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Submitted to: <https://cara.ecosystem-management.org/Public/CommentInput?project=49124>

Subject: Upper Wenatchee Pilot Project Draft Environmental Assessment

District Ranger Rivera:

The Sierra Club has reviewed the draft Environmental Assessment (EA) for the Upper Wenatchee Pilot Project and offers the following comments on the proposal, the impacts, the need for additional time to review the document and the proposed actions, and the need for a full Environmental Impact Statement.

1. Overview

Long Term Sierra Club Involvement

Members of the Sierra Club have used the lands in this analysis area for decades and have been involved in the plan management of these national forest lands throughout the original forest planning process which resulted in the Wenatchee National Forest Management Plan (1990), and the subsequent Okanogan-Wenatchee Forest Plan Revision, which is still pending, as well as the 1994 Northwest Forest Plan, and the forthcoming revision process for that regional plan. And, of course, our members have spent many hours on the trails, campgrounds, roads, towns, lands and waters of the Wenatchee River and its tributaries. Thus, we have a high interest in, and substantial familiarity with this area.

Reasonable Project Goals, But High Risk Proposed Action

We recognize the unique elements of the Pilot Project area: a convergence of National Forest and State Parks lands with high recreational value alongside private lands and inholdings, superimposed on a landscape that is naturally fire-prone. Historical logging and

land management patterns have in some areas increased the likelihood of catastrophic wildfires, and wildfires of the past have had lasting impacts on the people who live near these natural areas. We appreciate that the Forest Service recognizes the impacts of their management decisions upon the environmental, social, and economic system within and around the National Forest, and we agree in concept with many of the needs that the Upper Wenatchee Pilot Project is designed to address. We do, however, have substantial concerns with the scale and lack of specificity of the proposed action, including elements that appear to be missing or understated in the draft EA. Some of these concerns were presented in our comment letter during the scoping stage of the project, but remain unanswered. Other concerns have been raised after a review of the draft EA. These concerns are as follows:

2. EIS Requirement

Scope, Scale and Length of Time Require EIS

The alternatives proposed in the EA would perform “treatments” within Nesting, Roosting and Foraging (NRF) areas of the Northern Spotted Owl (NSO), a federally protected species that continues to struggle against extinction. According to Table 2.6-1 of the draft EA, the acres of treatments within NSO NRF Critical Habitat would comprise 27% of the total acres treated in Alternative 1, and 18% of total acres treated in Alternative 2. Acres of treatments to NSO Dispersal Critical Habitat would comprise 46% of the total acres treated under Alternative 1, and 52% of the total treated acres under Alternative 2. Additionally, per the draft EA (p 3-73):

A total of about 6,000 acres of NRF habitat could be lost (i.e., downgraded to dispersal or lower level habitats) under Alternative 2 (compared to about 10,000 acres under Alternative 1); this includes about 660 acres that would be potentially cleared via the stand regeneration treatments (i.e., converted to non-habitat), with the remaining areas thinned or converted to shaded fuel breaks (i.e., resulting in the conversion of NRF to dispersal habitats). About 12 acres of shaded fuel breaks would be developed within 0.25 miles of the Activity Centers; however, these treatments would be required to retain the percent canopy closure necessary for NRF habitats (i.e., at least a 60 percent closure). Alternative 2 could result in the loss of about 17,000 acres of dispersal habitats (including about 1,300 acres that would be potentially cleared via the stand regeneration treatments, with the remaining areas being thinned or converted to shaded fuel breaks).

It would seem to be impossible for the impacts of such proposed actions to lead to a Finding of No Significant Impact. For this reason alone, a full Environmental Impact Statement (EIS) should be prepared for this project.

The scale and timeframe of this project should also trigger a full EIS. This project proposes to implement a management structure on 75,000 acres of land within 4 sub-watersheds, including more than 60,000 acres of National Forest land. In contrast, the 2007 Natapoc Ridge Forest Restoration Project developed an EIS for a restoration plan that comprised just over 11,000 acres, a fraction of the area involved in this project. Just the scale of the Upper Wenatchee project should require an EIS to satisfy NEPA requirements. The project timeline, spread over 15 years, would support the need for a full EIS. This is not a small project in which the impacts and repercussions of the proposed action are insignificant. This

project is enormous in scope, scale and time, and the complexity of the issues it attempts to rectify. For this reason, this Pilot Project should require an EIS to study not only the project specific impacts, but the cumulative impacts on the environment of this and related projects in the nearby areas of the national forest.

