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Comments: As a scientist and member of the International Association of Bear Management and Research Association, I am writing on the proposed Eagle Creek Project (#68983) in the Okanogan-Wenatchee National Forest. According to the Forest Service project summary, this proposal would implement commercial and non-commercial thinning, fuel treatments, forest vegetation "improvements," road maintenance, and green timber sales northwest of Leavenworth, with stated purposes of reducing wildfire risk, improving forest structure, and enhancing wildlife habitat.

I support the goal of making forests and nearby communities more resilient to wildfire and climate change. However, based on current fire-ecology, climate, and wildlife science, I have very serious concerns that the proposed actions, especially commercial thinning and associated road activities, may not achieve those goals and could instead increase ecological risk.

1. Wildfire risk and treatment effectiveness

Recent fire-science literature clearly shows that thinning can reduce crown fire potential under some conditions, but it can also increase wind penetration, dry surface fuels, and in some cases facilitate faster fire spread, particularly under extreme fire-weather conditions. If commercial thinning leaves substantial slash or fails to include robust surface-fuel treatment and long-term maintenance, the net effect on fire behavior can be neutral or even negative.

I request that the Environmental Assessment:

Explicitly model fire behavior under extreme fire-weather scenarios, not just average conditions.

Demonstrate that all thinning units will include effective surface-fuel treatments and a realistic plan for ongoing maintenance over the life of the project.

Compare commercial thinning to non-commercial and low-impact alternatives, including prescribed fire and, where appropriate, managed wildfire.

2. Protection of large, old, and fire-resilient trees

Large, old, fire-adapted trees are critical for forest resilience, biodiversity, and carbon storage in dry east-slope Cascades forests. Even when projects state that they will "retain large trees," diameter limits and marking guidelines can still allow removal of ecologically important individuals, especially in stands already altered by past logging.

I request that the EA:

Establish clear, enforceable large-tree retention standards, with a strong presumption against removal of old, fire-resilient trees except for genuine safety reasons.

Map and protect existing old-forest and large-tree patches as ecological anchors and climate refugia.

Analyze how proposed treatments will affect stand structural diversity, not just average basal area or tree density.

3. Wildlife habitat and connectivity

Many wildlife species depend on dense canopy cover, snags, downed wood, and interior forest conditions. Thinning and road-related activities unacceptably fragment habitat, increase edge effects, and reduce the availability of key structural elements.

I request that the EA:

Identify species of concern that rely on closed-canopy or structurally complex habitat, and analyze how treatments will affect them at both stand and landscape scales.

Include strong snag and coarse-woody-debris retention standards that are binding and measurable.

Ensure that there are no-treatment or light-treatment refugia to maintain interior habitat and connectivity across the project area.

Analyze and demonstrate that any road or roadway will not fragment habitats.

4. Roads, hydrology, and sediment

Roads are a major source of sediment, habitat fragmentation, and chronic disturbance. While the project lists "road maintenance" as an activity, it is not clear whether the analysis will consider opportunities to reduce road density.

I request that the EA:

Evaluate current road density in relation to watershed health and wildlife needs, and consider road decommissioning or conversion to non-motorized use as a core alternative.

Analyze sediment and hydrologic impacts under future climate scenarios, including more intense storms and rain-on-snow events.

Commit to specific, measurable road-improvement and decommissioning actions where roads are clearly degrading streams or aquatic habitat.

5. Climate change and carbon accounting

Given the accelerating climate crisis, it is essential that the Eagle Creek Project include transparent, science-based carbon accounting. Logging and thinning remove live biomass and reduce on-site carbon stocks for decades, while the probability that any given treated stand will experience a high-severity fire during the treatment's effective window is often low.

I request that the EA:

Quantify carbon losses from logging and fuel treatments, including foregone sequestration, and compare them to realistic estimates of avoided fire emissions based on fire probability.

Treat large, old trees as irreplaceable carbon and resilience assets, with strong protections against removal.

Explain how the project aligns with broader climate-mitigation and adaptation goals at the forest and regional scale.

6. NEPA alternatives and best available science

Finally, NEPA requires a hard look at environmental consequences and a robust range of alternatives. Because this project is proceeding under an Environmental Assessment with an expedited timeline, it is especially important that the Forest Service demonstrate the use of best available science and consider less-intensive, non-commercial alternatives that could meet safety and resilience goals with lower ecological cost.

I request that the agency:

Develop at least one alternative that excludes commercial logging, focuses on prescribed fire and minimal mechanical treatment, and emphasizes road reduction and habitat protection.

Explicitly cite and engage with recent peer-reviewed literature on fire behavior, climate change, wildlife habitat, and carbon, rather than relying solely on older or internal models.

Include a clear monitoring and adaptive-management plan with measurable indicators and triggers for adjusting management if outcomes diverge from predictions.

I urge and expect the Forest Service to ground its decisions in the best available science, prioritize protection of large, old, and climate-resilient forests, and fully evaluate alternatives that reduce wildfire risk without sacrificing long-term ecological integrity, and not allow habitats to become fragmented.