Data Submitted (UTC 11): 12/18/2020 8:00:00 AM
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Comments: [From attachment "Twisp EA comment"]

December 18, 2020

Kristin Bail, Forest Supervisor

c/o Eireann Pederson

Methow Valley Ranger District

24 W. Chewuch Road

Winthrop, WA 98862

Dear Supervisor Bail:

On behalf of The Wilderness Society (TWS), we thank you for the opportunity to comment on the draft environmental assessment (EA) for the Twisp Restoration Project. TWS is a national non-profit environmental organization dedicated to uniting people to protect wild places. As you know, we are an active participant in the North Central Washington Forest Health Collaboration (NCWFHC) and have been involved in several restoration projects in the Methow Valley Ranger District, including the Mission Restoration Project.

Our review of the Twisp EA has focused primarily on the project[rsquo]s consistency with the Northwest Forest Plan, the Roadless Area Conservation Rule, and the Okanogan-Wenatchee Restoration Strategy. As discussed below, we have several serious concerns about apparent misinterpretations of or departures from these three important Forest Service policies.

I. Northwest Forest Plan

A. Cutting 80-Year-Old Trees in Reserves

First, we question whether an amendment to the Northwest Forest Plan (NWFP) is truly needed to allow harvest of trees over 80 years within Late Successional Reserves. As pointed out below, the Plan[rsquo]s prohibition on cutting 80-year-old stands only applies to forests located on the westside of the Cascades [ndash] not to the Twisp Project area in the Okanogan-Wenatchee National Forest, which is located entirely on the eastside of the Cascades.

The EA incorrectly assumes that the NWFP[rsquo]s 80-year standard applies to the LSRs in the Twisp Project area:

[ldquo]One NWFP S&G would be amended to allow harvest in up to 6,982 acres of stands over 80 years old to meet Needs # 2, 3, and 4:

NWFP C-12: There is no harvest allowed in stands over 80 years old.[rdquo][1]

However, the NWFP clearly states that the 80-year standard only applies to LSRs on the westside of the Cascades and that timber harvest in stands older than 80 years is allowed in LSRs east of the Cascades. Following are the relevant excerpts from the NWFP regarding silvicultural activities in LSRs:

[ldquo]Activities permitted in the western and eastern portions of the northern spotted owl[rsquo]s range are described separately below[hellip].

West of the Cascades [ndash] There is no harvest allowed in stands over 80 years old[hellip].

East of the Cascades [hellip] - Given the increased risk of fire in these areas due to lower moisture conditions and the rapid accumulation of fuels in the aftermath of insect outbreaks and drought, additional management activities are allowed in Late-Successional Reserves[hellip].[rdquo][2]

Since the 80-year standard does not apply to the Twisp Project, it seems unnecessary and inappropriate to adopt a project-specific amendment to the NWFP[rsquo]s standards and guidelines for LSR management. Instead, the Forest Service just needs to follow the considerably less restrictive guidelines on pages C-12 and C-13 of the NWFP that are specifically designed for eastside forest LSRs.

B. Firewood Gathering in Reserves

Second, it is unclear whether or why a project-level amendment is needed for firewood gathering in Late Successional Reserves. The NWFP allows firewood gathering in Reserves in certain situations, including [ldquo]in recently harvested timber sale units where down material will [hellip] pose an unacceptable risk of future large-scale disturbances.[rdquo][3] According to the EA, this NWFP guideline [ldquo]would be amended to allow fuelwood gathering on up to 936 acres within LSRs to meet Need #4.[rdquo][4] Need 4 is to [ldquo][m]odify the structure, composition, and patterns of forest stands within and adjacent to the wildland/urban interface (WUI) to reduce and/or maintain fire intensity and the risk of crown fire initiation[hellip].[rdquo][5] The EA further explains, [ldquo]Personal fuelwood gathering typically removes coarse woody debris (woody material >3 inches in diameter) from the forest floor. This treatment reduces surface fuels, which would generally result in lower expected fire behavior.[rdquo][6]

The EA does not provide a satisfactory explanation why the NWFP guideline that allows for firewood gathering in Reserves to reduce the risk of wildfires would not apply to the kind of firewood gathering that the Forest Service proposes in the Twisp Project. Would the firewood gathering not take place in recently thinned timber sale units? Is the wildfire risk in the Twisp Project not considered to be [ldquo]unacceptable[rdquo]?

