



PINE FOREST OWNERS ASSOCIATION

12 December 2020

Ms. Kristin Bail, Forest Supervisor
% Ms. Eireann Pederson
Methow Valley Ranger District
24 W. Chewuch Rd
Winthrop, WA 98862

RE: Twisp Restoration Project Draft Environmental Assessment

Dear Ms. Bail,

This letter responds to the 22 October 2020 notice of opportunity to comment on the draft environmental assessment (EA) for the proposed Twisp Restoration project. We found the EA and its supporting documents to be very well written and thorough. As the President of its Board of Directors, I submit the following comments on behalf of the Pine Forest Owners' Association (PFOA).

First, I want to reiterate PFOA's ***emphatic support*** of sound treatment to restore forest health and fire resilience in the lands along and near our 1.5-mile border with the Okanogan-Wenatchee National Forest (OWNF), as stated in our December 2019 scoping comments. PFOA and Pine Forest residents have continued to conduct our own forest health and fuel reduction treatments within our 500-acre community and are very enthusiastic about similar efforts occurring on adjoining lands. In particular, PFOA is pleased to learn that nearby forested lands to the west and south of Pine Forest will undergo **both over- and understory thinning**, with an approach that matches the one we have taken, as well, and we encourage implementation of that work as soon as possible.

We also have a few comments on specific details of the proposal:

1. The EA's Appendix A indicates that, to be operationally feasible, ground-based commercial treatments would "generally require a road and suitable landing at the bottom of the unit." The project lands are uphill of Pine Forest to both the west and south. There are existing roads near the bottom of most, but not all, of those OWNF lands. If treatment of areas where there is not a road would otherwise be infeasible, PFOA would be open to discussing the possible use of **Pine Forest roads** during implementation of the project. We would, of course, need to agree on measures to reduce impacts to residents during the work and to repair damage immediately thereafter.

2. We understand that the project will include **decommissioning of temporary roads** necessary for project implementation, as well as some existing roads, and that the intent of decommissioning is to render such roads un-driveable. The proposed temporary road near the southwest corner of Pine Forest (temp1029 on Figure 6, Appendix D) would be proximate to two of our residents' driveways and one of our neighborhood roads, all of which are privately maintained and not open for public use. As such, PFOA requests that decommissioning includes measures to preclude vehicle access from the Pine Forest side of that road, as well from road 4410200.
3. In addition PFOA also requests that the project incorporate measures to preclude **unauthorized vehicle access** to an existing, apparently unmapped road that parallels Pine Forest's west boundary northward from what we call Longleaf Lane, a road for which we hold a special use permit (MET532). (See Attachment A.) The road provides access to two of Pine Forest's drinking water reservoirs, authorized under a different special use permit (MET536), but since it also connects to other roads on the OWNF, there is periodic unauthorized use of it, particularly during hunting season. Most such users either enter or exit the road via Pine Forest's privately maintained thoroughfares. PFOA would need to be able to continue occasional use of the road to access the reservoirs for maintenance and repairs, including emergency repairs.
4. The Alternative 2 proposal includes converting a portion of road 4410200, also known as the Meadowlark trail, administrative access only (ML2A). We assume that change in designation would include placement of a gate or similar structure to allow only authorized access. An unmapped route that extends westward from Pine Forest's Nighthawk Ridge Road ultimately connects to Meadowlark via another unmapped route and the Blue Jay trail. (See Attachment A.) This route provides an unofficial **emergency egress** for residents in the event that wildland fire or other event blocks egress via the Pine Forest entrance and was flagged for such use by structure protection firefighters stationed here during the Crescent Mountain fire. (A barbed wire gate currently deters use, but could be easily opened during an emergency.) Figure 7, in Appendix D, shows the ML2A designation extending slightly northeastward from the intersection of roads 4410200 and 4410330 and onto Blue Jay. Placement of an access control at that location would prevent use of the route as an emergency egress, and PFOA requests that the control instead be placed just southward of that intersection.
5. Finally, Appendix A's discussion of the seasonal timing of work indicates that both understory thinning and commercial harvest would occur from spring through autumn. That is the same seasonal schedule that Pine Forest has used in our thinning efforts. Unfortunately, we are currently experiencing outbreaks of both **western pine and ips engraver beetles**, die-offs from which initially entered Pine Forest from the OWNF to our west and south. Proposed design feature V5 (Appendix B) would treat areas used for staging of green trees, but it is not clear whether such treatment would extend to fresh pine slash. During our thinning efforts, PFOA has attempted to reduce the attraction of beetles by

adhering to a timing window during which to avoid stacking fresh pine (logs and slash). (We cut pine during that period only when it was accessible with a chipper or could be removed right away.) Since this is an area of active infestation, we request that, if feasible, thinning of pine along and near our west and south borders follow the same type of timing window and, if that is infeasible, that work in those areas incorporate other measures to minimize the likelihood of exacerbating the infestation. If there are no feasible measures to minimize beetle impacts, PFOA would still support the thinning, because we believe its benefits would outweigh the beetle-related detriments.

As stated in our scoping letter, PFOA believes the Twisp Restoration project EA accurately identifies critically needed actions that will both improve forest health and reduce the chance of catastrophic destruction from fires in the project area and on adjoining properties. As a result, PFOA heartily supports the proposal and stands ready to assist its implementation in any way we can. Thank you for all of your hard work and for the opportunity to review and submit comments on the EA.

Sincerely,

Robin Jeffers, Board President
On behalf of PFOA