Forest Plan Amendments Require EIS

The project also proposes to amend the existing Forest Plan in order to alter the management activity within Late Successional Reserves (LSR), in particular to allow the removal of trees over 80 years old within LSRs. Existing land use allocations were established for the Forest through the original Forest Plan and the Northwest Forest Plan via EIS. Amendments to these existing land use allocations using anything less than an EIS process is not consistent with NEPA requirements.

3. Monitoring & Adaptability

Failure to Meet Restoration Strategy Requirements

The elements of a plan to perform adaptive ecosystem management to restore landscape resiliency is outlined in *The Okanogan-Wenatchee National Forest Restoration Strategy* of 2012 (Restoration Strategy), and it is the methodologies outlined in this Strategy that appear to form the basis for the landscape modeling and planning outlined in the Pilot Project. This Pilot Project provides a landscape-scale opportunity to monitor and test the fuel reduction techniques and ecosystem improvements that are being proposed. The term “Pilot Project” by definition implies an attempt to evaluate the feasibility, efficacy, cost, and practicality of the management activities described. It is therefore concerning that Monitoring is only discussed in the draft EA in three sentences (p 2-35).

According to the Restoration Strategy as developed by the Forest, and upon which this restoration plan was developed:

“Adaptive management ...requires monitoring to determine if management actions are leading to desired outcomes.” (p59, Restoration Strategy)

“..prior to developing a monitoring plan, a general list of potential project actions is helpful... These actions should be specific, and large actions should be broken down into component parts where effects may be measured. Based on these actions, the FRS Team should develop cause-effect chains that are transparent and understood by stakeholders.” (p 71, Restoration Strategy)

“...thresholds and contingencies should be built into programs, as well as NEPA documents. If there are threshold measures that would trigger immediate changes in management actions, these should be spelled out at both the program and project levels. Contingency plans may be built into the Restoration Strategy program, and into any specific NEPA projects. These may be analyzed as part of the NEPA process. By establishing thresholds and contingencies ahead of time, and clearly defining and analyzing these in a NEPA document, adaptive management may occur promptly...” (p71, Restoration Strategy)

The Restoration Strategy even provides “Some Effectiveness and Validation questions for the Restoration Strategy” in “Hot Box 6” (p 73, Restoration Strategy).

Failure to Meet NW Forest Plan Monitoring Requirements

The Northwest Forest Plan also discusses in detail the needs and requirements of Monitoring (NWFP, p E-3 ff). Per the NWFP, “Adaptive management is based on monitoring that is sufficiently sensitive to detect relevant ecological changes. In addition, the success of adaptive management depends on the accuracy and credibility of information obtained through inventories and monitoring.” (NWFP, p E-3). This Implementation section of the NWFP provides clear and relevant guidelines in the development of monitoring standards and goals for an adaptively managed landscape.

It is clear from these excerpts, as well as from the entirety of the text within the Restoration Strategy and the Northwest Forest Plan, that monitoring of the restoration projects is key to the successful implementation of an adaptive management strategy. Implementation monitoring is a primary need: have the projects been carried out according to plan? This is critical, potentially when the projects outlined in the draft EA are as vague and open-ended as they are being proposed. Secondly, effectiveness and validation monitoring must be delineated, and include questions such as:

- Who is doing the monitoring?
- What are they monitoring for?
- Are the treatments effective?
- What are the impacts of those treatments?
- Are those impacts within the range outlined in the environmental document?
- How do unplanned actions, such as windstorm or fire, affect the ability to achieve the stated purposes and how are the impacts of such actions incorporated into the environmental review?
- Are they practical?
- Are they cost effective?
- Was funding made available?
- Did partners provide the resources as promised?
- Were the assumptions upon which the treatments were prescribed accurate?

