THE METHOW FIRE RISK REDUCTION AND BIODIVERSITY CONSERVATION ALTERNATIVE ("THE METHOW COMMUNITY ALTERNATIVE")

NORTH CASCADES CONSERVATION COUNCIL

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I. Background

The Methow River Watershed is a unique, high-functioning forest ecosystem providing habitat for seven animal species listed under the Endangered Species Act. It yields pure water, native fish, high-quality wildlife habitat, endemic plants, biodiversity, carbon storage, excellent dispersed recreation and camping.

Due to topography that facilitates ample precipitation, the Methow forests are a hybrid of "westside" and "eastside" forests found on either side of the Cascade Mountain Crest, presenting forests more dense than are generally found east of the Cascades. It contains naturally diverse stands of mixed conifer species, and generous amounts of deciduous trees, mostly cottonwood and aspen. The forest is naturally characterized by both open and thick stands of trees.

With the *Methow Community Alternative* (MCA), North Cascades Conservation Council (NCCC) is responding to Forest Service proposals for expansive commercial logging, road building, and prescribed burning encompassing approximately 190,000 acres of the Methow River Watershed. Projects include the proposed Mission Restoration Project, the Twisp Restoration Project, the Midnight Restoration Project, and the Upper Methow Restoration Project. We advise that all fuels reduction activities proposed in the Methow River Watershed must be analyzed in a single Environmental Impact Statement (EIS). However, that does not preclude the inclusion of this alternative in an EA for any of the individual projects.

The existing Forest Service projects propose to mechanically modify the Methow forests on a landscape scale to return it to an alleged "historic" and/or "desired" condition. This alternative considers means for reducing wildfire risk that do not seek to change the forest ecosystem, but rather allows the community to adapt to increased wildfire risks brought by climate change by creating defensible space with surgical fuels management projects, promoting home hardening, and bolstering the firefighting capabilities of local communities.

The MCA is intended to be presented and analyzed in a Forest Service EIS that jointly reviews all projects in the Methow Watershed together with an array of Forest Service-developed, and independently offered alternatives.

In addition to creating defensible space, NCCC recognizes opportunities for further reduction of wildfire risk via closure of forest roads. Human-caused fires constitute 84 percent of all wildfires, and the vast majority of those are ignited close to roads. We also seek enhancement of dispersed recreation opportunities in the Twisp River Corridor—which has for decades been used primarily, if not exclusively, for dispersed recreation—via road closures and construction of new trails.

NEPA requires that a range of alternative be provided, and that "all reasonable alternatives" must be considered. The MCA meets the requirement of "reasonable," and addresses the objectives cited for the projects proposed in the Methow Watershed.

II. Purpose and Need

NCCC accepts the reality that extreme fire events in dry conditions both in back and front country on public land cannot reasonably be prevented, and that climate change has exacerbated the conditions favorable to such events. We therefore propose an alternative that focuses on protecting homes, communities, and private property rather than attempting to change the composition of the forest ecosystem.

This alternative complies with the purposes and needs as outlined in the environmental assessments for the Twisp and Midnight Projects. Those are supplemented with the following purposes and needs:

1) Reduce wildfire risks to private property, homes, and communities by developing fuels reduction projects that will increase the likelihood of stopping moderate intensity wildfires before they reach homes and communities. This will be accomplished by providing an option for creating a reduced ground fuel perimeter within the Wildland Urban Interface.

2) Enhance community wildfire preparedness by providing financial assistance for fire wise improvements to homes and community structures, and establishing local warning systems and escape routes while bolstering the wildland firefighting infrastructure of local municipalities.

3) Protect existing critical habitat and retain biodiversity by implementing fuels reduction projects that respect existing natural forest structure and composition, and preclude activities outside existing protected areas.

4) Contribute to combating climate change by retaining the natural carbon storage capacity of forests in the Methow Watershed.

5) Reduce the risk of human-caused wildfires via road closures and increased public education.

