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Comments: Thank you for the opportunity to comment on the proposed Twisp Restoration Project. I have read as much of the EA as I have been able to make time for. I am particularly concerned with the following issues:

(1) This is billed as a "restoration" project, and yet it proposes 21,984 acres of commercial logging. Not only that; it proposes logging on slopes as steep as 80 percent through use of helicopters, commercial thinning of 57% of the Forest Plan Old Growth forest within the project area, and commercial thinning of 21% of the project area's Late Successional Reserve acreage. I agree with the USFS that the forests of the project area have departed from historic conditions after decades of fire suppression, but I don't agree on the methods to rectify that situation. Understory treatments, or non-commercial thinning, should be emphasized. Where overstory thinning is warranted due to extreme overstocking, diameter caps should be imposed. When I was initially inquiring about the project, as a Newby Creek resident with property adjoining USFS land, I was told that no trees larger than 24" DBH would be removed - and yet I don't see in the EA where this diameter cap (or any other) is imposed for matrix thinning. Without limits in place, it's hard to imagine the treatments won't lean toward taking the bigger and more marketable trees, rather than those that crowd the understory and pose the bulk of the fire risk.

(2) The proposed project would reduce by 57% the northern spotted owl nesting/roosting/foraging habitat that is currently available in the project area, much (or all?) of which is designated critical habitat. I understand that no spotted owls are currently known to nest in the project area, but the fact remains that this is a federally listed species, the project area is within spotted owl range, and we should be working to make the Twisp River watershed more hospitable for this threatened bird, not less. Balancing the need to also increase fire resilience, understory treatments could be undertaken in nesting/roosting/foraging habitat, but canopy cover reduction to 40% is unacceptable.

Moreover, it is not clear to me how removal of more than half of the nesting/roosting/foraging habitat currently available to this species supports a "not likely to adversely affect" determination. Per the USFWS ESA Section 7 Handbook, "not likely to adversely affect" is the appropriate conclusion "when effects on listed species are expected to be discountable, insignificant, or completely beneficial." You have not made this case.

(3) Generally speaking, impacts on the environment are downplayed. I get how this works; I am a biological consultant. An example I'm thinking of is the northern goshawk. You say, on page 74, "There is one known northern goshawk nest site within the project area," and go on to provide your methods for identifying suitable goshawk habitat and surveying it for active nests. Your methods look reasonable on paper, but wildlife don't always stay within their appointed shapefile boundaries. There are at least two northern goshawk nests in the Newby Creek drainage; one on the Bown/Portmann property, and the other on USFS land to the southeast of the Bown/Portmann property. This past summer, I saw goshawks on at least 3 different occasions, both on the Bown/Portmann property.

Emphasizing the results of your snapshot surveys (one goshawk nest, 0 or 1 marten tracks, no spotted owls) in such a vast project area feels disingenuous to me. I don't doubt those were your survey results, but placing them front and center predisposes your reader to believe these species aren't a real concern in the project area. It's a handy trick and, for the goshawk, one you made sure to employ before revealing that the proposed action will eliminate 61% of the project area's potential nesting habitat for this species. Rather than telling us about the zero or one individuals of a given species you detected during your surveys, you should emphasize the project area's potential to support the various wildlife species, and, for occurrence records, consult as many sources as possible - eBird, local experts, etc. - to paint a full picture, instead of a picture skewed toward a FONSI.

On a tangentially related note, and FYI, I frequently see mustelid tracks in the Newby Creek drainage that are consistent with marten; I corresponded with Scott Fitkin about some tracks I saw last winter and he said I could assume they were either marten or fisher(!).

(4) The premise of an EA is that there will be no significant impact on the environment, and that case has not been adequately made here. No significant impact on the environment from 21,984 acres of commercial logging, including helicopter logging and logging of old growth? No significant impact on the environment from the loss of more than half of the project area's spotted owl nesting/roosting/foraging habitat and goshawk nesting habitat? No significant impact on the environment from opening up Late Successional Reserves to fuelwood gathering and 22 miles of road to ATV use? The list goes on and on. An EIS is warranted, along with all the opportunities for public participation that are built into the EIS process.

(5) I object to my property being included in the area proposed for stand improvement thinning, per Figure 16 of the EA. For one thing, the portion of my property that you have included in the proposed treatment boundary doesn't need thinning, as it was heavily logged in the 1990s, and just last year was treated again as part of a DNR cost share program. For another thing, I wasn't consulted about this. When I spoke with the district forester about the project this past summer, I indicated I would potentially consider allowing the USFS to burn onto the perimeter of my property during the prescribed fire treatments. But I was clear that I did not want thinning to occur on my property. I have spoken with two of my neighbors whose properties were also included in the stand improvement thinning boundary on Figure 16, and they also did not approve this.

There are some aspects of the Twisp Restoration Project that I approve of. For example, I like the proposal to install Beaver Dam Analogues, decommission roads and decrease overall road densities, and perform stand improvement thinning in the understory (other than on my property). I am also generally okay with prescribed fire, though I am concerned with the massive amount of smoke and carbon emissions likely to be associated with what you are proposing.

For this commenter, the bottom line is that this is a massive project that needs to undergo full EIS-level environmental review, with many more opportunities for the public to become informed, provide feedback, and see that feedback meaningfully considered. These lands belong to all of us, after all.