The Forest Service should only amend the NWFP when there is a demonstrated [ldquo]need to change the plan.[rdquo][7] Given the existing high wildfire risk in the Twisp Project area, the EA does not demonstrate that a departure from the NWFP is needed to permit fuelwood gathering in the Reserves.

II. Roadless Area Conservation Rule

A. Timber Cutting

The Roadless Area Conservation Rule prohibits tree cutting and removal within Inventoried Roadless Areas (IRAs), with some exceptions.[8] For the exception relevant to the Twisp Project, the tree cutting must be limited to [ldquo]generally small diameter timber.[rdquo] Furthermore, any tree cutting or removal [ldquo]is expected to be infrequent.[rdquo][9]

Alternative 2 proposes to cut, sell, or remove trees on up to 4,003 acres in the Sawtooth IRA, including 698 acres of commercial overstory thinning, 70 acres of firewood salvage, and 20 acres of overstory thinning in IRA Riparian Reserves, along with 3,282 acres of non-commercial understory thinning. The commercial overstory thinning and firewood salvage would cut and remove trees up to 16 inches in diameter, while the non-commercial understory thinning would be limited to trees less than 10 inches in diameter. The EA states that these activities in the IRA are allowed by the Roadless Rule[rsquo]s exception for timber cutting to [ldquo]improve threatened, endangered or sensitive species habitat.[rdquo][10]

We are concerned that allowing harvest of trees up to 16 inches in diameter on 788 acres in the IRA may be inconsistent with the Roadless Rule[rsquo]s allowance for cutting only [ldquo]generally small diameter timber.[rdquo] The EA does not explain how the Forest Service determined that trees up to 16 inches DBH in stands targeted for commercial treatments qualify as [ldquo]small diameter timber,[rdquo] while 10 inches is considered the appropriate diameter limit for non-commercial thinning treatments.[11] The Roadless Rule does not allow for diameter limits to be increased in order to make thinning treatments commercially viable.

We suggest that -- absent a clear, science-based rationale for cutting trees up to 16 inches DBH -- the Forest Service should use 10 inches as the upper limit in its definition of [ldquo]generally small diameter timber,[rdquo] while allowing some larger trees to be cut where necessary to achieve ecological objectives.

B. Road Improvements

The Roadless Rule generally prohibits road construction and reconstruction in IRAs.[12] The Rule defines road reconstruction to include road improvements.[13]

Under Alternative 2, [ldquo][a]pproximately 0.9 miles of unauthorized roads would be improved to the minimum extent necessary for safe use during log haul, then decommissioned afterwards.[rdquo][14] Alternative 2 would decommission a total of 2.4 miles of roads in the IRA (1.4 miles of unauthorized roads and 1 mile of closed roads).

We are concerned that the proposed improvement of 0.9 miles of unauthorized roads in the IRA may be inconsistent with the Roadless Rule. The Roadless Rule prohibits road improvements in IRAs with limited exceptions, and the EA does not claim that the Twisp Project qualifies for any of the Rule[rsquo]s exceptions. Therefore, we strongly recommend eliminating IRA road improvement work in the Twisp Project. We support the proposed road decommissioning in the IRA.

