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First name: David

Last name: Fluharty

Organization: North Cascades Conservation Council

Title: Board Member

Comments: Mr. Chris W. Furr, Methow Valley District Ranger

Ms. Eireann Pedersen, Project Team Leader

Okanogan-Wenatchee National Forest

24 West Chewuck Road

Winthrop, Washington 98862 December 18, 2020

Re: North Cascades Conservation Council Comments on the Twisp Restoration Draft EA

North Cascades Conservation Council (NCCC) submits the following comments on the Twisp Restoration Draft EA:

Thank you for the opportunity to comment on the Draft EA for the Twisp Restoration. NCCC has worked since 1957 "to protect and preserve the North Cascades' scenic, scientific, recreational, educational, wildlife and wilderness values." Our members enjoy the Twisp River watershed for the purposes outlined in our mission statement above. Based on NCCC's review of the Draft EA and supporting documents and appendices, NCCC strongly objects to the consideration of only two alternatives, i.e., the No Action Alternative (Alt 1) and the Action Alternative (Alt 2).

The public is being told that nothing will be done under Alt 1 and that under Alt 2 the public is forced to commit to a 30-year carte blanche to allow the USFS to perform a wide range of management actions for forest health - ostensibly to reduce likelihood of stand replacing fire, to avoid insect infestations, etc. The extensive interventions under Alt 2 purport to substitute management actions for nature's own self-healing restoration as a result of natural succession, but there is no analysis that compares the outcomes of the two alternatives in the detail that is needed to make an informed choice. The two Alternatives are long lists of management actions with very limited analysis.

The No Action Alt. 1 is probably not tenable under the responsibilities of the USFS to take actions to protect Endangered Species Act (ESA) listed fish and wildlife species. Many of the proposed "no actions" are necessarily part of normal USFS management actions as a multiple purpose management agency and are required as part of the Northwest Forest Plan, Roadless Area Conservation Rule, and the OWNFS Forest Plan Old Growth Protection Allocation, etc. Thus, this really isn't a no action alternative because the agency is required to act and will have funding to implement required actions.

The Action Alt. 2 is such a long list of proposed prescriptions for management actions to be performed over a 30 year period that the public is essentially precluded from performing its oversight role with respect to evaluating the impact of specific management actions. If Alt. 2 had a prioritization and a project timeline associated with management actions, the public some reason to support the management directions. However, there are scant provisions for monitoring impacts, no reliable and predictable mechanism for review and redirection, e.g., climate change, subsequent fires, insect infestations, accidents of management, updated scientific understanding, and no means of assurance that costly/unprofitable mitigation measures will be completed.

Note, for example, that the beneficial effects of natural successional processes operating over 30 years are simply not analyzed for either Alt 1 or Alt 2. Alt. 1 dismisses natural succession as what happens under the no action. This ignores the science behind management in concert with natural succession. Alt 2 substitutes fairly heavy-handed combinations of industrial salvage logging, prescribed burns and mechanical thinning for natural processes under the guise of accelerating natural processes - but the outcomes are quite uncertain.

NCCC argues strongly that a viable third Alternative (Alt. 3) should be designed to prioritize specific "surgical" or "strategic" management actions, to be taken within a 3-5-year time frame, high impact measures most likely to address the identified needs, taking into account existing fiscal constraints, as a minimum starting point. Alt 3 should be adaptive to the rapidly advancing science of forest ecology. The three (or more) alternatives so designed and revised must then be fully analyzed in a comprehensive Environmental Impact Statement (EIS). Given the magnitude of the Twisp Restoration in area, scope, and time, a complete watershed level EIS of a plan that can be delivered is needed. This should be updated at approximately 5-year intervals in order to be adaptive.

If the USFS is not prepared to develop this type of Alt 3, NCCC in consultation with others is willing to draft an independent alternative along the lines outline.

A determination that the Twisp Restoration project will have no significant impacts would lack credibility. Even the limited analysis provided in the EA claims that there will be very strong positive impacts on forest health and that the negative environmental impacts will be minimal or minimized by management intervention, without substantiation. Rationales for developing an Alt 3 can be cited:

