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Title:

Comments: I have lived in the Methow Valley for the past 26 years, and I have a Masters in Forestry from the Yale School of Forestry and Environmental Studies. I worked for several local non-profits doing conservation work between 1998-2013, and I have great respect for much of the forest and riparian restoration work that the Forest Service has completed in the Methow Valley.

I am concerned about the large scale and mixed objectives of the proposed Twisp River Restoration Project.

I believe this project would benefit from a phased approach, with specific restoration objectives defined for each phase. In addition, I would like the monitoring and evaluation guidelines for each of these restoration objectives to be more transparent for our local community.

I am strongly in favor of the riparian restoration aspects of this project, including culvert replacement, LWD additions and beaver pond enhancements/analogs.

I am concerned that the overall forest restoration impacts and benefits are lumped together in this project, along with other recreational and commercial goals. This makes the project almost impossible to evaluate and also makes it challenging for the public to understand and trust that the Forest Service will meet its stated (sometimes conflicting) objectives.

This project includes significant amendments to the 2012 Planning Rule (Forest Plan) and NWFP standards and guidelines (S&Gs) would allow for commercial thinning in IRA, LSR and Riparian stands. This is a significant deviation from past, publicly ratified forest management practices, and I believe this action needs more time for specific review of overall forest health costs vs. benefits.

Past fires within the Twisp Restoration Area have left a current patchwork of multi-aged stands, with some areas of densely stalked small diameter trees, and other areas of old growth timber. Some of the best examples of healthy, multi-aged riparian forests lie along the upper Twisp River valley floor, and I am concerned to see plans for commercial thinning in this area. The resilience of the entire Twisp Restoration Area depends on stand diversity across the landscape, and I am concerned that this project is taking on a one-size-fits all approach to forest management. A phased approach would allow for more specific description of forest thinning goals, strategies and monitoring guidelines, and also allow for adaptive management over time.

While the riparian benefits of parts of this Project are clear for beaver and salmonid fish, the overall forest restoration benefits for other listed species remain less clear. I believe that the impacts of this proposed forest restoration have not been adequately reviewed, including erosion and sedimentation from new roads and firelines, invasive species from increased traffic in remote areas and increased recreational access.

This proposed project would allow for over 100 miles of handline within LSR, IRA and Riparian Reserves, all of which could invite further un-managed recreational use. The continued growth of mountain biking, dispersed camping, hiking, ATV and horse use threatens to expand the impacts of this project beyond what has been predicted.

I urge the Forest Service to consider a third alternative, which would allow for a phased approach, and clearly state the goals for each phase. By mixing goals of restoration, fuel reduction and recreation, the Forest Service has opened up a pandora's box, where the public will always be confused about what the real objectives might be. Public confusion may lead to distrust and possibly legal action because there are so many conflicting goals and objectives, and because this project attempts to overturn or amend existing forest rules.

While I realize that a watershed-level management vision is important, I hope the Methow Ranger District can find a way to slow this process down and continue to build on its track record of successful, site-specific, forest and riparian restoration projects. Part of the success of past projects in the Methow watershed has been the engagement of partners, including numerous local conservation and recreation groups, WDFW, local schools, universities, and national foundations such as the National Forest Foundation. While the Twisp Restoration Project has consulted numerous partners, I believe there is still room for the Twisp Restoration Project to expand its constituency, and for this project to be a model for responsive ecosystem management, within a rapidly changing cultural and physical environment.

Thank you for your time in reading this letter and for the vast amount of work the Forest Service has done to move forward with the restoration objectives of this project.

Katharine Bill