Data Submitted (UTC 11): 10/23/2023 10:53:43 PM
First name: Elizabeth
Last name: Steele
Organization:
Title:
Comments: My comments are based largely on what I've observed in other Wenatchee River Ranger District projects over the past 20 years. Since I often hike/bike into the Forest, I've seen treatment activities and consequences - from the Fischer fire salvage, Canyons and Chumley/Stew projects that were initiated more than 10 to 15 years ago. At that time, I was an active member of the Chumstick Stewardship Coalition and contributed to review and comment on project alternatives, mainly concerning big tree/ legacy forest, contiguous habitat and forest roads. That collaborative scoping was far different from this current one, with its emergency authorization limiting opportunity to comment on the District's 42,000 acre portion. And the agency will be offering only its proposed action; no alternatives. In addition, the Oct. 4 meeting took place more than a week after the month-long scoping period began - further constraining public input.

The following are topics of concern:

The landscape analysis maps have few identifying features. Where are the forest road numbers and topographics? At least one scoping map should include those; otherwise, they are confusing for anyone trying to determine possible actions in specific locales.
Much of the work seems based on aerial photos taken in 2014. They need to be updated, along with "ground-truthing" prior to any treatment.

The emphasis on fuel breaks. Under this proposal they are "High Level Prioritization" and "provide tactical advantage for fire operations". (Sounds more like military strategy than managing a very complex living forest system.) The 115,000 acre landscape would be divided into PODs surrounded by PCLs, DFPZs which can be 100 to 1,000 yards wide. Although firefighter safety and ease of access is certainly important, this Potential Operational Delineation strategy could also do a lot of natural resource damage. In The Role of Shaded Fuel Breaks…Eastern Washington, by Hersey and Barros, fuels breaks, according to critics, "have little ecological value while potentially leading to negative ecosystem impacts." The 2022 paper also notes that "stand alone fuel breaks are unlikely to stop fire spread." And with so many throughout the landscape (as planned), they could contribute to erosion, sedimentation, noxious fire prone weeds, fragmentation and disruption of contiguous habitat corridors. In addition, costly regular maintenance would be required to serve the purpose originally intended. Plus, they would open up even more areas to motorized "recreation", which, in itself, is damaging to natural resources, a serious fire hazard and wildlife disruptor.

Prescribed burns in Spring can have localized impact on wildlife. A burn in spring does not mimic "natural fire regime" and, instead, displaces
bird populations as they're returning to nest and a whole retinue of other species. And with ever more finicky weather and winds, a prescription - at any time - can get out of control. (Witness the prescribed burn several miles up Van Creek that ended up killing many more trees than intended. That's true also of the slow-burning Eagle Fire that resulted in well over 10 percent of even large, healthy, supposedly fire resistant, trees' death over the five years after the fire. (Personal observation and from trained conservation biologists.)

Roads - Improving road conditions, where roads serve as Potential Control Lines, is very open-ended. Although the plan says "no new roads", that does not preclude re-opening old relic roads. In my experience in the Eagle Creek area, the Canyons and Chumley projects were irresponsible about closing roads that were re-opened for forest treatment. Although some were gated (with no locks), some bermed, that's no deterrent to determined ORV, ATV, "razers", dirt bike enthusiasts - a recreation that's exploded over the past 10 years with, it seems, zero enforcement except when there's an accident. (The 24,000 acre Fischer Fire, by the way, was started by a

wrecked dirt bike.)
I note that not one word in this landscape plan mentions the fire danger these vehicles, and the people on them, pose and the need to address their ever-growing presence, noise and the damage they cause to both roads and illegal off-roads. These motorized hazards should be equated with other, officially recognized, fire threats and their access controlled, especially during high fire season.

Thinning to 20 to 30 percent canopy cover. Is of particular concern in older big tree legacy forest on the north-facing slopes where the trees, soil and groundcover are moist, cool and protected under higher canopy cover. In some studies, once the canopy is thinned to this extent, temperatures increase to the detriment of understory habitat, regrowth of seedlings; and the remaining trees are more vulnerable to wind and drying soil. In some areas, it speeds up the landscape conversion to drought tolerant shrub and could create conditions where fire prone undergrowth starts to dominate.

According to plan documents, in the central/eastern portion and in the '04 Fischer Fire perimeter, there's "low fire risk" due to "reduced fuels from past treatments, harvesting and fire effects." * Much of that is adjacent to moist, cool, dense old forest in the Eagle Creek region. Yet, it is also "high priority" for treatment, despite being considered a "relatively minor component of the planning area" with 5,000 to 10,000 acres (an oddly broad range….). The contradictory rationale seems to be based on 3 metrics used by DNR in its landscape analysis: 1. drought vulnerability (low in north-facing, cold, moist old big tree forest) 2. overabundant forest structure (it is labeled 'desired or 'upper end' range - a subjective, rather arbitrary designation? What is it based upon?) and 3. wildfire transmission to homes. (20 years ago, Eagle Creek Road had about a quarter of the structures that are here now, many of which have been permitted by the county in vulnerable areas.)
Post-treatment, according to DNR, 40 percent of the moist, cold old forest will be thinned in "sustainable' locations, primarily north-facing slopes and valley bottoms," if our Forest Service adopts the DNR's recommendations. And "thinning" projects on these slopes could include bulldozing old roads, commercial logging, "regeneration" cuts, multi-year industrialization.

I object to this strategy based on questionable assumptions as we confront the climate crisis and too many socio-ecological trade-offs. Are we really doing the "right thing" by invading an uncommon forest type, with rare plants and wildlife, in the "hope" that it may stave off wildfire? Strong, unpredictable winds, sunlight to the forest floor, drying the forest, collateral human usage…These consequences could result in more long-term decline than no action in this forest type. *emphasize the defensible space that, according to your analysis, already exists in the Eagle Creek area.

Estimates of lumber board footage - marketable timber and smaller diameter logs that could be removed via commercial contracts - should be included in analysis.

Thank you for the opportunity to comment on this ambitious project. I hope that whatever is ultimately decided recognizes the cumulative impact of private and public decisions.