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Comments: *The Twisp proposal allows for the cutting of large trees, departing from the Forest Service's 2012 Forest Restoration Strategy. The proposal appears to deviate from the 2012 Restoration Strategy without explanation. Most notably, while the current written direction for the Okanogan Wenatchee National Forest discourages cutting large trees over 20 inches in diameter, the Twisp project proposes cutting trees up to 30 inches, while acknowledging large and old trees are deficient within the project area. This contradicts the Forest Service's own guidance.

Further, monitoring and evaluation are essential to successful forest restoration yet are not included in the proposal, although the 2012 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:

Follow the direction outlined in the 2012 Restoration Strategy and avoid logging trees over 20 inches in diameter. Logging of any larger trees should be described as a rare exception to the rule.

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

*Twenty-two miles of wheeled ATV road access are included in this forest restoration proposal. New ATV Access along the Upper Twisp River doesn't belong in the 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.

Remove the ATV access component of the project and consider this proposal in a separate process.

*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 wilderness 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.

Do 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 prohibiting new road construction and ground disturbing activities.

*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 before, 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.

Do not permit salvage logging in Roadless Areas.

*A project of this size and duration deserves much more scrutiny to make sure it is done well. The Twisp proposal contains many new concepts which will require time for the stakeholders to understand and comment on intelligently. There is a need for site visits and more public meetings over time to learn about what is being planned and how the public will be impacted. Public comment should not be a one-time opportunity.

Issue separate decisions for each of the five phases of the project and allow for public input at each phase and decision point.

Incorporate an adaptive management strategy that allows course corrections along the way as new information becomes available.