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Organization:

Title:

Comments: 2/11/2021

RE: Upper Wenatchee Pilot Project

To Whom It May Concern:

I respectfully submit my comment per the legal opportunity to comment regarding the Upper Wenatchee Pilot Program with Proposed Northwest Forest Plan Amendment for the Okanogan-Wenatchee National Forest in the Wenatchee Ranger District.

Regarding Lack of Schedule and Boundary:

I have great concern over the lack of a general schedule and the boundaries with which the Project is to take place. As cited on page 14 of the EA, "map boundaries and acres may be adjusted as additional fieldwork is completed and information is improved and updated". We need exact boundaries in order to be able to provide an educated and definitive comment of support or opposition. Further, on page 49 it goes on to read that "not all roads have been surveyed for this project... additional barriers may be identified during implementation". If additional roads are going to be put up for consideration we need to be permitted to submit public comment for those additional routes.

The lack of an apparent schedule is also disturbing. Once again, in order to submit an educated and definitive comment, the public needs to know when broad activities are slotted to take place and how long the anticipated recovery and clean-up times are.

Regarding Riparian Restoration:

In the Environmental Assessment (EA) there are several statements that concern me and the solidity and validity of the claims the report makes. On page 20, it cites that there are "potential road-related barriers to aquatic organism passage" and that "may be due to road-related barriers". Further, on page 167 it states that "the distribution of species throughout the Project planning area and the importance of different habitat is not well known". Additionally, on page 51 it makes mention that there are multiple unsurveyed reaches which makes it impossible to be certain whether they are indeed at risk or in poor condition. I am in favor of riparian restoration, but without concrete evidence that closing roads will improve spawning and rearing habitat, I am not in favor of closing or decommissioning roads, trails, or dispersed sites.

According to page 216 and the "standard guidelines for Riparian Reserves", "adjustment measures" need to be attempted before closure is considered. I'm in favor of creating byways for fish to successfully move upstream and for us to hopefully recover Columbia River Chinook salmon, steelhead, and bull trout by remedying barriers to fish passage whether that's through replacement or modification, but not through decommissioning, closing, or relocating roads, routes, or dispersed sites.

If fish passage can be improved through remediation/improvement to campsites, roads, and motorcycle and mountain bike trails I would highly encourage this option. I would advocate for proper bridges over sensitive waterways and wetlands, as well as some sort of natural solution to aid in keeping sediment from entering the waterways. I would advocate for riparian habitat to have large woody debris placed, culverts replaced/repaired.

I was pleased to see on page 56 that Best Management Practices are being encouraged. With concerns of

sediment delivery to waterways, I am perplexed at why logging operations are permitted to cross streams so long as it is "minimal". Minimal is subjective and not enforceable. If we are to provide new solutions for recreationists, logging operations should also be forced to provide new solutions.

#### Regarding Terrestrial Treatments:

In the EA on pages 21-22 it cites the need to "create and maintain successional pathways that provide the amount and spatial arrangement of forest conditions that increase resilience to natural disturbance and sustainability... improve habitat conditions within LSRs while reducing risk of stand-replacing fires... maintain, enhance, or accelerate the development of large and old trees and increase proportion of old forest structure... support biodiversity by restoring, enhancing, and/or maintaining unique habitats including aspen, white bark pine, meadows, and huckleberry fields... reduce impacts from fire and return fire as a natural element of the landscape" - I agree that we need to try for these objectives but with the following concerns and disagreements:

1. Roads do not need to be closed, decommissioned, or relocated in order to achieve the above objectives.
2. I am not in favor of any terrestrial treatments that negatively impact big game winter range habitat or support the expansion of the "core areas" for gray wolves and grizzly bears.
3. I am not in favor of any thinning in the areas that contain trailheads unless access to connecting trails can be achieved via another route. Motorized trail access is severely limited in the OWNF and loss of access is unacceptable for any period of time.
4. I am not in favor of thinning if it will result in needing to close any of the developed campgrounds during camping season. The area is heavily used and loss of access during peak season or for an extended amount of time is unacceptable.
5. I am not in favor of any thinning that would close or limit sno-park access, winter hiking trailhead and trail access, or snowmobile trails on designated roads. This is a popular winter recreation area and any loss of access is unacceptable.

