

June 14, 2022

Regional Forester, Objection Reviewing Officer
Pacific Northwest Region, USDA Forest Service
Attn: 1570 Appeals and Objection
PO Box 3623 Portland, Oregon 97208-3623.

RE: Objection to Twisp Restoration Project (56554)

Dear Regional Forester Casamassa,

We, the undersigned residents of the Second Mile Ranch in the Poorman Creek watershed in Twisp, Washington, would like to extend our gratitude to Region 6 for your shift in focus in recent years to forest health and ecosystem restoration. We also applaud the Okanogan-Wenatchee National Forest (OWNF) in their adoption of the OWNF Forest Restoration Strategy (FRS) (2012) to codify a scientifically based approach for landscape evaluation and development of terrestrial restoration prescriptions. We are a community surrounded by National Forest – this was an intentional decision for us when we settled here 50 years ago. We have lived off the land and with the land, and we have an intimate relationship with the changes in the Poorman Creek landscape over time. We are deeply invested in ensuring the ecological integrity of this landscape is preserved for generations to come.

Our local ambassador to the Twisp Restoration NEPA effort, Michael Bird Shaffer, has lived on Second Mile Ranch his entire life. He brings extensive first-hand experience in fire management, with over 10 years as a wildland firefighter preceded by formative experiences working in forestry throughout high school and college. He holds a bachelor's degree from Central Washington University in environmental studies and outdoor recreation. As a professional outdoor and action sports athlete, he grew up exploring the wilderness of the Poorman Creek watershed and has intimate knowledge of its diversity of forest stands, ridges, streams, meadows, and shrublands. It is with this intimate knowledge and care for the landscape and its future that these comments are crafted.

We feel the Twisp Restoration Project (TRP) on the Methow Valley Ranger District (MVRD) has the potential to serve as a nationwide model for watershed-scale restoration and forest health with strong community buy-in. While we are supportive of the Forest Service's scientifically sound policies for watershed-scale restoration projects, we feel the TRP in its current form deviates fundamentally from these principles in numerous ways. This letter serves as our official objection, and it provides details on the aspects of the project we feel are incongruous with your stated agency objectives and adopted policies. We reiterate and clarify concerns submitted during the public comment period for the Draft Environmental Assessment (EA), as we feel they were not adequately addressed by changes between the draft and final versions of the EA.

- **Inadequate ecological justification for proposed terrestrial treatments** – The Final TRP EA does not provide adequate justifications for terrestrial treatments given landscape evaluation results; the MVRD did not “show their work” in this regard. We are not opposed to scientifically validated and closely monitored thinning efforts in stands where this is warranted, however the extensive proposed terrestrial treatments (e.g., widespread Stand Improvement and Matrix thinning, Riparian Reserve thinning, Stand Regeneration, Shaded Fuel Breaks, etc.) are presented in the Final EA without provision of adequate scientific rationale and linkages to landscape evaluation results. In addition, condition-based NEPA does not provide adequate clarity to our community on exactly what treatments will occur in what locations, which is unacceptable given the extensive treatment areas presented in the EA. Treatment prescriptions are not tailored to address site-specific details on landscape and stand condition. For example, thinning treatments on dry, southwest slopes to encourage development of open ponderosa pine stands should look much different from treatments on wetter, cooler north-facing slopes that naturally support a more diverse forest type. Likewise, valley bottoms characterized by cool, moist conditions should be maintained to support denser, multistory habitat important to key wildlife species, such as fishers. In another example, the only Stand Regeneration unit in the entire project area (Unit 486) is located in the Poorman Creek drainage; what is the rationale for a clearcut in this location, especially immediately upslope from a Riparian Reserve? In addition, the Riparian Reserve thinning treatment in Units 486 and 206 that was not

included in the Draft EA and requires robust science-based justification given the steep slopes and potential erosion hazard in this unit. Mistletoe abatement should employ varied silviculture strategies such as limbing-up as opposed to clear-cut to protect species that utilize these habitat types. **We adamantly request scientifically based and ecologically sound revised stand prescriptions be developed based on site-specific landscape conditions rather than blanket prescriptions based on landscape position (e.g., shaded fuel breaks).**