These monitoring efforts must be maintained over a practical length of time, particularly since the management techniques may not be put to the test for some time—the movement of a wildfire towards the pilot project area may be years away. And critically: how will the management actions of the Forest change given the results of these effectiveness and validation monitoring? The Restoration Strategy makes it clear that all these elements are necessary for a successful adaptive management plan, and that these things should be developed during the NEPA process.

They are currently missing from the draft EA. A robust, effective, and clear monitoring plan must be developed for this project that describes the implementation, effectiveness, and validation monitoring for the proposed actions.

The plan must also address the issue of changes to the forest condition due to unforeseen events. For example, if a wildfire were to enter into the project area within the lifetime of this pilot project, a supplemental plan document must be prepared. Questions to address

within this project include a consideration of what the threshold of impacts would be to trigger changes to the project.

4. Entry into Late Successional Reserves (LSRs)

Contrary to NW Forest Plan

The project proposes to enter into LSRs to restore the habitat to historical conditions, reduce crown fire potential, and reduce the susceptibility of the forest to insect and disease impacts. The Northwest Forest Plan does allow entry into LSRs for these purposes, but specifies that these actions should “focus on younger stands in Late Successional Reserves.” (NWFP Standards and Guidelines, p C-13) Additionally, activities in older stands may only be appropriate if, among other items, “the activities will not prevent the Late-Successional Reserves from playing an effective role in the objectives for which they were established.” (p C-13). As discussed above, the impacts to NSO habitat described in the project documents, particularly in regard to the loss of NSF and dispersal habitat, would be contrary to this requirement.

Failure to Distinguish Between 80 Year Old Stands - Natural or Human Caused

The plan as outlined in the draft EA would enter into LSRs and, if Alternative 1 is chosen and if a Forest Plan exception is granted, would allow cutting of trees within the LSRs that are older than 80 years old.

A review of the mapping of Timber Activities provided in the draft EA shows that those LSRs being considered for such aggressive treatment within Alternative 1 are forested areas that predominantly have not had any previous timber activities. The expectation would be that these forested areas would be those that are closest to the historical condition of any of the forests within the watersheds. It would be reasonable to assume that smaller diameter trees and brush has grown into the stands, but it would not be reasonable to assume that commercial thinning or cutting of trees greater than 80 years of age would improve the forest stands. Additionally, it would not be reasonable to trade the ecological impacts to the NSO and other old-forest dependent species for the clearly damaging short-term impact of heavy treatments.

Stands created by logging prior to 1940 may also have late-successional characteristics, depending on the type of logging and subsequent management. Dense stands resulting from clearcutting and reforestation may benefit from thinning, but the relevant conditions and the proposed prescriptions must be clearly outlined.

The map (Figure 3.2-1) only shows timber activities since 1950 (but you must look at Table 3.22 to understand that, as neither the title on the map “Activity” or the legend provides this information.

Large & Old Trees Need Definition and Protection

The definition of “large diameter trees” must also be corrected in the project documents. The draft EA sets a 25-inch dbh as the limiting size that will be cut through this project, though there are also ample caveats to this limitation. The project document continually describes these 25-inch dbh trees that are being retained as “large trees.” The definition of these trees

is incorrect according to the Forests own Restoration Strategy. According to the Okanogan-Wenatchee National Forest Restoration Strategy (2012) (p 103):

Generally, conditions in the Okanogan-Wenatchee National Forest are such that large trees vary from 20-25 inches dbh. Thus, we recommend the following distinction in describing large trees:

Large.....20-25 inches dbh

Very large.....>25 inches dbh

Therefore, either the Forest is incorrect throughout their project document and should be restricting the tree sizes to be cut to 20-inches dbh or less to protect “large trees,” or more precisely they should be correctly identifying these trees accurately as “very large trees”.

