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THE TWISP BIODIVERSITY REHABILITATION ALTERNATIVE *North Cascades Conservation Council (NCCC)*

Background

The Twisp River Watershed is a unique, high-functioning forest ecosystem providing habitat for seven endangered species. It yields pure water, native fish, high-quality wildlife habitat, endemic plants, biodiversity, carbon storage, excellent dispersed recreation and camping. In fact, the primary use of the Twisp River Road Corridor has been access to six campgrounds and nine trailheads.

Due to topography that facilitates ample precipitation, the Twisp forest is a hybrid of “west side” and “east side” forests, with diverse stands of mixed conifer species. The forest is naturally characterized by both open and thick stands of ponderosa pine, Englemann spruce, and mixed species of fir, more dense than is generally found east of the Cascade Mountain Crest.

With this alternative, NCCC is responding to Forest Service proposals for expansive commercial logging, road building, and prescribed burning encompassing 77,000 acres of the Twisp River Watershed with the proposed Twisp Restoration Project and the Midnight Restoration Project. The final decision to implement the 24,000 acre Twisp Restoration Project (TRP), now under litigation, was made in 2022. The 53,000 acre Midnight Project (MRP) was released May 10, 2023 for public comment.

These projects propose to mechanically modify the Twisp forest to return it to “historic” and/or “desired” conditions, although the agency does concede that in part, it was past commercial logging that caused the departure from those presumed conditions.

NCCC believes that “historic conditions” cannot be accurately determined, particularly information specific to the Twisp Watershed. Limited photographic depictions are unscientific. These forests are constantly evolving and do not remain in a static condition. Because they looked different 140 years ago, does not establish that this is the way they’ve always looked, and should look now. It is likely that over their 12,000 year evolution, the Twisp’s forests were often in a condition similar to what we see now.

The “Twisp Biodiversity Rehabilitation Alternative (TBRA)” is offered as a comprehensive, ecologically respectful, and science-based approach to achieve the goal of creating defensible space around communities and private property. It should be presented in a Forest Service Environmental Impact Statement together with an array of Forest Service, and independent alternatives that address the entire Twisp River watershed rather than two separate projects (three projects, if the ongoing Mission Project, part of which is in the Twisp Watershed, is considered).

NCCC does not believe using commercial logging to alter forest conditions previously shaped by wildfires can produce the same results. Logging produces distinct impacts like soil erosion; removal of commercially desirable, fire-resistant trees; increased accumulations of flammable slash; and road construction. Logging does not provide the benefits of fire, like nutrient cycling, ground fuels reduction, and snag recruitment.

Further, logging-based plans proposed by the Forest Service have thus far failed to include a plan to allow natural fire to resume its role in shaping the forest. The forest will not remain in the static condition these projects leave it in. Without a plan to allow fire to resume its natural role, the forest will revert back to its former condition over time.

In addition to creating defensible space, NCCC recognizes opportunities for enhancement of dispersed recreation opportunities. Thus, this alternative proposes expansive plans for road closures, and trail maintenance and construction.

The Forest Service chose not to include a range of alternatives in its Environmental Assessment for the TRP. It presented only one plan, the “Proposed Action.” NCCC’s offering of the TBRA was rejected by the agency. It now is submitted with the intent that it will be included in the EA and following EIS, and should be reviewed alongside alternatives developed by the Forest Service, and other parties.

NEPA requires that a range of alternative be provided, and that “all reasonable alternative” must be considered. The TBRA meets the requirement of “reasonable,” and addresses the objectives cited for the three Twisp Watershed projects.

Research/NEPA Process

In considering management determinations for the Twisp River Watershed, the Forest Service will:

- 1) Prepare an EIS for the 77,000 acre project area.
- 2) Disclose and consider all published studies that analyze the results of past fuels reduction logging and prescribed burning. This analysis will include information pertaining to areas that burned after undergoing fuels reduction logging, and will document the differing intensities of burns in natural (unlogged) forests vs. those that underwent fuels reduction actions. In particular,

the agency must consider: *Have western USA fire suppression and megafire active management approaches become a contemporary Sisyphus?* by DellaSala, et-al; and *Fire Suppression and Logging Exacerbate Fire Intensity* by Bradley, et-al.

