



Kristin Bail, Forest Supervisor
Jeff Rivera, Wenatchee River District Ranger
Upper Wenatchee Pilot Project comment group.

Re: UWPP EA and Comment Period

2/2/2021

We are the Lake Wenatchee Fire Adapted Communities. We and our communities are located directly within the Upper Wenatchee Pilot Project planning area.

Our mission is:

To protect life, property and the environment while providing education and outreach to build a community, culture, and landscape resilient to wildfire.

Where other plans have failed, the Upper Wenatchee Pilot Project is taking wise steps to consider the health of our forests, waterways, wildlife and human residents in and around the area to collectively build a sustainable future. Previous efforts often considered only trees, only people, or only what is within one landowners' jurisdiction at a time. None can thrive alone, without consideration of all of the intertwined ecological, economic and cross jurisdictional factors. This holistic approach is essential for success.

As a consensus position, Lake Wenatchee Fire Adapted Communities supports **Alternative 1** as a minimum. Alternative 2 and the status quo option simply do not move the forest and community forward enough to alter the dangerous conditions present today.

After attending planning and subgroup meetings for the last three years and reading the available documents, several points arise from members of our Fire Adapted Communities organization.

1. We are concerned that very large areas of unhealthy forest are removed from active management in the plan, reducing the work area from 74,000 acres down to 36,900 acres. This reduces the effectiveness of all treatments and some plan should be identified for this acreage. Even if the intent is to let it naturally burn.
2. The plan does not specifically call out Wildland Urban Interface protection in mapping. While the approach is holistic, community protection is a top priority and identifying these features aids in directing implementation priorities.
3. In adaptive management, the plan does not clearly define criteria that would direct the on the ground decision making for providing fire resiliency. Where thinning is recommended in the plan, examples should be provided of what each level of thinning or clearing should look like as an end state. This would provide clarity for monitoring and accountability.
4. The project needs to start at the highest risk areas and expand across the project into lower risk areas. Lake Wenatchee Fire Adapted Communities believes the highest risk areas are around the

communities and private lands. Data currently exists from LWFAC wildfire home assessments and triage mapping that were conducted over the last two years and directs prioritization of our most endangered residences and properties. This data was collected with financial support of the Chelan Pilot Project.

5. Maintenance of the existing and proposed community protection lines are a priority to allow the return of fire to the landscape in a safe and controllable way. Any fire that burns now, will not burn in a natural way. Dead standing and ground fuel loads are far beyond the level that can be managed safely. Following existing Potential Operational Delineations (POD) lines would support fire management efforts and help segment fire activity.
6. Prioritize shaded fuel breaks and treatments in locations that would increase snowpack longevity and increase water quantity. The shaded fuel break on Natapoc should continue to the most southern extent of the project area following the full length of the Forest Service boundary.
7. We support prescribed burning to improve and maintain forest health treatments throughout the project area. Currently the 200-300 acres per year in prescriptive burning has been inadequate. Cooperative options with private landowners should be more aggressively pursued to develop continuity of control features utilizing the Wyden amendment.
8. Burning of ground fuels is advantageous to overall forest health. Local air quality monitoring will be needed in consideration of management of human health, to maintain public support of these positive efforts.
9. The plan should identify and seek out alternatives to broadcast burning to extend burn windows and provide additional fuels reduction opportunities within the Wildland Urban Interface. Alternatives should include pile burning, pre-commercial thinning, chipping and masticating of residuals.
10. The Forest Service should heed the recommendations and lessons learned by the North Central Washington Forest Health Collaborative (NCWFHC) economic subgroup to create consistent and viable timber sales and secure the continuity of funding for project goals. Lake Wenatchee Fire Adapted Communities supports the utilization of Stewardship Contracting to facilitate the revenue generated from timber harvests to stay on the Wenatchee River Ranger District, and to specifically fund non-commercial fuels reduction work adjacent to private lands as well as aquatic restoration.
11. The plan needs to look beyond timber harvest for financial solutions. The Forest Service should actively plan and pursue alternate revenue streams and source funding to ensure all phases of implementation. The plan must articulate the need to effectively initiate work on program goals and to ensure that implementation finds a fast start and sustained momentum over the life of the Pilot Program.
12. Regarding trails and roads. The plan must work to improve both access and egress. To allow for safe evacuation routes from communities and to enable responding suppression teams to engage fire rapidly and effectively. Reduction of fuels along escape routes should be specifically addressed.
13. Reopening the Camp 12 road egress is a high community priority. Closure of this escape route has created a highly hazardous, limited egress and access issue for the Ponderosa housing area
14. We strongly urge the Forest Service to support and participate in a community monitoring work group to assure both understanding and accountability. The Forest Service should commit to annual reporting


on the project and its yearly goals and successes. Continuation of open and frequent communication with the public, Fire Adapted Communities and partner agencies should be defined and ensured throughout the project timeline.

Private landowners and LWFAC have invested substantial resources to mitigate hazards and improve forest health where they can. Partnerships between LWFAC, Cascadia Conservation District, WA DNR, 14 Firewise communities, Lake Wenatchee Fire District, NCWFHC, and individual landowners have offered numerous successes.


The community though remains in the midst of a forest that is compromised by disease and suffers from the effects of society's historically misguided management and fire practices over the last century. Plain, Lake Wenatchee and the UWPP area have been identified as the #1 WUI fire risk in Washington State.

As the single largest landowner and manager of forest land, the Forest Service must find a path to successfully implement the Upper Wenatchee Pilot Project. A failure to do so could very well set the stage for a catastrophic fire that will destroy our beloved community and leave the environment and habitat in a devastated condition that will not see recovery for hundreds of years.

We are thankful for the leadership and efforts of all the Forest Service staff to get us this far over the last four years. We are encouraged that the essential and rewarding work is ready to begin on the ground.



David Walker – Chair LWFAC



Jim Passage – Vice Chair LWFAC