

## Lake Wenatchee Fire & Rescue

21696 Lake Wenatchee Hwy Leavenworth, WA 98826 Phone 509.763.3034 Fax 509.763.8800 LWFR.org

2/10/2021

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

Lake Wenatchee Fire and Rescue provides primary fire, rescue, and ems response to the communities of Plain, Lake Wenatchee, White River, and the Ponderosa and Chiwawa Pines neighborhoods. These communities are centered in the middle of the UWPP and have been identified as the #1 Wildland Urban Interface threat in Washington State.

LWFR provides numerous fire prevention and fuel mitigation programs on private and public land within the Upper Wenatchee Pilot Project area. LWFR also provides first response and initial attack for rescue, EMS, and fires on National Forest lands. LWFR responds to dozens of fires annually on these lands, protecting the forest, our community, and approximately 4 billion dollars of public and private assets from catastrophic fires.

We would like to first express our support of the overall concept of the plan. A holistic and comprehensive look at forest health and the communities intertwined within it has been long overdue. Historic management has struggled against a no-fire policy that has kept natural fire out of the heart of the area for 120 years. Coupled with a Northwest Forest Health plan affecting over half of the planned area, we have been left with a forest that is diseased, fire-prone, and unhealthy. It is time to help it reset and become more viable as a habitat for birds, fish, humans, and large mammals.

In a basic evaluation of plan options, **Alternative 1** appears to provide a minimal needed amount of community protection and land segmentation to be able to return natural fire to the forest landscape. These plans, combined with additional shaded fuel breaks within 300 ft of all access and egress roads to ensure community safety, the plan becomes workable.

After following regional forest health planning and all of the available documents, several questions and observations are brought to our attention.

• The plan unexplainably removes over half of the project area from active management, reducing the project area to 36,900 acres. These removed lands should be additionally managed and segmented or modified to a mosaic structure. If the intent is to let these large segments burn uncontrolled, the plan should identify that high-risk decision and the impact on treated areas.

- Roads and trails. Primary egress and access roads should be identified in the plan and improved
  and bordered by shaded fuel breaks as have been done on other forests. Camp 12 road needs to be
  reopened. The closure of the Camp 12 road cut off a safe escape for Ponderosa community
  members.
- Trails in the project area were not evaluated in the plan. Trails provide access for fire crews to reach deep into the forest. The opportunity to improve existing trails and add trails to prominent locations should be part of the plan for forest health. Some of the vehicle road closures are already undrivable accesses but may be opportunities for establishing foot trails at these locations.
- Static and ongoing monitoring is not addressed clearly in the plan. Firm timelines, measurable benchmarks, and accountability lead to the success of any mission or project. Ongoing monitoring will need to be in place for the duration of the project. We encourage the forest service to implement monitoring on multiple levels.
- Within the Forest Service, the project should be formally reported on and reviewed annually. As a
  community partner, there is an opportunity to commit to third-party community monitoring that
  bridges the gap between internal operations and the community's understanding and support of the
  projects implemented. Connecting with local residents, college, and high school students are all
  possibilities that should be considered.
- There is no mention of monitoring conditions specific to precommercial thinning and timber removal. The management plan should ensure that slash is handled in conjunction with removal so that the fire risk is not increased during implementation.
- Electronic monitoring was not addressed in the plan documents. Forest health electronic
  monitoring has been successfully utilized on other forests. The UWPP is an excellent candidate for
  long term electronic monitoring.
- A periodic schedule of satellite or lidar imagery should be considered to support the monitoring of the project.
- The placement of permanent local air monitoring is a goal of our resident communities. Smoke management has been a challenge for land treatment on this forest but is not mentioned in the plan. One regionally discussed option would offer the opportunity for multi-layer air monitoring in utilizing LWFR Fire station 93 and the Forest Service tower on Natapoc ridge. Quality air monitoring has both scientific value and practical land use and fire management applications. Local air monitoring would improve human health and fire management efficiency. Currently, we all are reliant on inaccurate down valley monitoring.
- Permanent camera options for monitoring are a consideration that has not been identified. They are available to monitor both ongoing forest health changes utilizing a perpetual series of still photos, and thermal recording can identify fire activity rapidly. Three locations are currently viable for camera location. The Natapoc ridge tower, Nason ridge/Round Mountain abandoned fire lookout and Pole ridge. Any two sites would give a near-complete view of the project area. Can this be done in cooperation with the UWPP?

