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Comments: Comments on Twisp Restoration Project
Submitted electronically by Isabelle Spohn
12/18/2020

INTRODUCTION:

Thank you for the opportunity to comment and for the work you have put into this and into communicating with the public.

We still have not learned how to use the wiser path is to join with nature rather than to attempt to control her. Take, for example, the events following the mega fires of 1910, which spurred the UFSF into suppression of nearly every fire that could be identified from the numerous fire lookout towers that were eventually constructed. Follow forward the chain of inappropriate human overreaction to disaster until today. I wish to emphasize that I am an advocate for prescribed burning and effective thinning when done properly and when necessary, but I cannot support this project as written and hope that modifications will be made.

A popular mantra at this point regarding wildfire is the "epidemic of trees," upon which this EA seems to be based. As a USFS fire lookout for 10 years, I utilized the tri-fold photographs from the 1930's in order to "learn the country" from each lookout. The photos seemed at first to support the theory of the "epidemic of trees," in comparison with the appearance of the country in current times, as the cause of mega fires. However, I now realize that the history of wildfire overall renders that theory questionable. The mega fires of 1910 cannot be blamed upon fire suppression and mismanagement, since at the time of the massive fires that charred 3.5 million acres, significant suppression of wildfire had not yet occurred. However, significantly poor logging practices had occurred and weather, just as it does now, played its part with dry conditions, low humidity, and wind.

Rather than jumping on the bandwagon of more logging and mechanical work to reduce the number of trees quickly, I hope that working with nature should make more and more sense as lower impact interventions are developed by utilizing strategies such as judiciously allowing some fires to burn at the right time, chipping of small diameter wood and branches, removal of ladder fuels in preference to removing a large old growth tree, working with and encouraging Firewise communities, carefully executed prescribed burning without unnecessary mechanical disruptions of surface soils and the increased impacts of the "edge effect, " investing in interventions such as biochar plants, and avoiding impacts upon other living things. We are still in the stage of hypothesis and experimentation regarding long-term effects of our actions, and committing to 3 decades of industrial-scale "treatments" without further knowledge and resources does not seem wise. It reminds me of the rush to fire suppression early in the 1920's and 1930's.

Restoration is a worthy cause, but considering the extent of the project and the decades of ecological disruption it involves, I believe the Methow Ranger District is in over its head on this one. Experimentation with questionable funding and enforcement at this point is not a good strategy. We are not going to be able to regulate the wind, which is an obvious result of climate change and a recognized reason for recent mega fires that ripped through communities regardless of completed restoration projects. Witness the destruction in the Chiliwist community, the first Firewise community in Okanogan County, during the Okanogan Complex. Most of the acreage burned since 2014 has involved fewer trees than grassland and shrub-steppe and these fires have moved many times more rapidly than they would have through the trees.

These days, attaching the word "restoration" to a project seems to make it automatically OK. That type of spin is neither honest nor workable. A more cautious approach with periodic scientific analysis and based more upon working with fire rather than against it makes more scientific and practical sense. Let's learn from past errors of humanity by erring on the side of caution when the stakes are this high.

I urge the decision-makers in this process to carefully consider the adequacy of this document, considering:
*Lack of adequate public input due to readability of the document within a short time
frame, leading to .....
*Lack of public trust and less likelihood of public cooperation
*Inadequacy and lack of completeness in various specialists' reports.
*Significant omissions in the analysis of uses and effects of fire.
* Inclusion of more ATV use and more grazing by cattle, neither of which are elements of "restoration."
*Failure to adhere to recommended guidelines for restoration and directives of theForest Plan.
*Additional miscellaneous considerations.

MY RECOMMENDATION: I propose that the more realistic approach would be a Programmatic EIS with a full range of Alternatives and a schedule for monitoring the impacts after each stage of the project. Due to the shared boundaries, the overlapping of many issues, and the relationship between the two projects referred to in this document, the EIS analysis should include the adjoining Mission Project as an important and integral part of the same landscape with recently shared fire history.