Regardless of which correction is made, the Restoration Strategy continues, “There is strong scientific rationale for retaining old trees, even those in close proximity to each other.” (p. 101), and “The most ecologically effective clumps in most stands are composed of old trees and there is strong scientific rationale for retaining all of them, even those in close proximity to one another.” (p 101). It is clear that the proposed removal of trees older than 80 years, and trees larger than 20-inch dbh (or very large trees >25-inch dbh) within LSR areas that have not had prior timber activity is contrary to the results of the scientific analysis presented in the Forest’s own Restoration Strategy.

Trees over 20-inch dbh should not be removed in normal thinning operation, and those over 25-inch dbh should be cut in only the most exceptional circumstances. These treatments should not be a backdoor to commercial logging.

5. Inventoried Roadless Areas (IRAs) and Unroaded Areas

Inadequate Information and Acknowledgement of Inventoried Roadless Areas

The draft EA does not show any Inventoried Roadless Areas on project maps. This must be corrected. The current mapping shows Land Use Allocations from the Land and Resource Management Plan (1990) and the Northwest Forest Plan (1994), but these maps must also show the locations for Inventoried Roadless Areas defined through the Roadless Area Conservation Rule (2001). Administratively Withdrawn Areas do not include all of the IRAs (map figure 1-2) both categories are withdrawn from timber harvest. While restoration activities can occur within IRAs under limited circumstances, no new roads (including temporary roads) can be built within IRAs to access the restoration areas. While temporary roads are currently shown on a few maps within the project document related to wildlife, and it appears there are no temporary roads proposed in IRAs, it is critical that IRAs are shown on all maps that propose restoration activity, as well as any maps that show road work. IRA limits are critical in discussions regarding forest restoration limits and methodologies, and should be a standard layer presented on maps.

Outdated References

Additionally, the draft EA refers to Inventoried Roadless Areas covered under the “Standards and Guidelines for Key Watersheds” (p 3-175) as “inventoried (RARE II) roadless areas.” This reference is outdated, and implies that the RARE II inventory would be used to restrict

or allow road building within the watershed. This reference needs to be removed and/or modified to clarify that IRAs are defined by the Roadless Area Conservation Rule.

Need for Full & Explicit Protection of Unroaded Areas

Actions in inventoried roadless areas and other unroaded lands must meet all requirements to protect and retain their present character that are consistent with the direction of the Roadless Conservation Rule. This Project must not take any actions that would prevent any unroaded lands from being inventoried per the current direction in FSM Chapter 70 (Wilderness Inventory and Evaluation Process), particularly the Grouse Creek/Marble Creek region in the Chiwawa River drainage, the Big Meadow Creek/Brush Creek region, as well as the northern slope of Nason Ridge between the Administratively Withdrawn Special Interest Area and Lake Wenatchee. However, we see significant active management within roadless areas on the alternative maps. While specifically targeted actions without roads and that retain the full late successional character may be appropriate, the scale and extent of the proposed actions far exceeds that standard.

6. Roads and Aquatics

The proposed action includes a number of positive actions towards restoration of aquatic habitats and contributing to improved populations of numerous species, especially the anadromous fish. However, the plans for roads needs substantial further work.

Inadequate Plans & Commitments for Road Removal

The draft EA is not clear regarding road and aquatics work to be undertaken. The draft EA refers to “opportunities” and “proposed actions” as identified through the Transportation Analysis Process (TAP) and through the Aquatic Habitat Assessment and Restoration Report (Cramer, 2019). The discussion of the TAP within Section 3.9 Transportation describes the miles of roads within the project area that the alternatives would close, reduce in Maintenance Level, or decommission. However, there is no map within the draft EA that shows these proposed changes. The project documents on the Forest project website also do not include any mapping from the TAP, with the exception of one map which appears to only have partial information. A map of the proposed road modifications that would accompany the alternatives must be provided within the project document.

Also, during the Virtual Meeting that the Forest hosted on January 20, 2021, Matt Karrer, the hydrologist for the Ranger District, described the TAP process and the results of the process. By his description, the TAP process is designed to analyze the road system and make recommendations to the Line Officer for implementation. Per Karrer, TAP doesn’t make decisions, it makes recommendations. Karrer also clarified that his discussion of the road modifications and road improvements was “assuming [the Forest would] implement all TAP recommendations.” Karrer also stated that many of the 250 sites that had some degree of road damage would receive “routine maintenance” to correct the issues that are causing resource degradation, and that the 33 sites with severe damage, would receive “prioritization” for restoration/mitigation.

