ We also support the sequencing of mechanical thinning ahead of fire, which the EA supports with current research.¹¹

³ EA/FONSI at 3 (Introduction).

⁴ EA/FONSI at 4 (Need 1, Objective 1).

⁵ EA/FONSI at 24 (Fire and Fuels, Potentially Affected Environment).

⁶ EA/FONSI at 24 (Fire and Fuels, Environmental Consequences).

⁷ EA/FONSI at 9-10 (No-action Alternative).

⁸ EA/FONSI at 23 (No-action Alternative).

⁹ EA/FONSI at 6 (Table 1 and Non-commercial Thinning).

¹⁰ EA/FONSI at 7.

¹¹ EA/FONSI at 3 (citing Skinner 2005; Schwilk et al. 2009; Kalies and Kent 2016; Prichard et al. 2020; Vernon et al. 2023).

BRC supports the 20-year implementation window and the EA's recognition that follow-up thinning and follow-up prescribed fire will be needed to maintain fire return intervals.¹² Fuel treatments that are not maintained lose their value. The decision document should state expressly that maintenance entries within the 20-year window are authorized by this decision, so the agency does not need a new analysis each time a unit comes due. We also support the project's coordination with the Cooper Ridge fuel break, for which this project supplies the prescribed fire component, and with the earlier Antilon to Alta restoration project, whose treated areas this project will maintain.¹³

The project also benefits the wildlife that BRC's hunting and wildlife-viewing members value. The EA finds that habitat for dry-forest, large-tree, open-canopy species such as the white-headed woodpecker is under-represented relative to reference conditions, and that treatments would help maintain and recruit mule deer cover by reducing the chance that it is lost to high-severity fire.¹⁴ The Endangered Species Act consultation is complete. The U.S. Fish and Wildlife Service concurred on June 17, 2026 with the Forest Service's "may affect, not likely to adversely affect" determinations for Canada lynx, lynx critical habitat, northern spotted owl, and gray wolf, and concurred again on September 8, 2026 after the July 2026 revision of lynx critical habitat reduced the designated acres within the project footprint.¹⁵ The wildlife constraints applied to treatment design, including the lynx and whitebark pine habitat limits, are project-level design choices. BRC asks that they not be treated as precedent for restricting recreation in future decisions.

BRC supports the condition-based approach to post-wildfire reforestation, which targets areas with high or moderate burn severity, basal area loss greater than 75 percent, and no natural seed source within approximately 100 feet, and which emphasizes fire-tolerant and drought-resilient species.¹⁶ Table 1 does not list reforestation acres. BRC asks the Forest Service to disclose in the decision document an estimate of the acres expected to qualify, so the public can see the scale of the planting effort.

Public Motorized Access and Recreation

The EA states that the project does not propose any changes to public motorized access, and that road maintenance would occur within previously disturbed areas of the roadbed, consistent

¹² EA/FONSI at 7-8.

¹³ EA/FONSI at 18.

¹⁴ EA/FONSI at 27 (Wildlife).

¹⁵ EA/FONSI at 32-33; see Revised Designation of Critical Habitat for the Contiguous U.S. Distinct Population Segment of the Canada Lynx, Final Rule, 91 Fed. Reg. 43,732 (2026).

¹⁶ EA/FONSI at 7 (Post-Wildfire Reforestation).

with current road maintenance levels.¹⁷ BRC supports both statements. The decision document should repeat them as commitments: no open road, motorized trail, or designated motorized route is closed, decommissioned, or reclassified by this decision. Any permanent change to the transportation system belongs in a separate travel management process with its own public involvement, not in a vegetation and fuels decision.