- **Unacceptable level of ecological impact** - Logging/overstory thinning on slopes over 35 degrees represents an unacceptable erosion hazard risk due to disturbance of fragile soils and vegetation, particularly on dry sites. What is the ecological rationale for ensuring the benefits outweigh the risks in these scenarios? In terms of fire lines, what is the ecological justification for the proposed extensive ridgetop dozer line network in Poorman Creek as opposed to strategically positioned hand lines if the purpose is containment of prescribed fire treatments? Many of these ridgelines are dominated by sensitive shrub-steppe vegetation and/or important forest edge habitat with mature trees (see photos in Attachment A). Clearing a dozer line-width of shrub-steppe habitat is unnecessary and will create the negative effects of (1) disrupting wildlife, (2) inviting a plethora of invasive weeds into an otherwise intact shrub-steppe ecosystem, and (3) serving as an attractive nuisance to off road vehicles and associated increased fire hazard risk. In addition, what is MVRD's plan for maintaining these fire breaks over time? If the prescribed fire treatments these fire lines are intended to contain are not implemented immediately following fire line installation, they will be ineffective given the rapid regrowth of vegetation, particularly weed species that could exacerbate fire risk. **We request you remove dozer fire lines and steep slope treatments from the proposal. We request you reevaluate hand line locations and timing to ensure impacts to sensitive shrub-steppe habitats are minimized.**
- **Road questions** - Why is road 4300482 (lower spur off 4300300) receiving a Closed to Open treatment if it only provides access to closed roads? This will invite unauthorized use into these areas. Also, the limited extent of proposed changes to the road network in Poorman Creek - primarily Open to Closed and Closed or Unauthorized to be Decommissioned - appear to underserve the proposed treatment areas. How are all the proposed treatment areas going to be accessed without additional roads? We are concerned additional roads will be needed that are not disclosed in the EA, and we are concerned any road improvements will be taken advantage of by off-road vehicles. **We request additional information about road closure/decommissioning plans, and we request closed/decommissioned roads be effectively gated/blocked off to prevent unauthorized use.**
- **Inadequate evaluation of aquatic impacts** – Aquatic impacts caused by heavy equipment performing commercial thinning operations on steep slopes (including the Regen unit 486 upslope of a tributary to Poorman Creek and shaded fuel breaks, which are proposed along upper benches above steep riparian side slopes), temporary roads, and dozer lines were not adequately addressed in the Final EA. In the face of climate change, how are these extensive treatments going to impact stream sedimentation, hydrologic processes in the Poorman Creek system (e.g., flashiness), stream temperatures, and overall ecological function in Poorman Creek, especially given potential impacts to downstream Endangered Species Act (ESA)-listed salmonids? What controls are in place to ensure adequate mitigation measures are taken to (1) prevent erosion and subsequent stream sedimentation, (2) ensure stream temperatures are not impacted by riparian treatments and loss of cover, and (3) buffer impacts to the hydrologic regime caused by reduction in vegetative coverage. The Hydrology and Fisheries specialist reports do not provide adequate analyses of these potential impacts. **We respectfully request additional analysis and detailed descriptions of how proposed treatments and mitigation measures will result in minimal impacts to aquatic resources in Poorman Creek.**
- **Inadequate detail on prescribed fire effects** – Hand pile and machine pile burning impacts in the Poorman Creek drainage were inadequately evaluated in the Final EA, and they were not communicated to the community. Proposed treatments will result in significant biomass and therefore require extensive prescribed burning events, carbon release, and air quality impacts to adjacent residents. An innovative and unique opportunity to address biomass – biochar – was mistakenly not evaluated as part of this proposal. C6 Forest to Farm Biochar project is located in Twisp in close proximity to the TRP – why was this approach, critical to minimizing air impacts, not given careful evaluation.? The TRP has an exceptionally unique opportunity to be a

national leader and showpiece for innovative approaches to biomass given the proximity of C6 Forest to Farm. **We respectfully request a detailed prescribed fire plan that incorporates community input and evaluates the potential for unhealthy air quality levels and alternative biomass treatments, such as biochar.**

- **Inadequate public outreach** - As described in this letter, we have many unanswered questions about the TRP; the MVRD has only provided the minimum legally required public outreach on this proposal (i.e., virtual public meeting, required public comment periods, etc.) – a project entailing such a tremendous scope and scale of landscape treatments necessitated concerted outreach to affected communities to help us understand exactly what to expect on-the-ground as part of this proposal. This did not occur. Our original comment letter contained a request for an onsite meeting with MVRD Ranger Chris Furr to discuss our concerns, and we did not receive a response to this request. **We respectfully request the opportunity to discuss proposed project treatments in detail on the ground in the Poorman Creek drainage with staff from the Methow Valley Ranger District and contributing scientists to the OWNF FRS (preferably Paul Hessburg and Susan Pritchard) as soon as possible and prior to Region 6 approval of the TRP Final EA.**
- **Lack of Monitoring and Quality Control** – The Final TRP EA does not specify monitoring protocols for ensuring project implementation adheres to planning documents. The document also does not contain standards or protocols potential contractors must comply with to ensure ecological impacts are minimized. Who is going to be in charge of marking units for harvest? Who is in charge of ensuring quality control on treatments? This information is critical to evaluating the efficacy and scientific soundness of the proposal. **We respectfully request compliance monitoring and quality control plans be developed with extensive community involvement prior to final approval of the TRP.**

We appreciate the opportunity for public involvement on the TRP, and we look forward to receiving your response to this objection.

Second Mile Ranch Community Members,



Michael Bird Shaffer

[Redacted address]



Michelle Shaffer

[Redacted address]



Karen Shaffer

Karen and Terry Shaffer

[REDACTED]
[REDACTED]



Glen Schmekel

[REDACTED]
[REDACTED]



Gene and Janie Westlund

[REDACTED]
[REDACTED]

Wayne Mendro
Linda Mendro

Linda and Wayne Mendro

[REDACTED]
[REDACTED]

Kris Labanauskas
Trisha Labanauskas

Kris and Trisha Labanauskas

[REDACTED]
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Regina Labanauskas

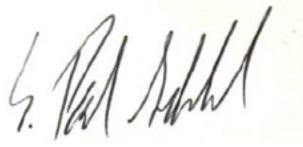
Regina Labanauskas

[REDACTED]
[REDACTED]

Arthur Floyd

Andy Floyd

[REDACTED]
[REDACTED]

A handwritten signature in black ink on a light-colored rectangular piece of paper. The signature is cursive and appears to read "L. Paul Schmekel".

Paul Schmekel

A handwritten signature in black ink. The signature is cursive and reads "Donald A. Wallis".

Don Wallis



Attachment A - Site Photos



