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<https://cara.fs2c.usda.gov/Public/CommentInput?project=413577>

RE: O-WNF Entiat-Chelan Ranger District draft EA and Preliminary FONSI for the Lower North Shore Landscape Restoration Project

The following are comments on the above-mentioned draft EA (DEA) and preliminary FONSI.

GENERAL COMMENTS

Project Description. According to the DEA, “the 30,167.6-acre project area is located on the Chelan Ranger District, on the north side of Lake Chelan. The project proposes to mimic natural disturbance on the landscape using prescribed fire to reduce the risk of uncharacteristic wildfires, increase health and resilience of vegetation and improve wildlife habitat.” (Page EA-4) This is incorrect and deceptive. Please delete this sentence.

On page EA-4 it states, “Non-commercial tree thinning, biomass removal, prescribed broadcast burning, and pile burning would be used as treatment methods. . .” This page also states, “Non-commercial, small diameter thinning (less than 11 inches diameter at breast height) would occur by machine and or hand/chainsaw on approximately 21,095.9 acres.” Non-commercial logging is proposed for approximately two-thirds of the project area. The O-WNF cannot summarize the proposed project as only “using prescribed fire” when non-commercial tree thinning is also proposed.

This page also mentions “connected actions (road maintenance, haul routes, and temporary roads).” Although “biomass removal” is mentioned twice on page EA-4, there is no apparent description or definition of “biomass removal” or how such removal is connected to the construction of additional roads given that non-commercial logging is proposed for approximately two-thirds of the project area. How many miles of additional roads would be constructed due to “biomass removal?”

Additional road construction would not be necessary if the proposed project was limited to using prescribed fire. Given the potentially significant adverse effects from non-commercial logging over a majority of the project site, together with road construction, with attempts to use prescribed fire, a draft Environmental Impact Statement must be prepared.

The DEA is deceptive in its description of the proposed project. The DEA is titled: *the Lower North Shore Landscape Restoration Project*. However, as shown in Table 1 (page EA-4), approximately two-thirds of the project area would receive non-commercial thinning treatment. A USDA Forest Service webpage describes “thinning” as:

“Mechanical thinning of forests is a multifaceted process and often involves piling brush, pruning branches and creating fuel breaks.”

<https://www.fs.usda.gov/about-agency/features/thinning-forest-trees>

Nowhere in the draft EA is logging mentioned. Why is the O-WNF hiding non-commercial logging under the guise of “thinning” approximately two-thirds of the entire project site over the life of the proposed project?

The DEA is fundamentally dishonest as it uses the euphemism of “thinning” 38 times. The term “logging” does not appear once in the draft EA. Apparently, little has changed since February 15, 1990, when Donald F. Rotell, District Ranger, Naches Ranger District, Wenatchee National Forest, issued a solicitation letter for public input “concerning the Timber Stand Improvement program for Fiscal Year 1991.” (Ref: 2410/2470). This letter stated:

This program consists of activities/treatments in unmanaged timber stands and previously harvested areas where the average tree is less than 7 inches in diameter. Excess trees, diseased and damaged trees are removed in order to concentrate growth on the faster growing, healthier trees. *This compares to the common practice of thinning carrots in a vegetable garden.* [emphasis added]

This at least is an open and honest admission of how the U.S. Forest Service views forest management.

- Why does the O-WNF insist on using the term “thinning” and avoid using the term “logging?”
- Please use the term “logging” instead of “thinning” in future DEA documents.
- Please include the following in your final documents:
 - “Vegetation management” compares to the common practice of thinning carrots in a vegetable garden.

Alternatives. The DEA and FONSI fail to comply with the National Environmental Policy Act and must be withdrawn. The National Environmental Policy Act requires that:

consistent with the provisions of this chapter. . . , include in every recommendation or report on proposals for legislation and other major Federal actions significantly affecting the quality of the human environment, a detailed statement by the responsible official on –

(iii) a reasonable range of alternatives to the proposed agency action, including an analysis of any negative environmental impacts of not implementing the proposed agency action in the case of a no action alternative, that are technically and economically feasible, and meet the purpose and need of the proposal;
(42 U.S.C. §4332(C)). [emphasis added]

In addition, as posted on the current USFS website under *Forest Service NEPA Procedures and Guidance*:

11. **Consider the alternatives** analyzed in environmental document(s) before rendering a decision on the proposal (36 CFR 220.4(c)) [emphasis added]

<https://www.fs.usda.gov/about-agency/regulations-policies/nepa/nepa-procedures-and-guidance>

Rather than complying with NEPA, the O-WNF has failed to include a range of alternatives (other than a no-action alternative), such as prescribed burning only or fewer road construction miles, in the DEA. The O-WNF has presented a take-it or leave-it project that fails to offer decisionmakers or the public any choices on the proposed project. The proposed project would significantly affect the quality of the human environment. The O-WNF has failed to comply with NEPA. This DEA must be withdrawn until an EIS with a reasonable range of alternatives is provided .