III. Okanogan-Wenatchee Restoration Strategy

As a member of the North Central Washington Forest Health Collaborative, The Wilderness Society strongly supports the Okanogan-Wenatchee Restoration Strategy because it is a scientifically sound blueprint for restoring eastside forest ecosystems that have ecological integrity and are resilient to climate change. We endorse the comments of the NCWFHC, Conservation Northwest, and Methow Valley Citizens Council regarding the Forest Service[rsquo]s application of the Restoration Strategy in developing the Twisp Restoration Project and the Draft EA. In addition, we offer the following comments on three issues relating to the Restoration Strategy: large tree removals, road construction and decommissioning, and designation of a new ATV route.

A. Large Tree Logging

The Okanogan-Wenatchee Restoration Strategy emphasizes the ecological significance of old and large trees and the need for their restoration, saying, [ldquo]Old and/or large trees are ecologically important to dry and mesic forest ecosystems. There is a lack of old trees on the OWNF. Large trees are most resilient to fire disturbances and provide important habitat functions when live, and as snags or downed wood.[rdquo][15]

The Restoration Strategy defines two categories of large trees based on their diameter sizes. [ldquo]Large[rdquo] trees are ones that are 20-25 inches in diameter, while [ldquo]very large[rdquo] trees are greater than 25 inches in diameter.[16]

The Draft EA defines large trees differently. According to the treatment descriptions in Appendix A, [ldquo]large[rdquo] trees are greater than 25 inches in diameter,[17] which is 5 inches larger than the definition recommended in the Restoration Strategy. The Draft EA labels trees between 16 and 25 inches in diameter as [ldquo]medium[rdquo] trees.

The difference in large tree definitions is very significant because under Alternative 2 [ldquo]large[rdquo] trees will generally be protected, whereas [ldquo]medium[rdquo] trees will mostly be eligible for logging. Thus, trees between 20 and 25 inches in diameter, which the Restoration Strategy recommends protecting, would instead be routinely cut down and removed as part of commercial timber sales across thousands of acres in the Twisp Project area. Even trees up to 30 inches in diameter could be logged if they are located in the Matrix and are too close to other large [ldquo]preferred[rdquo] trees.[18]

We strongly recommend that the Forest Service use the recommended definition in the Restoration Strategy and protect trees over 20 inches in diameter, except in rare instances where cutting larger trees is environmentally beneficial or necessary for public safety.

B. Road Construction and Decommissioning

The Restoration Strategy highlights the ecologically harmful effects of roads on both aquatic and terrestrial ecosystems. As summarized in the Strategy:

[bull] Roads affect aquatic environments by blocking fish passage, simplifying stream function, altering sediment delivery, and increasing fine sediment yields.

[bull] Roads and road networks affect wildlife habitats and can result in road-related mortality. Fragmented habitats cause wildlife to avoid, or be displaced from, areas adjacent to roads.

[bull] Generally, as the density of roads increases within a watershed, the quality of aquatic and terrestrial habitats decreases.[19]

Despite these damaging impacts, Alternative 2 proposes to build 7.7 miles of new permanent roads, including 4.9 miles of new roads in the Canyon Creek, Cow Creek, and Alder Creek watersheds to provide long-term access for thinning treatments.[20] In addition, another 14.2 miles of temporary roads would be built for log truck use, and 8.7 miles of unauthorized roads would be used and added to the permanent road system.[21] We urge the Forest Service to scale back the amount of road building as much as possible [ndash] particularly the 7.7 miles of new permanent roads.

On the other hand, we strongly support the proposed decommissioning of 41.4 miles of existing system roads and 42.9 miles of unauthorized roads, which would eventually reduce the total road density in the project area from 2.0 miles/sq. mile to 1.4 miles/sq. mile under Alternative 2.[22] This reduction in road density would significantly improve the integrity of aquatic and terrestrial habitats, as recommended by the Restoration Strategy.

C. ATV Route Designation

The Restoration Strategy cautions against combining non-restoration actions with restoration activities in a single project and environmental assessment.

