

Regional Forester, Objection Reviewing Officer  
Pacific Northwest Region, USDA Forest Service  
Attn: 1570 Appeals and Objection

June 8<sup>th</sup>, 2022

RE:     Objection to the Twisp Restoration Project Draft Decision and Final EA  
          Methow Valley Ranger District, Okanogan-Wenatchee National Forest

### **TRP Changes**

I submitted comments to the Twisp Restoration Project in 2019 and 2020. At that time the project was considerably larger than what it has been reduced to now. This reduction in large part was due to the Cedar Creek fire in the summer of 2021. Some comments from 2020 were taken into consideration for treatments, and some changes were made based on these comments.

But as Kristin Bail has said the project has changed substantially.

“The project area and proposed actions changed substantially between the Draft and Final EAs due to impacts from the 2021 Cedar Creek Fire.

In the meanwhile the Cedar Creek Fire started July 8<sup>th</sup>, 2021, which changed the footprint of the project. Instead of giving opportunities for public comment on the new project, the Forest Service picked up where they had left off, with the public going through the objection period, on what amounts to a new project.

The Final EA states: Chapter 1-3 pg. 7-10

Because of wildfire and suppression-related impacts and the need to re-assess the baseline condition in many areas, the project area has been reduced by 69%.

The issues have changed because the project has changed.

### **Project Funding**

I did not talk about project funding in my comments from 2020, but since the project is reduced in size this is new information. The funding is based on 2020 and the 77,000 acre project, not the revised 24,000 acre project. There will be far less revenue generated due to the decrease in size.

My concern is that the non-timber cutting aspect of the project will not be completed as stated in the Needs assessment. It is suggested that additional funding could be obtained through Collaboratives, the Tribes, etc. but there is no guarantee.

### **Dozer Lines**

I did mention dozer lines in my 2020 comments. According to the 2022 Fire map, I am seeing dozer lines on many of the ridgetops. A number of the ridgetops do not have many trees on them at all. I have hiked on many of them and can attest this. Where I have seen ridgetop bulldozing used, in the 2014 and

2015 fires in the Twisp River Drainage, is that these lines are still healing and may never heal due to the soil damage that occurred. One ridge in particular, the Canyon Creek Ridge, in the 2018 fire was damaged severely and no restoration work has been done. Another, from the 2020 fire at Vetch Creek was bulldozed and had little vegetation but what it did have, burned to a crisp.

I have also seen where off-road vehicles have been using these fire lines. These are the reasons I am objecting to bulldozers on the ridgetops. I have no scientific data, but I know what I observe and see in the forests.

### **Data Gathering**

Landscape Evaluation pg. 10, 2.4 Data Collection Aerial photography for the Twisp project area was flown in 2015 and 2017 as part of the Forest Service special projects fund. Initially only the three watersheds of Middle Twisp, Lower Twisp, and Little Bridge Creek were flown, and then in 2017 the Upper Twisp watershed was flown as well. The imagery is 25cm stereo photography in color and infrared. Photo-interpretation was conducted in 2018 using DAT/EM Summit software interfaced with ESRI ArcGIS. A rigorous Quality Assurance and Quality Control process was then implemented in the summer of 2018 to insure consistency in the photo-interpretation.

In the late summer of 2018, the Crescent Mountain Fire burned through significant portions of the Upper and Middle Twisp watersheds. To account for the changes introduced by the fire, the photo-interpreted attributes were adjusted according to estimated vegetation mortality, as 11 determined by satellite data (GTAC, 2019).

I find no other data gathering by air for the TRP since 2019. These images would be different than the images cited above and how they came about. This difference is a concern.

### **Segmenting**

Aquatic restoration was in the original 2020 EA Draft. For the 2022 treatments, the Twisp Aquatic Restoration Project was created separate from the Twisp Restoration Project. There was a 20 day public comment period, but it went unnoticed because most people had commented on it originally. But since it was separated out and was a new project, there should have been a longer comment period.

Also, with regard to the newly announced Midnight Restoration Project, that was originally part of the TRP, that results in two separate NEPA analyses for actions the Forest Service says were connected.

40 CFR 1508.25 (a)(1) states: “Connected actions are those proposed Federal actions that are ‘closely related’ and ‘should be discussed’ in the same NEPA document. Proposed actions are connected if they...are interdependent parts of a larger action and depend upon the larger action for their justification.”

## Transparency

According to a story in the Methow Valley News from February 2<sup>nd</sup>, 2022, there was a meeting between the North Central Washington Forest Health Collaborative and the Methow Valley Ranger District to discuss options after the 2021 Cedar Creek Fire. The agencies chose the option of “eliminating watersheds burned in the fire and relying on the original analysis for the unaffected areas.”

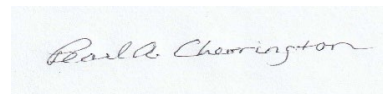
The Collaborative has many members and this meeting with the Forest Service should have let the public know that decisions were being made. Hence a public comment period for the revamped TRP.

The Midnight Project has been discovered in the community by word of mouth and only when Kristin Bail mentioned it in the Methow Valley News. This is another project, segmented off of the TRP, that should have announced a public scoping notice.

In summary, I believe that since there were significant changes to the original TRP plan that a new public comment opportunity should have been presented.

Thank you for your time and this concludes my objections.

Sincerely,

A handwritten signature in cursive script, reading "Pearl R. Cherrington", written in dark ink on a light blue background.

Pearl Cherrington