The findings of no significant impact (FONSI) (DEA, pp. FONSI-1 and 2) are incorrect. This is “disturbing” as the activities proposed by the O-WNF would have significant adverse environmental impacts. The O-WNF must issue a Finding of Significance (FOS).

Cumulative Impacts. The DEA fails to address cumulative impacts, which is critical for a project covering 30,167.6 acres, and fails to address or mention similar activities on adjacent acreage. The DEA makes only one general mentions of cumulative effects (page DEA-9):

Cumulative effects are considered at the watershed scale, accounting for past, present, and reasonably foreseeable future actions that could interact with the proposed treatments. Temporal boundaries include short-term effects during implementation (1–5 years) and long-term effects on forest structure, fire regimes, and habitat conditions (up to 20 years). The analysis considers potential impacts to vegetation, wildlife, soil, water, air quality, cultural resources, and social/economic values, consistent with NEPA requirements.

The failure to provide specific information on cumulative impacts is unacceptable and another reason an EIS must be prepared to address cumulative impacts in a systematic and quantitative presentation.

Monitoring. The entire DEA is inadequate as it lacks a specific monitoring program that the public can review in advance. The DEA contains no specific sections on “monitoring” or “mitigation conditions.” Rather, the only mention of monitoring in the DEA is:

Decision criteria for reforestation include:

- Burn severity classified as high or moderate by post-fire monitoring (Page DEA-5)

Monitoring of Forest Service projects is a requirement of the Northwest Forest Plan (NWFP), in which the Standards & Guidelines specify:

“Monitoring is an essential component of natural resource management because it provides information on the relative success of management strategies. The implementation of these standards and guidelines will be monitored to ensure that management actions are meeting the objectives of the prescribed standards and guidelines, and that they comply with laws and management policy. Monitoring will provide information to determine if the standards and guidelines are being followed (implementation monitoring), verify if they are achieving the desired results (effectiveness monitoring), and determine if underlying assumptions are sound (validation monitoring)” (NWFP, S&G).

Appendix B, Project Design Criteria contains generic statements on monitoring. For example: “Areas disturbed by heavy equipment and pile burning should be monitored for invasive plant invasion for 5 years.” (Appendix B, page 15).

- Such weasel words should be replaced by “must be monitored,” as should be monitored remains discretionary.

Impact monitoring, followed by appropriate corrective measures, is an appropriate type of NEPA and Forest Service mitigation. The proper remedy is to monitor the operation and to halt operations in the event of noncompliance. See: *Forest Service Manual 2000 - National Forest Resource Management*,

Chapter 2040 - National Forest System Monitoring. However, without monitoring or reporting requirements to the public, the public has no confidence that the Forest Service would monitor or report any significant adverse environmental impacts from the proposed project.

- A monitoring plan must be included that clearly describes how monitoring will take place, what will be measured and tracked, and how the Forest Service will apply adaptative management to study the cumulative impacts of the project, and how this information would be provided to public. This would describe when, why, and how the Forest Service will make changes to future phases of the project as a result of such monitoring, as well as opportunities for public review and comments.

Involvement of the Public. The DEA fails to disclose ANY public meetings or hearings that were held during the development of the DEA.

- Please document all public meetings or hearings that have been held on this project.

The O-WNF has previously embarked on a number of “restoration,” fuel break,” “prescribed fire” Landscape Analysis,” “Vegetation Management,” and “Vegetation Projects such as:

Chumstick to LP Project
Eagle Creek Project
Lower Lake Cle Elum Fuel Break Project
Midnight Restoration
South Fork Tieton Prescribed Fire Project
Wildfire Crisis Strategy Project
Upper Methow
Upper Swauk Restoration Project
Fuels & Forest Health EAD Project

- Please describe and quantify the success of such past projects.
- Please describe how the O-WNF has responded to public comment and concerns or modified the above projects due to public comments or concerns.

Comment deadline. The O-WNF has set a 15-day comment deadline. This is unacceptable. The DEA and Appendixes took far longer than two weeks to prepare. It is unacceptable to expect detailed public comments to be prepared in only two weeks. This is a request to extend the comment deadline.

More specific comments are as follows:

COMMENT: The DEA makes no mention of board feet.

- How does the O-WNF calculate log volume?
- What is the projected annual board feet proposed to be logged on the O-WNF over the life of this project?
- What is the estimated board feet of non-commercial timber that would be removed from the project area during the life of the project?

COMMENT: The DEA – Appendix C, Fire and Fuels Report, page 2 states, “Air quality was not fully analyzed due to a lack of fuel loading information available” and “On April 3, 2025, Chelan County commissioners signed an updated Community Wildfire Protection Plan which included expanding the definition and area considered as wildland-urban interface. At the time of analysis, the GIS layer was not available to the Forest Service.”

DEA-page 4 states: Other than two brief mentions in Table 7, there does not appear to be any other mention of hydrology, and no Hydrology Report is provided. Why is there no Hydrology Report?

