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Comments: I am writing to ask you to deny the approval of the current Mission Ridge Expansion Plan based on conditions around wildfire risk, lack of triggers for access to private land across National Forest, and concerns about overuse of USFS land and degradation of ADMWD areas.

1. Proposed Road across USFS land to access the private development - No trigger to allow Right of Way (ROW) Page 12 of the Draft Environmental Analysis discusses Forest Service Policy FSM2700 which guides the Forest Service in determining when to grant rights-of-ways across National Forest Land. The policy indicates that access should be granted when there is currently no access to the private property and when it is not possible to gain access across non-federal land.

There are existing roads that access the development property on section 19 from adjacent sections 18 and 20, neither of which are federally owned. Therefore, the trigger condition that would advise the USFS to allow access to private land across National Forest is not met. The USFS needs to provide a clear and defensible justification for allowing this road. If such justification cannot be provided, the USFS should not grant right-of-way (ROW) and instead should require the use of alternative roads that do not cross lands managed by the USFS.

2. Fire - Insufficient Safety Zones for Responding Agencies and Danger to Populations in area

Given the location of the proposed development, any fire response will be multi jurisdictional in nature.

Responding agencies will include local rural fire departments, the Washington Department of Natural Resources (DNR), and the US Forest Service (USFS). Considerations for escape routes include fuel type and density, topography including slope steepness and orientation, chimneys, box or narrow canyons, number of routes, and travel time to Safety Zones. Safety zones will be of a size and nature to protect all firefighters in a worst case scenario. For a minimal fire response crew (one engine) to be safe in the Mission Ridge Parking lot, with an upslope wind of 10 mph and 100 foot flame lengths, USFS standards require a Safety Zone over twice the size of the existing parking lot. Additionally any fire response will have to drive over 5 miles on a narrow canyon road with slope angles exceeding 20% most of the way to escape. The Squilchuck drainage has already been designated a high fire risk area. The Forest Service should take into account the role it will play permitting infrastructure that will someday place firefighters and future residents in a potentially compromised safety situation.

3. Overuse Does Not Currently Exist - Overuse Will Develop with Plan Implementation

On page 11 of the EA, under "Regulatory Framework: Management Direction and Guidance", The Wenatchee National Forest Land and Resource Management Plan (FLRMP) states: "New recreation sites should be constructed where demand is high and overuse problems are occurring at existing sites."

In addition On page 12 of the EA, under Northwest Forest Plan, Administratively Withdrawn Areas (ADMWD) are discussed. ADMWD areas are designated both south of the proposed development, and west of the proposed development. These areas have been previously identified by the Forest as valuable for recreation, visual, and backcountry use. The proposed plan will degrade the value of all three of the stated values in both of the ADMWD areas.

In addition we are very concerned about the effects that this development will have on traffic, wetlands and wildlife. We ask that the developer resubmit a plan that is within the Forest Service policies, Fire Codes, and be less destructive to the environment and quality of recreational opportunities.

Thank you for the opportunity to comment.