Both projects are clearly part of the same action and are interrelated, as noted in the EA itself many times, in statements too numerous to mention (see 2 examples below.) Residents, wildlife, and fisheries of the Twisp River drainage and adjoining Libby Creek drainage suffered through the same Crescent Fire, and together they present a full picture of the affected landscape.. These two projects are joined at the hip. We are talking about activities and impacts that could last for 3 decades. An EA is not sufficient to address the magnitude of either of these proposed endeavors. Here are only two of the multiple examples of the interrelationship:

Example #1: Draft Wildlife Report, P. 30: "If the Mission project were to be implemented at the same time as the proposed Twisp Restoration project the effect to the percent core area in the Libby and Upper Twisp River BMUs would decrease slightly (Table 9).
Example #2: 5.2.4 - "Cumulative Effects - Alternative 2: Past, Present, and Reasonably Foreseeable Activities Relevant to Cumulative Effects Analysis: Past activities that contribute to the existing condition are described under Alternative 1. Present and reasonably foreseeable future actions that affect sediment and overlap with the spatial and temporal bounds described in section 4.3 include:
* Grazing
* Prescribed burning
* Firewood gathering
* Recreation (developed & dispersed camping, boating, hiking, biking, hunting, skiing, snowmobiling, fishing, etc.)
* Road maintenance
* Mission Restoration Project: commercial & non-commercial thinning and prescribed fire
* Mushroom gathering in Crescent Fire perimeter
* Aquatic habitat restoration in the Twisp River drainage and in Mission Restoration project (including private lands)

INADEQUACY OF THE DRAFT EA AS A BASIS FOR RELIABLE DECISION-MAKING:

A: READABILITY OF THE DOCUMENT, AFFECTING ADEQUATE PUBLIC PARTICIPATION: Reading level of average US Citizen is 7th or 8th grade level, according to The Literacy Project and other sources. I myself

have a graduate degree, and I find this document extremely difficult to read. It is overly and unnecessarily complicated: Example, 5.2.3 p. 23, Draft Fire, Fuels, and Air Quality Report: "Grazing and adjacent landowner thinning and prescribed fire emissions represent the only present or reasonably foreseeable actions within the spatial or temporal context of the effects analysis that would affect the resource indicators used in the analysis. " Can you really imagine a 7th or 8th grader understanding that? Or even a high school student? I myself can't understand it without research. Not only is the choice of vocabulary unnecessarily difficult, but the EA requires the reader to cross-reference numerous accompanying documents in order to interpret what is being said. It begs the question "is this document REALLY designed to inform the public and allow for their participation?"

B: LACK OF PUBLIC TRUST AND SUBSEQUENT LOSS OF PUBLIC COOPERATION:

*See Susan Crampton's letter (for the Dec. 18th comment period) for her suggestions as to how the community might have been better included in the process - and hopefully will be in the future. I concur with her points.

*Travis Paveglio Analyses: Along with Susan's suggestions, see https://www.fs.usda.gov/treesearch/pubs/58814 for a study authored by Travis Paveglio for tips on how the USFS might approach various groupings of communities classified by socioeconomic parameters in regards to mitigations/restoration projects involving the current fire situation in our nation. Some consideration by the TRP team as to how to approach the related communities along these lines would have been helpful and could be useful in the next steps.

See also the letter of the Buttermilk Firewise Community by Bob Rivard and Emily Warn in regards to the wisdom of including their community in any further steps in the process. (Letter for the 12/18/2020 comment period.) The letter highlights the importance of utilizing the knowledge of local people who have accumulated a great deal of knowledge of this forest over many years.

Concerns of adjacent property owners who have already taken significant measures: NCCC and I ask: Are there alternative ways to address concerns of adjacent property owners who have taken significant voluntary measures to limit their exposure within their own lands? What are the most cost effective options of achieving their security? Ingress and egress? Air attack? Warning systems? Working with the County's Community Wildfire Protection Plan (a pre-Carlton Complex document, long overdue for revision) and the Methow CWPP would be helpful, particularly in regards to ingress/egress and evacuation.

I do want to thank the USFS, however, for including the general public to the degree they have, even though it has been minimal, rather than working with solely an "insider" group of organizations. Not everyone belongs to an organized group. I did have some concerns over a recent zoom meeting that was not open to the public. I appreciate the reading room and availability of the relevant documents, although they are difficult to find without significant time and effort (which most of the public does not have, particularly during this pandemic and election year crises.)

C) DEFICIENCIES OF CERTAIN SPECIALISTS' REPORTS

Draft Transportation and Travel analysis, Draft Economic Analysis, and Draft Recreation Reports: Please see the submission of Emily Warn and Bob Rivard regarding the inadequacy of these 3 reports. I concur with their opinions with the exception that the project will disrupt recreation for more than 3-5 years, since it is referred to frequently in the EA as a project possibly lasting up to 30 years (see comment letter of Dr. Don Johnson: [Project implementation periods for the TRP and MRP are respectively 30 years and a 15-year repeated cycle. Those plans provide for long-term loss of undisturbed habitat for at least 30 years.]