This presentation of the road improvements is also reflected in Chapter 2 of the draft EA, wherein the Cramer report is used to support the general description of “restoration opportunities” within the watersheds.

All of these descriptions of “opportunities” do not provide any timeline or definition for road improvement and aquatic protection. Some examples of concrete information that must be provided in the project documents:

- Are all of the recommendations proposed within the TAP going to be implemented?
- Provide a map of the proposed road modifications for the alternatives.
- How much money is currently in the road maintenance budget to provide the “routine maintenance” that 250 sites need, particularly when Forest Service budgets for road maintenance have been severely reduced over many years?
- What is the prioritization for these road and aquatics projects? If the Line Officer will be the deciding official, what elements will drive the decision-making? Will funding be the deciding factor? What if non-forest funds are allocated to the work? Will resource protection take precedence over timber extraction? Of the 33 sites that have severe damage, what does “prioritization” mean in terms of timeline? Some of these projects can be very expensive to implement. Will these projects be done first? Or will they be postponed?

7. ML1 Roads Not Converted to Motorized Trails

There should be no increase in motorized trails through this Pilot Project.

On page 3-182, the draft EA discusses Road Closures, and the placement of roads into ML1 status. Bullet point 3 of the list that follows includes the statement “They may be managed and designated as a motorized trail and/or may be available and suitable for non-motorized uses.”

This statement is contrary to Forest Service roads standards, outlined in FSH 7709.58, Transportation System Maintenance Handbook, and summarized in Table 3.9-3. Per FSH 7709.58, ML1 road maintenance is defined as: “Appropriate traffic management strategies are “prohibit” and “eliminate.” ... However, while being maintained at ML 1, they are physically closed to vehicular traffic, but *may be open and suitable for non-motorized uses.*” (emphasis added)

The Forest is required to undertake a Travel Management Plan to study and delineate the usage of Forest roads and trails for motorized and non-motorized uses. This process is currently on hold in the Okanogan-Wenatchee National Forest. Until this process is undertaken, the establishment of any new motorized off-road trails, including any that may be considered for incorporation into a future motorized “trail system” is inappropriate and should not be allowed. Motorized trails need to be analyzed through the TMP process, and not allowed through the Pilot Project, a project which is designed to “improve wildlife habitat.” Increasing motorized off-road access would be contrary to the purpose and need of the Pilot Project.

8. Prioritization

Inadequate Prioritization

In addition to the prioritization that must be provided for the aquatics and roads “opportunities” within the Forest, a broader scope of prioritization and financial analysis must be presented within the project documents. A landscape scale project of this scope, intended to be carried out over at least 15 years, requires that there be decisions made to establish which projects will take precedence. A clear prioritization matrix will help in establishing the hierarchy of project importance, in particular when/if current Forest staffing changes over the years and the project document provides the sole point of reference for future management decisions.

This broad-scale prioritization must present the guidelines with which the implementation of the project will be carried out. Some questions that might need to be answered:

- Will projects be designed to focus primarily on fire safety near developed areas? Will these projects be carried out first?
- Will ecological restoration for NSO habitat take precedence?
- Do those lands furthest from their historical range of variability take precedence?
- Will projects with severe aquatic degradation (roads work) take priority over non-commercial thinning?
- Will non-commercial thinning and burning be performed despite the cost to the District, and despite the challenges of scheduling prescribed burns (air quality, etc)?
- Will timber extraction through commercial thinning take precedence over those activities that cost the district money?
- How will the proceeds from commercial thinning sales be spent? Will these proceeds be used only for subsequent restoration projects within the project area?

