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First name: Nicholas

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Organization:

Title:

Comments: Dear Okanogan-Wenatchee National Forest Supervisor Bail,

Thank you for all the time your office has spent in preparing this comprehensive environmental analysis for the Twisp Restoration Project.

I have very recently moved with my wife and young daughter to the Methow Valley to land immediately bordering this Project up Wolf Creek. What pulled me to move to the Methow Valley and raise a family there was the abundant public lands surrounding the Valley, especially in the Okanogan-Wenatchee Forest. In particular, the wild qualities of this landscape appealed to us; I believe these same wild qualities appeal to many living within the Valley or visiting the Valley. The North Cascades remain one of those large connected landscapes that have become increasingly rare throughout the country as humans have steadily fragmented them. Although I see many benefits to the Twisp Restoration Project including the reduction in fire risk, the decommissioning of roads, and the movement towards diverse, resilient forests, I am concerned about some of the impacts of this Project on the short-term and long-term health of the forest.

My first concern is the emphasis on commercial timber production, particularly the cutting of large diameter trees. The Methow Valley is no longer dependent on resources such as timber to maintain its economy. What draws people to the Methow Valley, both to live and to visit, is the opportunity to find a slower pace, watch the comings and goings of wildlife, and engage in human-powered recreational activities. While I support the thinning of smaller trees on the majority of the project to eliminate ladder fuels and provide fire resiliency, old trees over 20" in diameter should be kept. Old trees, especially Ponderosa pines, are remarkably fire resistant and essential to building the mature, resilient old-growth forests that the Forest would like to move towards in the future.

The current written recommendation for the Okonogan-Wenatchee National Forest discourages the cutting of trees over 20". While in west-side climates, trees over 20" might be considered young and small, in the dry east side climate of the Cascades, these trees grow slowly and should be preserved. A study last year in the Journal of Forestry (<https://academic.oup.com/jof/article/117/2/128/5321900>) found that due to fire exclusion there was a higher likelihood of allowing harvest of a tree older than 125 years old due to fire exclusion (and trees growing slower) if a 21" harvest limit was used. Up to 1 in 5 Douglas Fir or Ponderosa Pine in an East Cascades climate were found to be over 125 years old and under 21" in diameter. Cutting trees between 20" and 30" would cut out many old trees that could take over a century to replace and would have adverse effects on creating the late-seral forest structure that is desired. While logging trees above 20" might give a short-term windfall to the Forest and the local economy, in the long-term it could hurt the most precious resource the Valley has: wild, relatively unfragmented landscapes which, with the necessary and needed proposed thinning and burning, will gradually become older growth forests resistant to fire where diverse wildlife thrive. These healthy forests, especially up the beautiful Twisp River Valley, will continue to draw people from all over the state and country and help to support the local economy in the process.

My second concern is the proposed thinning and logging within the Sawtooth Roadless Area. I think of roadless areas as key buffers between Wilderness and human populated, fragmented areas. These areas are given such designations because they have Wilderness qualities. While Wilderness areas cannot be touched (sometimes to their detriment, but mostly to their benefit), Roadless Areas can be managed. However, they should be managed in a responsible, low impact way befitting their status. There is a Roadless Area not far upstream of where we live in Wolf Creek that provides prime habitat for the mule deer and black bears we've seen wandering the area. Although, I'd like to see this area and other roadless areas in the area thinned to reduce fire risk, I'm concerned about the heavy equipment going into these areas and any new roads (even temporary) that need to be built. I'd

much prefer to see only trees less than 10" cut out of roadless areas for fire mitigation and hand pile burning instead of machine pile burning. Heavy equipment and dragging trees with equipment can have lasting impacts due to compaction of soil and creation of scars that fragment the landscape, something to be avoided in Roadless Areas. These areas can be candidates for Wilderness and shouldn't be disqualified based on impacts from a restoration plan.

I have spent most of the last ten years in western Montana, where logging scars on the sides of mountains are still visible from logging in the 1980s due to the slow regrowth of trees. Although I'm not suggesting the impact of heavy machinery would have as heavy of an impact as 1980s logging practices, I'd prefer to see most of the thinning and burning in these roadless areas done by hand or small machinery to avoid short and long-term impacts to vegetation and wildlife in the area.

Related to this concern, is a concern about commercial harvest and large fuel breaks in old growth forest areas. While it is necessary to provide fuel breaks to address fire concerns, these should be placed in areas that have already been impacted (matrix lands) to keep from cutting and fragmenting mature forests that do take a long time to grow back. As the EA identified, there is a distinct lack of old forest structure in the Upper and Middle Twisp river (only 1.5% remaining). Diseased trees in these areas could be removed but I do have concerns about impacts to such sparse and valuable late-successional forests.

Finally, I have been an employee and now an active Board member of a conservation group in Montana (Great Burn Conservation Alliance) that works closely with the Forest Service on stewarding and protecting a proposed Wilderness. On the two forests in which we work, travel planning has always been separate from any proposed restoration projects. There are numerous concerns around allowing more ATV road access in the Upper Twisp River including impacts on wildlife and the creation of illegal, unauthorized roads (something this Project is working to undo in the Chickadee area). Allowing ATVs in the Upper Twisp River Valley should be a separate issue given due process in the Forest Travel Plan.

Since this project occurs in five stages and will likely take multiple decades, I believe monitoring, re-evaluation and public comment periods should be part of the process. This will give the opportunity to correct course and alter the plan as it unfolds if adverse impacts become apparent.

I do appreciate all the planning that has gone into this Restoration Project. I believe the aquatic restoration, road decommissioning, beaver dam analogs, and stream crossing improvements will all improve the unique habitat of the Twisp River and Wolf Creek watersheds. Understory thinning and prescribed burns will reduce fire risk and improve the forest structure. With the changes outlined above, this Restoration Project could turn into a major success story for improving wildlife habitat while reducing fire risk.

Thank you for taking the time to review and consider my comments on the Twisp Restoration Project.

Sincerely,

Nicholas Littman