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Title:

Comments: Note: text in italics entered by USFS staff. This letter was hand delivered to Methow Valley Ranger District office by Heather Dean to the Winthrop Ranger Station Office on 12/4/2019. See attachment for Figures referenced in the text.

Mr. Chris W. Furr, Methow Valley District Ranger
Ms. Eireann Pederson, Project Team Leader
Okanogan-Wenatchee National Forest
24 West Chewuch Road
Winthrop, WA 98862
Dear Mr. Furr and Ms. Pederson, This letter responds to your 12 November 2019 solicitation of comments on the proposed Twisp Restoration Project. As the President of its Board of Directors, I submit the following comments on behalf of the Pine Forest Owners Association (PFOA). Pine Forest is a 500-acre residential community of 134 lots and nearly 250 residents, with a combined assessed property value of nearly \$30 million.¹ Our designated Firewise community shares a 1.5-mile long boundary with the proposed project area (see Figures 1 and 2). PFOA very much appreciates this opportunity to provide input on the proposed project. Our comments share specific details as to why PFOA emphatically supports the actions described in the Twisp Restoration Project proposal.

After paying precious little attention to our forest for the first 20 years of our existence, Pine Forest began to appreciate our responsibility to manage that resource for both forest health and fire risk reduction approximately 25 years ago. The first 15 years of our endeavors included assessment and planning led by professional foresters and fire experts, undertaken in cooperation with and/or at the urging of the USFS and other agencies, and culminating in our 1998 Forest Stewardship Plan and 2006 Community Wildfire Protection Plan.² The observations described under Need #2 (Vegetation Composition and Structure) of the Twisp Restoration Project Needs, Proposed Actions, and Forest Plan Amendments very closely echo those of the plans prepared for Pine Forest, namely that the forest had: [bull] densely stocked stands with dense canopies and reduced resilience due to diminished understory species diversity; [bull] conifer encroachment into aspen stands; [bull] increased occurrence of disease and insect outbreaks;³ and [bull] increased likelihood of severe fire behavior and increased risk of crown fire. Heeding the urgent advice of our plans, Pine Forest began conducting commercial and noncommercial thinning approximately 20 years ago. The USFS complemented our early efforts with thinning and prescribed burning along a portion of our shared boundary (see Figure 3). Progress for both parties ground to a halt after about ten years, in Pine Forest's case due to State and Federal grant monies that had funded the majority of the work no longer being available.

Footnotes
Page 1: 1. Value derived from Okanogan County Taxfinder website (<http://okanoganwa.taxfinder.com/Search/Results.aspx>). 2. Copies available upon request. 3. In fact, Pine Forest has consulted with both the USFS and the WDNR about an apparently fatal affliction of Douglas-fir that we are currently experiencing. The affliction, which we refer to as "needle fusing syndrome," was unknown to both agencies, and its cause remains a mystery.

Page 2: With the reminders provided by the Little Bridge and Twisp River fires in 2014 and 2015, the latter of which came within one quarter mile of us and likely stopped short only as a result of extensive (and expensive) aerial assault, Pine Forest's awareness reawakened, and we redoubled our efforts to reduce fuels to improve our forest health and fire risk. We recently completed our fourth consecutive year of commercial thinning and are currently engaged in a third year of ladder fuel reduction, with plans to continue fuel reduction over the next four years. While we have received a modest amount of financial assistance for recent noncommercial thinning through WDNR's cost share program and a small Okanogan Conservation District grant-Pine Forest owners have spent nearly \$350,000 of our own funds for commercial and noncommercial thinning over the last five years. 4 We are proud to say that in the last five years we have reduced timber fuels on more than 100 acres and ladder fuels on over 160 acres of our neighborhood, with 70% of our owners participating in one or both activities. In that time, we have removed nearly 400,000-130,000 board feet of merchantable timber from Pine Forest, burned nearly 2,000 slash piles, and broadcast the results of 1,000 hours of slash chipping. Figure 4 shows the areas of fuel reduction over the last five years, while Figures 5 and 6 provide some before and after photos of treated areas. We have more work to do! As noted, PFOA intends to continue ladder fuel reduction for another four years. We also plan to thin larger trees in additional areas in 2020. Our work to educate owners and encourage previously non-participating owners to join

in would both benefit greatly from USFS-led fuel reduction work next door. Unfortunately, some Pine Forest owners have resisted undertaking such efforts on their properties because they believe that the overstocked condition of the adjacent USFS lands renders our efforts futile. We recognize that the risks of severe fire behavior and invasion of disease and insect infestations remain high around our borders despite the work we've already done and plan to do.⁶ Figure 7 documents the starkly differing conditions between recently treated areas of Pine Forest and neighboring untreated properties, most of which are USFS lands. For these reasons and in recognition of our past partnerships in this important work, PFOA strongly encourages the USFS to complement our efforts once again by including fuel reduction around Pine Forest as part of the Twisp Restoration Project. (The neighboring private property in Figure 7e lies between USFS land and Patterson Lake; we assume that natural control point makes the private land eligible for inclusion in the project under the Wyden amendment. In conclusion, Pine Forest greatly appreciates the project area including lands adjacent to us and heartily supports both the conclusions and the proposals of the Twisp Restoration Project.

Footnotes Page 2:4 Net costs may ultimately prove higher, as it is still unclear how much, if any, we will receive from the additional \$30,000 in timber income that the Zosel mill in Oroville owed us at the time of their fire.⁵ There is some overlap in acreage of commercial and noncommercial thinning (see Figure 4).⁶ A spring 2019 pine bark beetle infestation in Pine Forest originated on USFS land immediately to our west.

Page 3 We believe the proposal accurately identifies critically needed actions that will both improve forest health area and reduce the chance of catastrophic destruction from fires in the proposed project area and on adjoining properties. We also implore the USFS specifically to conduct fuel reduction efforts along our boundaries to complement the extensive investment we have made and will continue to make in the years ahead. Again, thank you for this opportunity to submit comments.

Signed by Heather Dean (PFHA treasurer and Firewise Coordinator) for Ann Fox on behalf of PFHA Board President

NOTE: See attachment for photos showing treatments within PFHA and conditions on USFS lands adjacent to PFHA.