February 11, 2021

Mr. Jeff Rivera

Wenatchee River District Ranger

Leavenworth, WA 98826

**Comments on the Upper Wenatchee Pilot Project #49124 Draft Environmental Assessment**

Dear Jeff,

We have lived at the Kahler Glen community in Chelan County for 14 years. During that time, we have been very active in many of the wonderful recreational opportunities this wonderful area sustains. We moved here to be close to public lands, like the National Forest and Lake Wenatchee State Park, to hike, bike, ski, kayak, wildlife watch and enjoy the natural beauty that surrounds us. Once a month we participate in the Upper Basin Bird Survey that has been collecting data on birds in the upper Wenatchee River basin for over 25 years. Unfortunately, we also packed our cars with our belongings because of the Chiwaukum Creek fire in July of 2014. Luckily, the winds and efforts of fire crews kept that fire away from us.

We appreciate all the hard work that you and your team have done with drafting this assessment. We hope that the consultants on this project work closely with you and the USFS specialists that work here in our district.

We recognize that managing a forest in a fire prone area is challenging, especially with the growing urban interface and the suppression of fire for over 100 years. Dealing with unhealthy, overcrowded forests that have beetle and moth infestation, root rot, and areas where non-native trees were planted (Montana ponderosa) and not adapted well, add to the difficulty before you.

Facing this challenge, the Forest Service must avoid taking actions that impact important resources such as late successional forest, old-growth habitat, and sensitive wildlife species. Humans are but one consideration in the development of this plan. We knew when we moved here that fires in the summer were a real risk. Catastrophic fires are as bad for the wildlife as they are for us humans.

Our primary concerns are:

* The plan should focus fire reduction strategies on the lands near the houses (e.g., Plain & Lake Wenatchee shoreline) and engage private landowners in protecting their homes from fire on their lands. It will be important to coordinate with and involve other large private landowners in the area, such as Western River’s Nason Ridge property and the State Park lands.
* We suggest that you clearly identify and prioritize a reduction of the fire danger on forest service property in areas where there is only one way in and out for residents. These include Shugart Flats, Ponderosa, Kahler Glen and South Shore, and River Road.   Most of these areas do not have a safety zone.  The sooner this can be started the better.
* The plan needs to identify and give high priority to constructing shaded fuel breaks to a maximum of 300 feet, where significant private and public federal lands interface. The plan should also identify how you will maintain these fire breaks in the future. Ongoing maintenance is a necessity.
* The plan should identify how slash from logging and treatment operations will be incorporated within the project and “cleaned up.”
* The plan should provide greater protectionfor late-successional forests, roadless areas, spotted owls, and other wildlife. This includes the need for added protection of security habitat for grizzly bears and wolverines – for foraging and dispersal/connectivity.
* The importance of old growth, mistletoe clumps for nests, significant second growth forest, and snags should be mandated including no cutting of trees over 80 years old in LSRs, maintenance of the LSR standards in the NW Forest Plan, and no cutting of trees larger than 21” dbh in LSRs.
* We support the importance of decommissioning roads for both aquatic and terrestrial benefits. Under no circumstances should ORVs be permitted on decommissioned roads, especially in habitat supporting sensitive species.
* The plan should provide full protection for the corridors of the Wenatchee and Chiwawa Rivers, which were recommended in the NF Forest Plan for inclusion in the Wild & Scenic River System.
* Consideration must be given to resident and migratory birds that nest here, therefore limiting and/or closely monitoring treatment activities during nesting seasons.

If you have any questions for us, please let us know.

Sincerely,

Mary and Tim Gallagher

20679 Miracle Mile

Leavenworth, WA 98826

206-650-7511