#### Regarding Dispersed Recreation:

On page 241 of the EA it refers to the Wenatchee Forest Plan (WFP), which plainly states that the regulatory framework as it applies to roads as is follows: "...to maintain the current pattern of dispersed recreation." By eliminating dispersed camping through road closures, there will be a much smaller and less diverse recreation opportunity which goes against the WFP.

I am firmly against the 65 miles of road identified for decommissioning by the TAP, and against the 14 miles of road to be closed. I'm firmly against all of the "changes to road management levels" (as read on page 52 of the EA) and the possible deletion or relocation of any trails. I'm firmly against the removal or relocation of campsites, dispersed or with infrastructure. I would be in favor remedying dispersed sites, campgrounds, roads and trails, but not relocating them.

Many of the dispersed sites in the Project area are well-developed and provide camping opportunity as many of the campgrounds are routinely full during the peak season. I would be in favor of means to discourage new dispersed sites from being created, but am in favor of the existing dispersed sites to remain.

#### Regarding Recreation At Large:

Recreationists come in all forms: water enthusiasts, hunters, gatherers, motorized users, campers, and hikers to name a few.

In the EA on page 17, it indicates that the Lower Chiwawa River is a "Recreational River". It states that we are to

"preserve the recreational river characteristics of the river and surrounding area". The Lower Chiwawa River is not designated a Scenic and Wild River to date. To "discourage" access to waterways and waterbodies where some choose to recreate is not an acceptable solution to riparian restoration.

I am not in favor of closing or decommissioning road densities as it takes away from a multitude of recreational opportunities in an already busy area of the OWNF. By not allowing for dispersal with varying road options and varying camp options, the limited options are not acceptable for the number of recreationists. There was an expressed concern over the lack of non-motorized-high probability of isolation areas. Ironically, by closing or decommissioning roads, this opportunity to get further from the campground and spaced out from other individuals actually decreases.

I'm in favor of keeping the following options open, accessible, and without relocation:

1. The well-used dispersed sites in the Project area: Alder Creek Horse Camp, Deer Camp, Deep Creek Campground, Swallow Caves area, Meadow Creek Pit and Triangle sites, Lil Creepo and Big Creepo.
2. All trails and trailheads in the Project area.
3. The four campgrounds in the Project area: Glacier View, Goose Creek, Meadow Creek, Grouse Creek.
4. The two designated sno-parks: Chiwawa Sno-Park and Fish Lake Sno-Park.

As a side note: I'm in favor of improving existing road and trail conditions through maintenance actions. It would be beneficial for the OWNF to seek partnerships with motorized organizations to educate users on their impact and undertake some of these maintenance endeavors. In addition, I would also advocate for new motorized opportunities to be made available elsewhere in the OWNF. With ever-more recreationists visiting the forest, areas are becoming crowded and the need for all users to have reasonable access is necessary.

Regarding Socioeconomic Concerns:

The beauty of our public lands is that they are accessible for all - it doesn't matter if you're rich or poor. In Chelan County, those living below the poverty level is at 12%; state-wide that statistic is at 11%. By eliminating dispersed recreation opportunities and leaving predominately pay-to-camp options, the Project is discriminating against those less financially fortunate.

The decommissioning and road closures would also have a negative impact on tourism in the area. Dispersed opportunities would be hindered, folks would be crowded together, and the experience would not be as enjoyable.

Motorized access is often the only means of recreation for those with disabilities. To eliminate roads through closure or decommission, the Project would be discriminating and limiting access to those who are not fortunate enough to be able to participate in physical activity.

In sum, I appreciate the opportunity to comment on the Upper Wenatchee Pilot Program and look forward to a collaborative effort to come up with a solution that addresses the needs and concerns from all parties with interests at stake.