9. Wild & Scenic Rivers

Inadequate Protection for Values of Agency Proposed Wild & Scenic Rivers

The draft EA presents the following as the entire discussion of Wild & Scenic Rivers:

“3.11.2.7 Wild and Scenic Rivers : The project area does not encompass and/or adjoin Wild and Scenic Rivers”

However, the Project area does include the following eligible rivers as identified in the 1990 Forest Plan: Napeequa/White, Chiwawa and Wenatchee Rivers. (LRMP p II-7, Table II-3) In addition, the Forest Plan revision process currently on hold identifies the Little Wenatchee River, Nason Creek, Raging Creek, and Rock Creek as eligible rivers. (Northeastern Washington Forest Plan Revision, Review of Potentially Eligible Wild and Scenic Rivers, dated 6/22/2011. See page 3, Table 1.)

This project must present an analysis that demonstrates that the proposed alternatives would in no way degrade their values, which include wildlife and scenic values of the adjacent forest, within a quarter mile of either bank.

All rivers found to be eligible for inclusion in the National Wild & Scenic Rivers System must follow the management direction that specifies that “management and development of the identified river and its corridor should provide for the protection of its free-flowing characteristics, to the extent authorized under law, as well as those outstandingly remarkable

values which contribute to its eligibility” (LRMP p S-5). We expect an analysis of how the project will be consistent with Wild and Scenic River proposals and their outstandingly remarkable values.

10. Wildlife

There are numerous wildlife species in the project area that need careful management of their habitat (see NW Forest Plan). We highlight a few of the most significant issues.

Spotted Owl

The Forest Service has an obligation to provide for listed species, including the Northern Spotted Owl. The plan goal is to improve habitat conditions, but the proposed activities may, in fact, reduce available habitat and potential future viability of the owl in this area. The future conditions of the forest, including the extent of impacts from climate change, are as yet unclear. It is likely that the NSO will have a challenging time overcoming not only impacts to their habitat due to climate change, but will also need to withstand incursions into their range from barred owls. A reduction in available, protected habitat through timber activities is not appropriate given these challenges, and a more conservative approach is needed. As noted in Topic #2, the extent of “treatments” proposed is extensive, and will degrade spotted owl habitat. This high risk strategy is not appropriate for a species in such precarious situation on the Okanogan-Wenatchee National Forest.

Security Habitat

Security habitat is also critical for wolves, grizzly bears, fisher, lynx and wolverines. While we are pleased to see the depicted increase in Wolf and Grizzly Bear Core Areas post-treatment, it needs to be much larger. This also assumes that all the proposed road closures suggested by the draft EA are carried out, which is not guaranteed in the plan. As discussed previously, removing roads is a first step, and the Forest must then keep these closed roads free of ORV or ATV usage, and should not allow them to default to motorized trails. Security habitat for all these species is reliant on the commitment of the Forest to provide non-motorized areas for wildlife.

Wolverines

Wolverines are a native species that were extirpated in this state early in the 20th century, but are now recolonizing the Cascades. While the USFWS has refused to list the species, its low populations are of grave concern, and the Forest Service needs to make every effort to recover this species by maintaining and restoring denning, foraging, and dispersal habitat.

We know that wolverines are wide ranging and tend to move in direct lines, rather than going around ridges. Forest Service tracking data supports these patterns. If we are to recover the wolverine, it is important that we provide both foraging habitat in the Chiwawa valley, as well as opportunities to disperse through the valley--not just at higher elevations. While wolverines may be more common above 4,500', they frequently use habitat below 4,500'. Their recolonization of the Cascades extends south to Mt. Rainier, which would require that they go at least as low as 3,000' to traverse Snoqualmie Pass, and in this part of the Cascades their habitat extends as low as 2,500'. A mapping exercise by the Sierra Club in 2013 shows significant spring snow cover that would support wolverine use far below the 4,500' which is the focus of the EA. The EA should include this zone in maps and should include specific

direction to provide adequate protection for this species. The Forest Service should also identify areas with potential for denning sites and establish an adequate buffer to protect these sites from logging or winter/spring motorized access.

While the lower elevations of the valley are used less by for wolverines, they are part of the solution. If we recover to a robust population, then we will see more wolverines at the margins of the preferred habitat, and we should manage towards that goal. And in the area north of Fish Lake, we need to have large zones of connectivity, despite the lower elevation in the valley bottom. They are certainly snow-covered in winter.