* Draft Fire, Fuels, and Air Quality Report: my own comments are below:
Air Quality: The Report is deficient in its analysis of the Air Quality impacts, such as the actual health impacts of

woodsmoke which contain not only PM 2.5 particulate matter but in addition, highly carcinogenic emissions including benzene, benzo(a)pyrene, and dibenz(a,h)anthracene. The analysis must include these impacts upon humans. A cursory projected guess at how USFS burning might in the long term compare over 3 decades with projected possible wildfires is not sufficient (and how was the likely impact modeled for the Twisp River drainage? My guess is that it was not modeled at all.)

Additional deficiencies re Air Quality:
Although the Sawtooth Wilderness is not included with other Wilderness Areas as subject to Class 1 Air quality standards (because it was created later than 1977) this does not mean that visibility and regional haze are not important issues to the areas and wilderness encompassed by the TRP. How will visibility and regional haze be addressed, particularly in view of the proximity of this important and popular Wilderness Area to the TRP?
How will PM-2.5 emissions affect the status of the Methow Valley as an attainment area or a non-attainment area under Washington State law, and what would be the regulatory consequences to the community of such a change?
How will a burning operation be monitored as to the Air Quality impacts to residents in the area, and what will be the remedy in case of unsafe levels and impacts to humans and wildlife?
What will be the remedy if monitoring shows that Washington State Air Quality health standards for PM 2.5 are being violated due to the cumulative impacts of woodstoves, wildfire, transportation, and USFS "treatments?"
The annual arithmetic mean concentration of P M-2.5 must not exceed 12.0 µg/m3. The three-year average of the ninety-eight percentile 24 hour average concentration of PM-2.5 must not exceed 35 µg/m3.
https://www.doh.wa.gov/Portals/1/Documents/1500/EH-AQ2014.pdf, p.2
Why are the benefits of biochar, now being modeled in the Methow by the C6 Forest to Farm project (Tom and Gina McCoy) not given significant mention as a possible mitigating factor? This biochar plant does not involve the dangerous emissions of woodsmoke that outdoor burning produces. It seems that including such an intervention would be a positive for this analysis.

Fuels: Fuel reduction by elimination of ladder fuels as compared with the logging of larger trees is not adequately addressed.

DRAFT WILDLIFE REPORT:
The "edge effect."
I find no mention of the well-known "edge effect," although with all the new roads plus existing roads there are many "edges" involved with this enormous project. According to edge effect parameters, at the forest border wildlife species within 300 feet (at the very least) are affected. Edge effects promote the growth of opportunistic species, and forest fires are a common result of edge effects because the edge becomes dried out due to increased light availability. With this huge project, it would be most important to discuss the increased edge effect in relation to at least sensitive or endangered flora and fauna, and how it might influence the spread of wildfire.

Wolves - The significance of the Lookout Pack historically and locally is not discussed at any length. The pack was decimated by human depredation not long after it was the first wolf pack to introduce itself to the Pacific Northwest in recent history. Less available prey (due to project activities) along with more grazing opportunity will encourage more wolf/human interaction, which normally results in more predation upon livestock and pets and more complaints from the alarmed human population - which normally results in death of wolves by human hands. This pack frequents the Twisp River drainage as well as the Gold Creek and Libby Creek drainages. The report is deficient in this arena. (This is also one more reason to include the Mission Project in a Programmatic EIS.)

The EA continually states that the long-term effect is more habitat for wolves. But what if the Lookout pack doesn't make it that far in time? Wolf/human interaction will increase with the increased human activity relatively early on. In addition, the wolf has recently lost its protection under the ESA. The resultant death of either the alpha female or alpha male could decimate the pack, as it has before. In these cases, it is the wolves that lose.

PLEASE ADDRESS THIS ISSUE!

Trapping for fur: With the increase in human exposure by the creation of more trails and new roads resulting in more risk to wildlife, why is fur trapping not discouraged as a mitigation?

DRAFT RANGELAND REPORT
Please consider the comments of (Dr. Don Johnson, Retired Fisheries Professor), below:

*Management Area 14: The goal of this MA is to provide a diversity of wildlife habitat, including deer winter range, while growing and producing merchantable wood fiber. MA14-11A: Eighty-five percent of the annual available browse on winter range shall be for wildlife and 15 percent for domestic livestock." [Comment: Cattle will not move out of this shady, green riparian/wetland area after they've eaten 15% of the forage. There is no history to support a belief that the Forest management staff or Allotment permittee will end grazing in this area after 15% utilization is reached.]

