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Title:

Comments: My involvement with the Methow Valley Citizens Council has provided me with information about this proposal - the background to this proposed action, as well as the nature of their concerns. I have supported the MVCC for years and fully support their mission to research, communicate knowledge and concerns, and assist in problem solving and articulating goals to further a mission I share: science-based and forward thinking stewardship of the many aspects of the environment of the Methow Valley. To that end, my comments echo their delineated concerns and please consider my attachment to be my preferred expression of my own concerns.

I would also like to emphasize that the environmental impact from ATV traffic that I have observed from years of hiking in the Twisp River drainages - dust, noise, disturbed trails, torn-up vegetation, scaring away birds and animals - is not compensated by the "fun" to be had by running these vehicles in wilderness areas. My preference would be that that type of recreation - that heavily impacts its surroundings and which affects the enjoyment of folks who just are trying to get out in and appreciate nature - be limited to areas which aren't trying to do double duty as preservation lands. Alternatively, permits to ride around these trails should be priced so that the funds raised cover the damage caused - say \$1,000?

Either way, I also think that this proposal should be separated from the Restoration Plan and considered separately; maybe after the success of the actual restoration actions have been implemented and evaluated?

From attached document "Twisp Plan.docx":

1. The project's scale and complexity demand additional public engagement

While Methow Valley Citizens Council advocates for forest restoration in the face of climate change, a project of this size and duration, (77,000 acres and more than a decade), deserves much more scrutiny to make sure it is done right. The proposal contains many new concepts which will require time for our community to understand and comment on intelligently. There's a need for site visits and more public meetings over time to learn about what is being planned and how we'll all be impacted. Public comment should not be a one-time opportunity. We all have a role to play in influencing how this project unfolds as well as supporting our public lands. We have requested that the Forest Service:

[bull] Issue separate decisions for each of the five phases of the project and allow for public input at each phase and decision point. Also incorporate an adaptive management strategy that allows course corrections along the way as new information becomes available.

2. The proposal allows for the cutting of large trees, departing from the Forest Service's own Restoration Strategy

The 2012 Forest Restoration Strategy describes the Forest Service's method for implementing their [ldquo]Restoration Vision.[rdquo] It provides the scientific basis for forest restoration treatments. The Twisp proposal appears to deviate from the guidance set forth in the Restoration Strategy without explanation. Most notably, while the current written direction for the Okanogan Wenatchee National Forest discourages cutting large trees over 20[rdquo] in diameter, the Twisp project proposes cutting trees up to 30[rdquo] while acknowledging large and old trees are deficient within the project area. This seems to contradict the Forest Service's own guidance.

Further, monitoring and evaluation are essential to successful forest restoration yet are not included in the proposal. The Restoration Strategy emphasizes their importance. On a project of this scope, tracking outcomes in order to continuously improve should be prioritized.

The Forest Service should:

1.

- * Follow the direction outlined in the restoration strategy and avoid logging trees over 20" in diameter.

Logging of any larger trees should be described as an exception to the rule.

- * Develop a clear monitoring and tracking program and develop measures to adapt the project over time.

3. New ATV Access along the Upper Twisp River doesn't belong in the proposal.

22 miles of wheeled ATV road access (from Twisp River Sno-Park to Roads End and back to War Creek Campground) are included in this forest restoration proposal. The Methow Valley and Okanogan County have a long history of ATV regulation and use. Concerns over user conflicts, wildlife impacts, unauthorized creation of trails, illegal use and lack of enforcement should be considered in detail. A forest restoration project isn't the place for this. ATV use is not compatible with ecological restoration objectives. Instead, ATV road authorization should be proposed and evaluated in the Forest's forthcoming Travel Management Plan.

We ask that:

[bull] The Forest Service remove the ATV access component of the project and consider this proposal in a separate process.

4. The proposal should fully take into account large areas already in special old growth reserves, roadless status and/or with potential for wilderness designation

Old growth reserves are part of a regional network established for the purpose of maintaining old growth habitat. Roadless Areas are lands determined to have wilderness values and which could be considered for that status in the future. The current proposal fails to show how aggressive thinning and fuel breaks in these areas will improve the forest's ability to maintain and improve mature forest habitat. These areas have been set aside for conservation and need to be managed to preserve functioning habitat, while improving resilience.

Key points are:

1.

- * The Forest Service should not call for large fuel breaks in old-growth reserves and focus on thinning small trees from below in Roadless Areas.

- * Treatments in these protected areas should be consistent with their management objectives, permitting only thinning of small-diameter trees and avoiding new road construction and ground disturbing activities.

5. Salvage Logging should not be included.

Salvage logging is proposed in the designated Sawtooth Roadless Area, including some lands within the footprint of the 2018 Crescent Mountain Fire. While the stated goal is reducing wildfire risk and intensity, the project appears unlikely to accomplish this. Humid valley bottoms, where these harvests are expected, carry lower fire risk than trees killed by fire in the uplands. Salvage logging is an incentive to remove larger trees with less decay.

The case has not been made that this improves forest habitat. Salvage logging often leaves areas in worse shape than we found them and is not well supported by current science. In Roadless Areas where there are opportunities to expand wilderness boundaries, salvage logging will only degrade their current condition.

[bull] The Forest Service should not permit salvage logging in Roadless Areas.