- 3) Create a map of the Twisp Watershed that discloses the locations of dense concentrations of ground fuels, and dense stands of timber outside the boundary of the Chelan-Sawtooth Wilderness. This inventory will identify, as closely as possible, those dense timber stands that are due to past logging and fire suppression, versus naturally-occurring dense stands.
- 4) Conduct a study to determine which roads in the project area that are not needed for activities prescribed in this alternative, that should be closed and decommissioned, and which should be converted to trails.
- 5) Develop a plan that determines when naturally-ignited fires outside the Chelan-Sawtooth Wilderness will be allowed to burn, and when fires will be extinguished. All human-caused fires will be suppressed. The emphasis will be on allowing natural fire to resume its role in ecosystem evolution, while protecting homes, private property, recreation facilities, and cultural and historic sites.

Fuels Reduction and Fire Safety

The objective of fuels reduction work in this alternative is to reduce the risk to private property in the wildland-urban interface from unnaturally high-intensity, climate change-driven fires. This alternative will not facilitate fuels reduction on a landscape scale, it will focus on creating defensible space for privately owned land and homes. Credible research shows that wildfires in backcountry and areas that have seen little or not commercial logging, like the Twisp Watershed, are the most resilient to fire. See, *Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States?* by Bradley, et-al).

The objective of restoring “historic conditions” beyond reducing fire risk in the urban/wildland interface is not viable for three reasons: First, there is not sufficient, site-specific data that shows historic conditions over the vast 12,000 year life span of the Twisp forest. Second, climate change has altered the equation of how forest ecosystems are evolving. Third, natural conditions can only be restored by allowing fire to resume its natural role, it cannot be achieved by one-shot logging and prescribed burning projects.

The production of saw timber, chip material, or other raw materials from rehabilitation activities should be considered a by-product from fire risk reduction actions, not an expectation. There should be no targets for timber production, and no timber sales where the contractor is paid with trees. The priority for public lands should be carbon storage, restoring fish and wildlife habitat, and producing clean water and biodiversity.

Fuels reduction work will be governed by the following guidelines:

- (1) Funding dedicated by Congress for intensive rehabilitation work through the Infrastructure Bill and other Congressional Acts will preclude the need for commercial removal of larger, fire-resistant trees to pay contractors. No trees larger than ten inches diameter at breast height will be removed.
- (2) Logging will be by Service Contract only: the contractor will not take possession of any commercially viable timber removed. The Forest Service may sell such timber to sawmills, and/or contract with log trucking companies for transport to manufacturing facilities.
- (3) Logging and burning entries will be precluded from areas designated as "Late Successional Reserves" for ancient forest dependent species and roadless areas, whether inventoried or not. No logging will occur between Twisp River Road #44, southwest to the boundary of the Chelan-Sawtooth Wilderness.
- (4) The management priority will be on reducing unnatural young tree density, and treating heavy ground fuel loading within three miles of private property, recreation facilities, and one half mile from cultural and historic resource sites.
- (5) Dense stands of trees to be removed will be marked on-site by Forest Service silviculturists. "Condition-based management" and "Designation By Prescription" will not be implemented.
- (6) Removal, or reducing the density of stands of young trees will involve varying the spacing of areas to be logged, thus leaving some dense stands to respect their natural frequency and maintain shade, and to respect specific wildlife habitats.
- (7) Logging and heavy equipment operation will be limited to areas previously commercially logged. All yarding of merchantable timber or chip material will be by low-compaction feller-buncher.
- (8) Prescribed burning may occur in areas not previously commercially logged, however, burning will be limited to reducing ground fuel accumulations, particularly downed, jack-strawed logs.
- (9) Logging of standing, live timber is limited to dense stands of mixed fir species and lodgepole pine. No ponderosa pine or Engelmann spruce trees of any size will be cut.
- (10) Prior to prescribed burning, areas with profusions of jack-strawed downed trees will be opened to firewood cutting in areas within 100 feet of open roads, with wood removal limited to downed logs. Logs not accessible, or suitable for firewood will be "lopped" wherever possible, so they are making contact with mineral soil prior to prescribed burning.

(11) Prescribed burning will be monitored by firefighting personnel on-site. Fire containment lines will be limited to hand-construction—no machine construction.

(12) All unmerchantable material created from logging activities will be broadcast burned—no pile burning will be implemented.

(13) No new roads will be constructed. The Forest Service will produce an inventory of existing roads within the project area that will be decommissioned to restore wildlife habitat, decrease erosion, and reduce the risk of human-caused fires.