The EA acknowledges recreation effects. It lists "short-term closures of trails to recreational users" among the negative effects, states that road work may close some roads temporarily for public safety, and states that prescribed burns may "temporarily displace recreationists, particularly near dispersed campsites, hiking trails, and roads used for access."¹⁸ Recreation was dismissed from detailed analysis, and the EA does not say which roads, trails, or campsites lie within burn units or how long closures would last. BRC does not ask for a new analysis. We ask the Forest Service to add the following to the project design criteria in Appendix B and to carry them into the decision:

- Limit closures to the active burn unit or work area and a reasonable safety buffer, and reopen roads, trails, and dispersed sites promptly when conditions allow.
- Schedule burning and thinning near high-use roads, trailheads, and dispersed camping areas to avoid holiday weekends and, where practicable, fall big-game hunting seasons.
- Post closures at trailheads and on the Forest's website and social media in advance, with the dates and the affected roads and trails identified by name or number.
- Identify in the decision document the roads, trails, and dispersed campsites within burn units, and the expected duration of closure, so that the public can plan around them.

The EA lists winter sports among the recreational uses of the project area but does not identify any over-snow vehicle routes or areas, sno-parks, or groomed trails.¹⁹ Pile burning is commonly done when snow is on the ground. BRC asks the Forest Service to identify winter use areas and access points in the project area and to coordinate pile-burning schedules with those uses. BRC supports the road maintenance proposed for haul routes, which includes vegetation clearing in the road prism, culvert and ditch cleaning, grading, and reestablishing drainage features. These activities benefit every road user. We ask that roads used for haul be left at

¹⁷ EA/FONSI at 9 (Road Maintenance, Haul Routes, and Temporary Roads).

¹⁸ EA/FONSI at 9, 15 (Table 7, Recreation), 37.

¹⁹ EA/FONSI at 15 (Table 7, Recreation).

least as passable as before use, and that the Forest Service coordinate maintenance schedules so that work is completed ahead of the main recreation season.

The heading "Road Maintenance, Haul Routes, and Temporary Roads" refers to temporary roads, but the text does not describe any, and no mileage appears in the EA.²⁰ BRC asks the Forest Service to disclose whether temporary roads are planned, their approximate mileage, and their location, and to confirm that any such roads are temporary and are not built on or over an existing system route. If no temporary roads are planned, the heading should be corrected.

The project proposes 87.78 miles of fireline, including 14.50 miles of new dozer or hand line, 57.06 miles of new hand line, and 16.21 miles of existing line.²¹ The EA states that roads, trails, and natural barriers will be used as much as possible to reduce the need for line construction.²² BRC supports that approach and asks that it be treated as a requirement. Where an existing road, motorized trail, or established route can serve as the control line, it should be used rather than building a new line beside it. We also ask the Forest Service to confirm that existing and user-established routes used as control lines will not be closed or obliterated as part of fire preparation. BRC members do not want unauthorized routes to proliferate. They undermine the case for access everywhere. We therefore support rehabilitating new firelines after use, with water bars, slash, or similar measures, so that they do not become unauthorized routes.

Emergency Authority, Objection Process, and Compliance Documentation

The EA states that the project falls within the landscape identified by Secretary Rollins on April 3, 2025, that approval to use the Fuels and Forest Health Emergency Action Determination under Section 40807 of the Infrastructure Investment and Jobs Act was granted on November 18, 2025, and that environmental analysis on emergency actions is not subject to the pre-decisional objection process under 36 C.F.R. part 218.²³ BRC supports the use of every available authority to move hazardous fuels work forward. The EA also says that approximately 73 percent of the proposed project falls within the emergency action determination area.²⁴ The FONSI, however, states that the entire environmental assessment is not subject to the objection process.²⁵ BRC asks the Forest Service to explain how it is treating the roughly 27 percent of the project area outside the determination area, including which authority applies and whether that portion is subject to objection.

²⁰ EA/FONSI at 9.

²¹ EA/FONSI at 9 (Table 3).

²² EA/FONSI at 8 (Firelines).

²³ EA/FONSI at 35, 45; Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, § 40807 (2021).

²⁴ EA/FONSI at 4 (Purpose and Need).

²⁵ EA/FONSI at 45 (Emergency Authority).