6) Preserve and enhance the high quality dispersed recreation opportunities that have traditionally been available, particularly in the Twisp River Corridor.

III. Research/NEPA Process

In considering management determinations for fire risk reduction in the Methow River Watershed, the Forest Service will prepare an Environmental Impact Statement (EIS) for all fuels reduction activities in the Watershed. This EIS will include this alternative, all other reasonable alternatives prepared by individuals or entities outside the federal government, and alternatives devised by the Forest Service.

The EIS will disclose and consider all published studies that analyze the results of past fuels reduction logging and prescribed burning toward reducing wildfire risk to homes and communities. It will consider the root causes of wildfires, and areas of the forest where wildfires are most and least likely to threaten homes and communities. This analysis will document the differing intensities of burns in natural (unlogged) forests vs. those subject to 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.

The EIS will include a map of the Methow Watershed that discloses the locations of dense concentrations of ground fuels, and dense stands of timber outside the boundary of the Chelan-Sawtooth and Pasayten Wilderness Areas.

The EIS will include a study to determine which roads in the Twisp River and Goat Creek Drainages that are not needed for activities prescribed in this alternative, or are not established routes for recreation access, should be closed and decommissioned. This road evaluation will also identify those roads not directly used for access to established recreation facilities that are most likely to facilitate human caused fires.

Finally, the EIS will develop a plan that determines when naturally-ignited fires outside the Chelan-Sawtooth and Pasayten Wilderness Areas will be allowed to burn, and when fires will be extinguished. All human-caused fires, or fires reasonably presumed to be caused by other than natural occurrences, will be suppressed. The emphasis will be on allowing natural fire to resume

its role in ecosystem evolution, while simultaneously protecting homes, private property, recreation facilities, and cultural and historic sites.

Only an inclusive public process that provides equal opportunity for all members of the communities will allow idea sharing and discussion that will produce a plan for which there will be wide public support. The EIS will assure equal access to information and influence to all people, interest groups, businesses, governments, and agencies.

IV. Motivation for this Alternative

This alternative is reasonable because there is not a consensus on the science regarding historic conditions and strategies for fuels reduction geared toward public safety. This demands multiple alternatives. This plan provides a contrasting alternative to the proposed ecosystem-altering logging projects that have been presented in the Mission Restoration Project, the Twisp Restoration Project, and the Proposed Action for the Midnight Project. Those plans seek to restore alleged "historic," or "desired" conditions toward the objective of reducing wildfire risk and combating climate change.

The objective of fuels reduction work in this alternative is to reduce the risk to homes, communities, and private property in the wildland-urban interface from moderate intensity wildfires. It will provide the infrastructure for protection from high-intensity fires while maintaining native forest structure and respecting present ecological and recreational values.

This alternative will not facilitate fuels reduction on a landscape scale, as there is ample science that undisturbed forests are far more resilient to climate-driven wildfires than "managed" (previously logged) forests. See, *Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States?* by Bradley, et-al). We therefore focus on action within the wildland urban interface.

Information showing that using logging to restore "historic conditions" on an ecosystem scale is unavailable. There is a lack of evidence showing specific forest conditions throughout the Methow Watershed. To our knowledge, present information only vaguely shows conditions that existed approximately 150 years ago. Using this information to portray "historic conditions" improperly suggests the conditions that existed over the 12,000 year life span of these forests are static. There is no proof that a "desired condition" can be created, and maintained.

This alternative was assembled in part because we believe natural conditions impacted by past destructive logging practices and fire suppression can only be restored by allowing fire to resume its natural role. We contend that modern firefighting equipment and procedures have only been combating wildfires since the late 1940's. With fire rotations that range from 20 to 80 years, we do not believe fire suppression has resulted in a grossly unnatural condition that requires such drastic measures as landscape-altering logging. Moreover, climate change has altered the equation of how forest ecosystems are evolving.