By its own admission the DEA cannot provide decisionmakers or the public with adequate information to determine reasonably foreseeable environmental impacts or that no significant adverse impacts will occur over the timespan of the proposed project.

COMMENT: DEA-page 2 also states:

The Wenatchee National Forest Land and Resource Management Plan (“forest plan,” USDA 1990), as amended by the Northwest Forest Plan and its subsequent January 2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (“Northwest Forest Plan” or “NWFP,” USDA and USDI 1994) are land management documents which provide broad management direction for the Lower North Shore planning area.

All the above documents and plans are a quarter of a century old.

- Why have these documents and plans not been updated?

COMMENT: The DEA and Appendixes do not describe the project area’s Transportation System.

- How many miles of unauthorized roads are located within the W-ONF? How many within the proposed project area?
- How and by whom were these unauthorized roads constructed?
- How many miles of existing roads would be restored to natural conditions under this proposal?
- How many additional miles of roads would be constructed over the life span of this project?

Page EA-8 states: “The Cooper Ridge fuel break project is a mechanical thinning project less than 3,000 acres following linear features along the project area boundary. . .”

Fire breaks create unwanted motorized vehicle access points. Does the O-WNF intend to open this fire break to motorized vehicles? This is yet another reason that an EIS must be prepared.

COMMENT:

- What methodology did the Forest Service use to map mature and ancient forests at fine spatial scales?

COMMENT: Rain on Snow (ROS): Project activities have the potential to change ROS processes, as canopy cover may be reduced in thinned stands.

- Did the W-ONF use the Aggregate Recovery Percentage (ARP) model from the Mt. Hood National Forest to look at potential rain and snow processes?
- For example, does logging on south facing slopes contribute to early spring snow melt and runoff, with adverse impacts by increasing spring instream flows and decreasing instream flows later in the year?
- Please provide the current status of research into logging and snow retention. While both sublimation and evaporation must both be taken into account, given adjacent 100-acre south-

facing sites, which site would retain snowpack longer, a recently logged site, a site harvested 20 years ago, or a natural never logged site?

As reported in the *New York Times*, for decades, the dry season in the Amazon rainforest has been getting drier. A new study, published in *Nature Communications*, found that about 75% of the decrease in rainfall is directly linked to deforestation. In addition, the study also found that tree loss was partly responsible for increased heat across the Amazon. According to the study, since 1985, the hottest days in the Amazon have warmed by about 3.6 degrees Fahrenheit. About 16% of that increase, the researchers found, was because of deforestation. Amazon trees pull water from the soil and, through a process known as transpiration, release that moisture through tiny pores on their leaves. There are hundreds of billions of trees in the Amazon Basin, and the water they collectively release into the air is estimated to contribute more than 40% of all the region's rainfall.

<https://www.seattletimes.com/nation-world/scientists-may-have-identified-a-culprit-behind-declining-amazon-rains/>

- Please explain how the O-WNF has taken into account its management and logging on the O-WNF and the proposed project area in terms of deforestation and contribution to drought.

COMMENT:

- How much of the O-WNF remains unsurveyed or have wildlife surveys that are out of date? How much of the proposed project area remains unsurveyed or have wildlife surveys that are out of date?

COMMENT: DEA-4 Table 7 contains one brief mention of invasive plants. But the DEA contains no references to herbicides or the acreage of application that would take place under this proposed action.

- In order to provide a proper assessment of the probable significant adverse impacts from the proposed project, the O-WNF needs to include an analysis of invasive plant treatment, specific herbicides to be used and quantities over the 30-year life of the project.

COMMENT: DEA-5 contains only a brief paragraph in Table 7 on scenery with no pictures provided. Again, this does not represent a series effort to analysis impacts and an EIS must be prepared.

COMMENT: DEA-24 states:

“Tribal use of Traditional Territory can be affected by Forest Service land management policies and actions. Federal agencies have a responsibility to consult, coordinate, and communicate with Tribes on a government-to-government basis to disclose potential impacts to Tribal government interests and provide the opportunity for comment on those potential impacts.”

- How has the O-WNF inventoried cultural features, such as “culturally modified trees”?
- Have these been found within the proposed project area?

<https://www.seattletimes.com/seattle-news/environment/the-pacific-northwest-trees-shaped-by-generations-of-people/>

COMMENT: The DEA-25 lists page 54 lists Pertinent Executive Orders. Was the Immediate Expansion of American Timber Production EO 14225, issued on March 1, 2025, considered? If not, why not?

COMMENT:

- Will the O-WNF provide at least a 30-day period for public review and comment, with responses, on the selected thinning units and related actions, including a summary of proposed units, including maps, to share with the public, and a silviculturist summary of prescriptions?

SUMMARY

In conclusion, the short justifications for issuing a Finding of No Significant Impact are inadequate and an Environmental Impact Statement must be prepared.

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