*MA 14 and 25 are within the Lookout Mountain Allotment(LMA) and the MRP.
[Comment: The Draft Revised AMP (2008) was a driver of the MRP, named for the Mission Creek sub-watershed. It called for a timber sale that would open the overstory and increase "transitional forage". The maturing forest has been shading out the cattle forage created by the last Libby Creek timber sale. The reduced AUMs and permittee resistance to necessary management requirements led to termination of the LMA permit. The Little Bridge permittee had his AUMs reduced and the reduced AUMs were moved to the LMA; for several years that permittee has requested non-use.

The timber sale necessary to save the LMA was a drive of the MRP with a restriction of "changes, eliminating, or reducing grazing is outside of the scope" of that project or this TRP. The MRP created timber sale in 2016 has not found a buyer and has been challenged by a lawsuit. This has, apparently, led to an expansion of the original "restoration" plan (MRP) to the creation of this TRP (2019) including the Lookout Mountain, Little Bridge, and Wolf grazing allotments. This unites the TRP with the adjacent Map and should require investigation of long-term adverse effects with an EIS.)

Draft Hydrology Report: Please consider the comments of Dr. Johnson, which were already sent to the USFS before this document was submitted, for the 12/18/2020 comment period. It is lengthy and detailed but includes very important material as to Fisheries, Hydrology, the Forest Plan, Water Quality, Sedimentation, and more. ?

D) Significant omissions in the overall analysis of uses and effects of fire.

*The analysis should include the interrelationship between the Okanogan County Community Wildfire Protection Plan and the Methow CWPP and the proposed TRP in regards to the Twisp River and related drainages (such as Libby Creek and Wolf Creek.) It should be noted that these plans are pre-Carlton Complex and long-overdue for review. Ingress and egress issues would obviously need cooperation with the Forest service in the area of the TRP, especially if operations in crucial routes of ingress/egress occur simultaneously with wildfire or "treatments."

*When should fires be suppressed, and when should they be allowed to burn? This is not addressed. Taking advantage of nature's processes should be a basic element of this plan.

* Alternatives to bulldozing lines on top of most ridges for containment of prescribed burns should be considered and discussed. For example: Why are there 7 ft. bulldozed lines proposed for the tops of ridges to contain prescribed burns? Shouldn't a prescribed burn be backed down the slope? In this case, if done properly, a handline to mineral soil should be effective to contain the first and several successive ignitions. After that, if

weather conditions are correctly calculated and the burn is done at the right time of day, , the ridgetop should hold without a problem with a hand line. The initial ignition would be set downslope and close to the hand line , and each successive ignition would back on up the slope into the burned area above it. That was the procedure used when I worked with the USFS doing prescribed burns as an employee. The reason for this question: I know of at least 3 cases during fires in the past decade in which the USFS and/or DNR ignited "back burns" or "burnouts" that nearly involved loss of human life and definitely involved loss of private property. One of these was my property, in which the Buckhorn fire had nearly died in late September during highly humid conditions, at the tops of a steep ridge high above my property. We trusted the USFS to back the fire down the slope as they said they had planned; but that plan was abandoned and the bottom 1/3 was ignited on my property instead, from the bottom of the slope. This resulted in the total destruction of huge old growth forest and pines, while the small "dog hairs" survived (this was apparently due to presence or absence of pine needle build-up on a steep slope.) Now, 10 years later, the area is full of brush and large downed old growth - and apparently a fire hazard. Does the local USFS district still know what it is doing with prescribed burning? Do they have enough trained personnel to accomplish the amount of prescribed turning that is planned? What procedures would be followed? The location of these proposed 7 ft. Fire lines at the tops of the ridges indicates that perhaps the USFS plans on torching from the bottom (or from a helicopter) rather than the top of the slope and would thus need a 7-foot dozed line for containment. These slopes are very steep. The utmost caution is necessary so as not to create more destruction and future fire danger - such as not torching the burns from the bottom of a steep slope.

Much of the area under discussion has already been "treated" by recent wildfires regarding wildlife habitat. A good analysis would include how quickly various types of habitat regenerates after fire, including aquatic habitat in degraded areas - especially for ESA listed species. (Also asked by NCCC.)

Is this planned action an action that is too late to address large scale fires to come? (Questioned also by NCCC.) How certain is it that new fires for the next 20-30 years can be contained in this area by these measures? This should be a basic consideration in this EA. And what if there is a loss of funding for the USFS in that time frame that does not permit the necessary periodic "treatment" of the "treated" areas 15 years of so after reproduction begins?

E. Inclusion of more ATV use and/or more grazing by cattle, neither of which are elements of "restoration." A restoration project should not include either of these, since they have definite negative effects upon the watershed.