The Purpose and Need section states that the project aligns with Executive Order 14225 and Secretary's Memorandum 1078-006, but the "Pertinent Executive Orders" section does not list either, and does not list Executive Order 14308.²⁶ BRC asks that the decision document list these orders. We also noticed a typographical error in the Determination of No Significant Impacts, which reads "and environmental impact statement will not be prepared" and should read "an environmental impact statement."²⁷

Federal Policy Supporting Active Management and Recreation Access

The Proposed Action is consistent with current federal policy. Executive Order 14225, Immediate Expansion of American Timber Production, directs agencies to increase timber production and reduce wildfire risk on federal lands.²⁸ Executive Order 14308, Empowering Commonsense Wildfire Prevention and Response, directs agencies to strengthen wildfire prevention and response.²⁹ Secretary's Memorandum 1078-006, Increasing Timber Production and Designating an Emergency Situation on National Forest System Lands, implements these priorities within USDA.³⁰

The Expanding Public Lands Outdoor Recreation Experiences (EXPLORE) Act, Pub. L. No. 118-234 (Jan. 4, 2025), directs federal land management agencies to expand and enhance outdoor recreation opportunities and improve recreation access on federal lands, including for OHV recreation. A project that reduces wildfire risk while keeping existing roads and trails open serves that direction.

BRC also supports a right-sized NEPA analysis. USDA's revised NEPA procedures at 7 C.F.R. part 1b, which the FONSI cites, and the Supreme Court's decision in *Seven County Infrastructure Coalition v. Eagle County* emphasize that NEPA is procedural and that agencies should focus on the information that informs the decision.³¹ An environmental assessment with a

²⁶ EA/FONSI at 4, 35-36.

²⁷ EA/FONSI at 45.

²⁸ Exec. Order No. 14225, 90 Fed. Reg. 11,365 (Mar. 6, 2025), <https://www.federalregister.gov/documents/2025/03/06/2025-03695/immediate-expansion-of-american-timber-production>.

²⁹ Exec. Order No. 14308, 90 Fed. Reg. 26,175 (June 18, 2025), <https://www.federalregister.gov/documents/2025/06/18/2025-11358/empowering-commonsense-wildfire-prevention-and-response>.

³⁰ USDA, Implementation of Secretarial Memo 1078-006, <https://www.usda.gov/sites/default/files/documents/implementation-secretarial-memo-1078-006.pdf>.

³¹ National Environmental Policy Act, Final Rule, 91 Fed. Reg. 17,062 (Apr. 3, 2026), <https://www.federalregister.gov/documents/2026/04/03/2026-06537/national-environmental-policy-act>; EA/FONSI at 44 (citing 7 C.F.R. § 1b.2(f)(3)(iii)); *Seven County Infrastructure Coalition v. Eagle County*, No. 23-975 (U.S. May 29, 2025).

FONSI is an appropriate level of review for a project of this type, provided the decision document captures the recreation commitments described above.

Conclusion

BRC supports the Lower North Shore Landscape Restoration Project and urges the Forest Service to finalize the decision and begin implementation in spring 2027 as planned.³² We ask that the final decision keep the project's commitment to no changes in public motorized access, add the recreation design criteria described above, and use existing roads and trails for fireline wherever possible.

We would like to close by saying we support “shared use”. As long as overall visitation numbers are appropriate for the affected resources, motorized and non-motorized users can be compatible with one another so long as individual users understand designations and plan their activities accordingly. Indeed, motorized and non-motorized recreation use often overlap as OHVs often increase accessibility to non-motorized recreational activities such as hiking, camping, equestrian use, etc. We also hold that responsible recreational use of public lands can exist in harmony with ecosystem needs.

BRC would like to be considered an interested public for this project and requests notice of the final FONSI and decision, and of each Section 106 phase and implementation notice.

Information can be sent to the following address and email address:

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Boise, ID 83702
brc@blueribboncoalition.org

Sincerely,

A handwritten signature in black ink, appearing to read 'Ben Burr', with a long horizontal line extending to the right.

Ben Burr
Executive Director
BlueRibbon Coalition

A handwritten signature in black ink, appearing to read 'Simone Griffin', with a stylized, cursive script.

Simone Griffin
Policy Director
BlueRibbon Coalition

³² EA/FONSI at 45 (Anticipated Implementation of Authorized Activities).