There does not appear to be a scientific consensus as to the past condition of forests. The study, *Countering Omitted Evidence of Variable Historical Forests and Fire Regime in Western USA Dry Forests: The Low-Severity-Fire Model Rejected*, found that historic information shows severe wildfires have always occurred, and that dense stands of timber in forests east of the Cascade Mountain crest are more common than previously portrayed.

Finally, this alternative eschews the production of saw timber, chip material, or other raw materials from activities designed to reduce wildfire risk as an objective. Any commercial product produced should be considered a bonus from fire risk reduction actions, not an expectation. There should be no targets for timber production tied to these projects. Protecting communities from wildfire should not involve the often conflicting and unrelated objective of commercial production.

V. Fuels Reduction Project Guidelines

Fuels reduction work on national forest land in the Methow Watershed will be governed by the following guidelines:

(1) Mechanical fuels reduction (including prescribed burning) will be limited to areas within a maximum of one half mile from private property, and will occur in cooperation with land owners whose property adjoins national forest land. Mechanical fuels reduction can occur within one quarter mile of identified cultural and historic sites on public land.

(2) No trees larger than ten inches diameter at breast height will be removed. Species to be removed are limited to grand fir, Douglas fir, and lodgepole pine. In the removal of overstory, consideration will be given to maintaining shade to avoid exposure of ground cover to drying.

(3) Methods and procedures for reducing fuel loads may include limbing, lopping of downed material, reduction or removal of dense stands of young timber, and prescribed burning. In dense stands of dead trees, removal of trees larger than 10 inches is permitted, whereafter such trees can be sold as saw timber, or yarded to roads for firewood cutters. However, snag retention will be a priority.

(4) Yarding of logs to be removed will be limited to low-compaction methods, including feller-bunchers, or skyline yarding systems. No skidding of logs across topsoil is permitted.

(5) Logging will be by Service Contract only: the contractor will not be paid with trees, but with federal funds earmarked for fuels reduction. The Forest Service may sell any commercially viable timber removed.

(6) Any standing live or dead trees to be removed will be marked on-site by Forest Service silviculturists. “Designation By Prescription” will not be implemented.

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

(8) All unmerchantable material created from logging activities will be broadcast burned within one year of project completion—no pile burning will be implemented.

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

(10) Logging and burning will be precluded from "Late Successional Reserves" under the Northwest Forest Plan.

(11) The Forest Service will intensify its patrol of recreation sites and areas during times of high fire danger, and increase signage and other means of educating the public about the risk of using fire for any purpose, and the risk of ignitions from vehicles. It will develop an evacuation plan for Twisp River campers, hikers, and homeowners should a fire with potential for rapid spread occur in the Twisp River Corridor.

(12) The Forest Service will assist local communities with establishing and maintaining an emergency evacuation system that will include sirens and other means of warning people of fire danger. It will investigate the viability of a fourth escape route from the Methow Valley apart from Highway 20 and Highway 153. Consideration will be given only to existing roads.

(13) The Forest Service will work with local communities to establish ordinances requiring home hardening upon construction, and to facilitate fire-wise improvement of existing homes, leveraging available state and other funding with federal dollars.

(14) Federal funds will be dedicated to improving local firefighting infrastructure, including firefighting equipment and training, and employing local "hot shot" crews.

(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, limiting suppression to presumed human-caused fires and fires that threaten homes and communities.

VI. Twisp River Road Rehabilitation

The MCA proposes significant improvements to recreation facilities and opportunities for dispersed recreation in the Twisp Corridor, while reducing the frequency of human-caused wildfires.

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. It will be 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 constructed 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 prior to closure of the road. 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.

VII. 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 $50,000 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 $700,000.

The closure, decommissioning, and conversion to trails of other roads will involve roughly 10 miles, but the actual amount that would be subject to physical removal or re-designed to trails would be determined in the road inventory required by this alternative.

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 1,000 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, and to create fire safety measures in municipalities, $3.5mm should be allocated for fuel treatment and local firefighting infrastructure including firefighting equipment.

VIII. Collaboration and Public Involvement

All publics will be given equal opportunity to influence every aspect of the EIS for the Methow 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.