F. Failure to adhere to timber harvest guidelines and tree diameters contained in the Forest Plan. The guidelines in the Forest Plan should be adhered to. These guidelines were formulated with the environment in mind. A "restoration" plan that ignores them is counter to the philosophy of the goals of the Forest Plan. Because there are already a limited number of large trees due to past harvests and fires in the area, I believe the diameter limit of 18-21" is appropriate for promotions of old growth forests.

G. Active forest management has little or no impact upon grasslands and the shrub-steppe community, in which the most rapid spread of mega fires in our area has occurred. In fact, increased logging will bring more grasslands (and grazing) in the the areas of the TRP and the Mission Project, which are intertwined regarding fire. Therefore the type of restoration being considered may be of minimal value in preventing rapid spread of the mega fires. This factor has been glossed over in the analysis.

H. Downed wirelines were a major source of ignition in the burned communities in 13 communities in Oregon very recently, and in the California fires. Coordination with the PUD and encouragement of buried lines should be addressed if the goal is to avoid mega fires.

I. The fact that climate (wind, temperature, relative humidity etc.) controls fire is downplayed in this report. The

emphasis is, in error, upon the "epidemic of trees."

J. Reduction of fuels by reduction of ladder fuels is underplayed.

K. I oppose a trail from Black Pine Lake to Lookout Mountain, which has been proposed in the comments. This summer, the trailhead to Lookout Mountain was crammed with vehicles, including ATV's (illegal on that road.) This trail is ideal for local residents to take visitors or children , or for a short hike themselves. Having a trail to the Lookout from Black Lake would encourage hordes of tourists and groups of campers, along with off-road vehicles such as dirt bikes, for which there is little or no enforcement available. The local District cannot even now keep up with continual violation of ATV's and dirt bikes in the North and Middle Forks of Gold Creek and Lookout Mtn road itself. Havung been the lookout on Lookout Mountain for 5 years, I can attest to the fact that there were continual violations by dirt bikes and related damage to the fragile soils and vegetation on top of the mountain, even years ago. Now it is much worse, even without a maintained trail to Black Pine Lake.

G. Miscellaneous Comments:

Beaver dams: I support the following statement by Dana Visalli in his letter for the December 18th comment period because it reflects my own observations. "The idea of artificial beaver dams in the project area is problematic in that such dams are built in ecologically unstable environments. When a beaver dam is breached or damaged, which occurs every year, the beaver fix it. When a human 'beaver dam' washes out, probably the year after it is emplaced, no human beaver will appear to repair it-we are all too busy to fix the structures of the past. This is the beauty of the natural world: it is self-healing, at no cost to the human community. The primary issue with beaver in the Twisp Watershed today is that grazing by cattle is destroying the ecological base for beaver colonies to exist and persist. Most notably, the cattle eat and trample the young willow and aspen saplings, such that beaver cannot co-exist with cattle grazing in wetlands. And in my experience it is no use building a fence have the time nor the money to revisit last year's projects. Once again, nature will heal the wetland ecosystems if we exclude the inappropriate and destructive forces. And there is no ecosystem more precious or important than a wetland."

Deer Winter Range: Are there management areas that should be included in the materials? Has latest study by WDFW as to deer populations since the Crescent Fire been included in this document and considered?

3. ATV's:
I concur with the following statement by Dave Hopkins because it substantiates my own research on the impacts of ATV's, my observation of ATV violations in other areas of the Forest, and I am familiar with Dave's work: "The harm to the riparian ecosystems and to fish habitat is as troubling to me as the safety and nuisance issues. There are numerous areas in the drainage where ATVs can access riparian areas and the river itself. That this Project proposes to allow skid trails in riparian areas will only exacerbate this problem . As I stated earlier, I was a biological technician on the District for 26 years, from 1990 to 2016. My primary job was conducting stream habitat surveys and fish distribution and spawning surveys. The Twisp River has the highest amount of fluvial bull trout spawning on the District as well as the highest percent of native spring Chinook salmon. A third T & E fish species, summer steelhead, also spawn and rear in Twisp River. I was involved with identifying and monitoring four wheeler use in the river corridors, mostly in the West Fork Methow and Chewuch Rivers but also in Twisp River. The District has spent a small fortune blocking access to the riparian areas and the rivers from motorized use. Vehicles were not only eroding the banks along the river and destroying vegetation but also were riding on the gravel and cobble bars and in the rivers themselves. In my opinion, allowing ATVs in these areas is a "take", and an Environmental Impact Statement should be prepared to address the damage that ATVs are sure to cause, and to mitigate for these damages."

Thank you for the opportunity to comment on this project.

Sincerely Yours,
Isabelle Spohn