1. Neither of the alternatives has undergone a risk analysis and there is no backup plan for unanticipated events or impacts.
2. There is very limited monitoring proposed of the effects of management interventions.
3. According to the emerging science of dry forest restoration, e.g., the USFS Fire and Fire Surrogates Study, fuel reduction and forest restoration treatments must be repeated. "Once is not enough" is what the science is telling us. The Action Alternative does not address the strong research and observable fact that "once is not enough". (See PNW Research Station 2008, Science Findings, Issue 106, Portland, OR.)
4. Frequent reference is made to "uncharacteristic" historical forest condition but this differs across the Twisp Watershed. These differences are inadequately identified. There is very little definition of the end-state goals intended for different forest sites and conditions to be achieved over the 30-year time frame of the Project.
5. Principles have been articulated for prioritization of dry forest restoration using fire, i.e., "Historical low-severity fire regimes are the highest priority for treatment. Mixed-severity fire regimes are of intermediate priority and high-severity fire regimes are of lowest priority." (Brown, R., J. Agee and J. Franklin, 2004, Forest Restoration and Fire: Principles in the Context of Place, Conservation Biology 18:4 903-912. Alt 2 seems to treat high-severity fire regimes as highest priority - just the opposite of the scientific recommendations.
6. While NCCC and continue with further arguments against the Twisp Restoration Project as is, we find such effort to be moot given that the plan is fatally flawed. NCCC finds the most compelling rationale for re-starting this process in the economic report for the project. The Congressional funding process and the Agency budgeting issues are realities that neither the Methow Valley Ranger District nor the Okanogan-Wenatchee National Forest can predict. Given that situation, the commitment to an undefined sequence of actions through the Draft EA for a period of 30 years is not a responsive or responsible planning process under NEPA or other statutes that require management actions. Therefore, NCCC cites extensively the economic specialist's analysis as presenting a positive way forward, as explained in point number 7 below.
7. NCCC agrees strongly with the brief statements of the Economic Specialist Report's key point that without dedicated funding from Congress, the Actions proposed for Twisp Restoration cannot be implemented. Even the most ambitious commercial logging of large trees is vastly insufficient to cover the cost of the 30-year project and defies the purpose of restoration. Thus, a prioritized and strategic Action Alternative that takes into account fiscal and other limitations is needed. To illustrate this point NCCC quotes at length from page 13 of the Draft EA Economic Specialist Report.

With respect to Alt 1. "Since there are no current commercial vegetation management contract offerings underway in the project area, there are no funds generated from the sale of timber available to fund other restoration activities in the project area. Funding for restoration activities may be available through appropriated funding, grants, agreements with other agencies or partners, or retained receipts generated from other IRTC

stewardship contracts on the Okanogan - Wenatchee National Forest."

With respect to Alt 2, the analyst reports that if enough large diameter trees are included in the timber sales they may produce revenue above cost but this requires industrial scale logging of the high canopy older trees that restoration is supposed to promote. NCCC argues that this defeats the purpose of the commercial thin as restoration. The analyst reports other forest thinning options are not likely to approach break-even from a silviculture perspective.

In terms of the overall economics of the Twisp Restoration Project, the analyst reports, "The proposed action would require a level of investment that may not be possible with the current or expected levels of appropriations. Funding for the non-timber restoration projects can come from a variety of sources other than the value of the timber from commercial treatments such as retained receipts from other stewardship contracts on the Okanogan - Wenatchee National Forest or through partnerships with Tribes, collaborative groups, grants, and agreements with other agencies and other interested parties." ...

The Economic Specialist provides a very valuable recommendation for how the Twisp Restoration Project might be developed in light of the severe fiscal constraints, i.e.,

"Because funding from all of these sources is uncertain, the IDT would prioritize non-timber projects for implementation using the general guidelines below:

? Thinning and prescribed fire treatments in areas closest to the wildland-urban interface (WUI) and main access routes.

? Treatments that could be implemented with little or no cost, or which generate funds which can be used to pay for other treatments.

? Strategically located treatment units, which because of their location would have a relatively greater effect on modifying fire behavior at the landscape scale. Implementing treatments on strategically placed treatment units to affect fire behavior at the landscape scale is the most critical of these treatment types. As part of the implementation process, further analysis would be performed to identify the most effective sequence of implementation given budget expectations."

Conclusion:

A limited, targeted and prioritized approach for fire management and thinning is precisely the kind of plan approach that NCCC is recommending be applied to all elements of the Twisp Restoration in the design of Alt 3, e.g., riparian reserve management, lowland wildlife habitat, etc. While NCCC would normally be calling for integrated, landscape level planning for the Twisp River Watershed and environs, the magnitude in both time and space laid out in Alt. 2 defies the ability of the public and the USFS to forecast and plan. NCCC's fallback position is to call for developing an Alt 3 that can reliably be implemented within fiscal and other constraints, over a 3-5 year time period, within an adaptive planning framework that re-initiates a second, third and fourth planning process based on monitoring and science. Even this approach is ambitious over a projected 30-year time period. It is important to note that NCCC is proposing separate but sequential restoration planning processes and not a segmented decision process.

Sincerely,

David Fluharty, Board Member on behalf of
NCCC

Addendum:

NCCC requests that the MVRD seriously consider if the parts of the plan relating to opening 22.5 miles of USFS road to ATVs contributes to Twisp Restoration. It seems this is a separate action that should be addressed in another forum. The Draft EA explicitly states that no analysis of the safety or other requirements for opening the roadways to ATVs has been performed and that a separate process by a transportation engineer would have to take place before authorizing this recreational activity which is currently not permitted.