- With the extreme fire hazards currently present, audible (Tsunami type) warning systems should be installed along North and South Shore roads and near Fish Lake. LWFR has installed evacuation sirens at Chiwawa Pines and at Ponderosa, where we have property. We recommend the same or better type system be installed on Forest Service controlled lands that interface with vulnerable human populations. The need for these systems has been made unfortunately apparent by events such as the Paradise CA Fires.
- Other projects have made local firewood cutting available. Targeting forest firewood harvest to specific locations is beneficial to both the forest and local residents in a rural community, particularly the elderly and low income. Is there any reason we couldn't achieve this favorable option for local residents?
- Fire management receives limited direct content in the plan. While aquatic improvements and shaded fuel breaks help reduce the overall threat of uncontrolled fires in the plan area, fire management features are not clearly identified. The absence of fire for over a century has created a highly volatile landscape. We would recommend a specific plan to segment and treat (via fire or thinning) the majority of the landscape. It is assumptive that any area not planned for treatment will burn uncontrolled. Control points within the UWPP should interact across jurisdictional lines. Features on Forest Service land should work with features on co-bordering private and public land. Fire breaks should be a minimum of 300 ft when bordering other fire control features such as roads, aquatics, thinning operations, or similar work on adjoining private land.
- When used as a stand-alone feature, the fire breaks should be increased to a 500 ft width of graduated density.
- Control features such as thinning should be implemented along the south shore road where steep
  hillsides limit fire attack. The efforts should be continued south over Nason ridge into the Nason
  Creek drainage.
- There is not clear prioritizing for implementing the needed work in the proposed plan. Lake
  Wenatchee Fire and Rescue believes that starting near private land and valuable public assets is a
  priority allowing the planned treatments in the greater project area to move forward more safely
  and efficiently.
- Lake Wenatchee Fire and Rescue responds to dozens of fires on Forest Service land annually. Many of these fires are started in formal and informal recreation sites. The UWPP should identify these formal and informal sites for thinning operations for 500ft around the active areas to reduce uncontrolled fire threats to the public and the forest. On several occasions, our responders have been forced into taking what we consider to be an over-aggressive stance that was dangerous. This was done as an effort to prevent abandoned recreational fires from moving into heavy fuels and threatening residential areas. Preplanning would prevent these risky operations.
- Recognizing the currently dangerous state of the forest, a greater commitment for suppression
  resources needs to be identified in plan management. Often, in the most critical months, we find
  that Forest Service and DNR suppression resources are diverted to far off fires, hampering the
  initial attack of uncontrolled fires here. While the fire is being slowly returned to this landscape, a
  clear plan to provide adequate fire protection must be articulated and implemented.

• The scale and needed pace of this project does not seem possible with timber harvest dollars alone. Additional funding must be sought from federal and State sources. This possible funding and action on the ground can have the potential to save tens of millions in fire suppression costs or billions of dollars in infrastructure loss.

Lake Wenatchee Fire and Rescue appreciates the ongoing partnership with our National Forest leaders. We believe strongly that the UWPP can be a very successful model for other forests and communities to follow. The 3,500 resident families that call the upper Wenatchee area home rely on healthy forests, clean air, and water. A catastrophic fire would destroy it all. They all are depending upon this pilot project's success.

Rollie Schmitten, Board Chair

David Walker, Fire Chief