Proposed treatments above 4,500' (Fig. 3.4-10) has us greatly concerned. What does this mean? What treatments are being proposed in late-successional forest at that elevation (see Table 3.4-10)? Why are there proposals to do "stand regeneration treatments". Isn't this just a euphemism for clearcutting?

It is encouraging to hear that the plan is to increase security habitat in areas near the Glacier Peak and Mad River roadless areas by decommissioning roads. This commitment needs to be firm, explicit and shown on maps. That should also include the Nason Ridge roadless area and adjacent lands. The upper Meadow Creek corridor between two lobes of the Glacier Peak Roadless Area should have security habitat improved by removing the roads (e.g., 6300 & 6309). There is a similar situation in the Upper Brush Creek 6306 road system.

11. Other Concerns

Old Growth

We would like clarification as to why the Old Growth and/or unroaded area on the south shore of Lake Wenatchee is scheduled for thinning from 20-50% of canopy cover. This area has not had any previous timber activity, and the area is shown as within its historical range of fire regime (Vegetation Condition Class 1B).

Human Caused Fire

We would like clarification as to what the Forest is proposing to do to manage and prevent human-caused fires. According to the draft EA, 60% of fires within the forest are caused by lightning strikes, and 40% of fires as caused by "various human causes" (Figure 3.3-2). According to that figure, there are 2 human "cause classes" that together ignite 30% of the total fires in the forest: Cause class 4 (961 starts) and class 9 (395 starts). What are these cause classes? If there are controllable human behaviors that can reduce the potential for fires within the Forest, this Pilot Project should address these behaviors. Reducing risks for wildland fire must start with reducing ignitions, particularly as climate change increases the risk of fire. Public access, including access via ATVs, must be managed to prevent an increase in fire risk.

Fuel Breaks

Fuel breaks may provide added firefighting capability, but they come with high impact. Besides introducing major changes in forest structure and connectivity, they bring additional motorized access to security habitat. Fuel breaks must not become defacto roadways for ORVs and ATVs, or routes for snowmobiles during winter months. It is unclear from the map (2.2-3) which fuel breaks currently exist and which are proposed. Apparently, the

Community Protection Line exists, but is undefined. Is it a shaded fuel break as defined in the text? What is the scope of the “Community” to be protected? Are there other fuel breaks in the project area? When were they constructed and what is their condition?

12. Vegetation Management

Use of Herbicides & Pesticides

What herbicides/pesticides are proposed to be used in the Upper Wenatchee Pilot Project in the next year, five years, ten years? A DEIS should address any proposed use of herbicides/pesticides. This should include:

- Identification of all proposed herbicides/pesticides by chemical and trade name
- Estimated yearly quantifies of herbicides/pesticides proposed for use
- Mitigation steps that would be taken to keep herbicides/pesticides out of water bodies
- Steps that would be taken to warn the public if herbicides/pesticides are used

13. Public Involvement

The public has had very limited time to review this complex document and proposal. We appreciate the meeting we had with the District Ranger and staff to discuss our concerns. However, we would ask that the Forest provide access to their staff in the upcoming months as we continue to review the project document. We recognize that the Forest has had (and will continue to have) interaction with the North Central Washington Forest Health Collaborative regarding this project, but this collaborative does not represent all forest users, and it is not a substitute for actively engaging others in the public process.

In conclusion, this project is of a scale that requires an EIS. We oppose the implementation of Alternative 1 for this project primarily due to the impacts to LSRs, roadless areas and NSO habitat. The No Action Alternative is also clearly not an acceptable option. Alternative 2 still has significant issues, as we have noted above, and so should not be selected as drafted. We hope that our concerns can be addressed and resolved, and that an improved project can move forward to provide the needed habitat protection and restoration, that would contribute to the ecological resilience in these watersheds.

We appreciate the opportunity to comment on this significant project. Please keep us on the mailing list and informed of future activities and developments.

Sincerely,

Nete Olsen
National Forest Committee
Washington State Chapter
Sierra Club