(14) The Forest Service will develop an evacuation plan for Twisp River campers, hikers, and homeowners to be readily implemented should a fire with potential for rapid spread occur in the Twisp River Corridor.

(15) The Forest Service will develop a plan for managing wildfires post-project. It will allow naturally-ignited fires to resume their role in shaping the ecosystem. All human-caused fires will be suppressed.

(16) The Forest Service will establish a program available to Twisp Corridor land owners to create defensible space on private property, including options for fuels treatment, annual defensive prescribed burning, and to improve local firefighting infrastructure, including firefighting equipment.

Twisp River Road Rehabilitation

The TBRA proposes significant improvements to recreation facilities and opportunities for dispersed recreation in the Twisp Canyon.

The presence of a high-standard road on each side of the Twisp River is unnecessary, and enables increased stream sedimentation and other disturbances, for example, unauthorized ATV use, weed infestations, and human-caused wildfires.

The main Twisp River Road on the east side of the river, Road 44, is the primary recreation use road and can serve the same recreational purpose as Road 4420 on the west side of the river. Forest Road 4420 (including stretches numbered as 4430 and 4435) accesses five trailheads and South Creek Horse Camp. This access can be maintained by decommissioning a section of Road 4420, thus reducing ecological impacts.

Rehabilitation of Road 4420 will include the following provisions:

(1) Convert road 4420 to a single-track trail from War Creek to South Creek. The War Creek Bridge will remain open to motor vehicles to access a new trailhead facility that will be constructed on the west side of the river. The spur road to the existing War Creek trailhead and

spur road 110 will be decommissioned. A new trail will be constructed to meet the existing War Creek Trail.

(2) From War Creek to South Creek, the new trail will be open to hiking, horses and other pack stock, and skiing, and closed to motorized/mechanized vehicles.

(3) Access to the Reynolds, Williams, and South Creek Trails will remain via the bridge over the Twisp River at Mystery Campground. The bridge will access a new trailhead to be built on the west side of the river to service the new Twisp River Trail and the Reynolds and Williams Creek Trails. Spur roads 015 and 040 will be decommissioned, and a new trail will be built along Reynolds Creek to access the existing trail.

(4) A trailhead and pack bridge will be constructed on Road 44 for access to South Creek Camp for horse packers and hikers. All concrete barriers and modern objects not representative of a semi-primitive campsite will be removed from the Camp. The roads and parking areas will be re-seeded with native vegetation, leaving only horse paths and campsites for hikers and pack stock.

(5) All public land on the west side of the Twisp River between the river and the boundary of the Chelan-Sawtooth Wilderness, from War Creek Bridge to the South Creek Camp, will be managed as primitive backcountry.

(6) Roads End Campground will be permanently closed and rehabilitated. Additional campsites will be added to existing Twisp River campgrounds where new space can be provided with minimal resource impacts.

Funding

Funding will be provided by the appropriations from the Infrastructure Bill, the Inflation Reduction Act, and general annual appropriations. Partnerships will contribute to a coordinated effort to secure federal funding via the Washington Congressional delegation.

Decommissioning a road (obliteration or conversion to a trail) costs between \$40,000 and \$110,000 per mile. With road 4420, an approximate cost of \$60,000 per mile is estimated, as none of this road presents mid-slope cuts, and very little intrudes upon the Twisp River riparian area. Fourteen miles of road would be effected, so the total cost would be around \$1mm.

The closure, decommissioning, and conversion to trails of other roads will involve roughly 24 miles, but the actual amount that would be subject to physical removal or re-designed to trails would be determined in the required road inventory.

The costs of dense timber stand treatment, lopping, and prescribed burning will be estimated by the Forest Service in the EIS. An estimated total of 4,000 acres would be subject to logging and/or burning.

To create defensible space for the residences in the Twisp River Corridor that abut federal land, \$3.5mm should be allocated for fuel treatment, annual defensive prescribed burning, and local firefighting infrastructure including firefighting equipment, in concert with local landowners.

Collaboration and Public Involvement

All publics will be given equal opportunity to influence every aspect of the EIS for the Twisp Watershed, including the development of a Proposed Action and inclusion of independent alternatives. There will be no exclusive access to information or influence with agency personnel provided to any sanctioned or non-sanctioned entity. Meeting requests from all publics will be honored.