To avoid the appearance of a [ldquo]big gulp[rdquo] Environmental Assessment (EA), it is critical that each part of the proposed action has a clear restoration objective as part of the overarching goal of landscape resilience. It is also important to emphasize the integrated, multiple resource approach of this Strategy. As such, actions that do not contribute to ecological restoration should not be included in the EA, even if they occur within the project area.[23]

Yet, Alternative 2 does just that by including an environmentally damaging proposed ATV route designation in the proposed action. We recommend that the ATV route designation issue be considered and decided through another planning process separate from ecological restoration.

IV. On-going Public Engagement

We are concerned that the current NEPA process will be the final opportunity for the public to comment, object, or otherwise engage in the design and implementation of the Twisp Project. The Twisp Project appears to be the largest and most aggressive landscape-scale restoration project that the Forest Service has ever proposed in the Methow Valley Ranger District and perhaps the entire Okanogan-Wenatchee National Forest. Furthermore, the Forest Service is using a [ldquo]condition-based[rdquo] approach toward project planning in much of the project area, meaning that there is considerable uncertainty about where and how some of the vegetation management activities will actually take place. In addition, there is a high level of interest and concern among local residents, as evidenced by the exceptional amount of public response to the Draft EA to date and the demand for extending the comment period.

We strongly encourage the Forest Service to consider providing additional opportunities for public engagement in planning and implementing the Twisp Project, including through a staged decision-making process. According to the EA, the Twisp Project[rsquo]s logging activities will likely be implemented in five phases, stretching out over a 15-25 year period.[24] Under this phased approach, it would seem to make sense to provide opportunities for the public to participate during each of the five phases, including through collection and analysis of new information as well as normal comment and objection opportunities at each phase. Other options to consider include an adaptive management model used in some other national forests and the [ldquo]determination of NEPA adequacy[rdquo] authority that the Forest Service recently added to its NEPA regulations.

Thank you for considering The Wilderness Society[rsquo]s comments.

Sincerely,

Megan Birzell

Washington State Director

Mike Anderson

Senior Policy Analyst

[1] EA, p. 46.

[2] NWFP, Standards and Guidelines, p. C-12 (emphasis added).

[3] NWFP, Standards and Guidelines, p. C-16.

[4] EA, p. 47.

[5] EA, p. 11.

[6] EA, p. 47

[7] 36 CFR 219.13(b)(1).

[8] 36 CFR 294.13(a).

[9] 36 CFR 294.13(b).

[10] EA, p. 127, citing 36 CFR 294.13(b)(1)(i).

[11] Notably, Washington DNR uses three tree size classes to evaluate forest structure and composition in its

eastside forest health landscape assessments: large trees are greater than 20 inches, medium trees are 10-20 inches, and small trees are less than 10 inches in size. See WA DNR, Forest Health Assessment and Treatment Framework, p. 27. https://www.dnr.wa.gov/publications/rp_2020_fh_report.pdf.

[12] 36 CFR 294.12(a).

[13] 36 CFR 294.11 [definition of [ldquo]road reconstruction[rdquo]].

[14] EA, p. 127.

[15] OWNF Restoration Strategy, p. 31.

[16] OWNF Restoration Strategy, p. 103. Notably, Washington DNR uses three tree size classes to evaluate forest structure and composition in its eastside forest health landscape assessments: large trees are greater than 20 inches, medium trees are 10-20 inches, and small trees are less than 10 inches in size. See WA DNR, Forest Health Assessment and Treatment Framework, p. 27.
https://www.dnr.wa.gov/publications/rp_2020_fh_report.pdf.

[17] EA, p. 131; see also p. 68.

[18] EA, p. 133.

[19] OWNF Restoration Strategy, p. 31.

[20] EA, p. 111.

[21] EA, p. 57.

[22] EA, p. 79.

[23] OWNF Restoration Strategy, p. 57 (emphasis added).

[24] EA, p. 28. [ldquo]Commercial harvest associated with these treatments would likely occur in approximately five phases in this project, with each phase typically implemented over a three to five-year period, or over the next 15-25 years.[rdquo]