



VIA Email: objections-pnw-regional-office@usda.gov

June 14, 2022

Regional Forester
ATTN: 1570 Objections
PO Box 3623
Portland, OR 97208

Dear Objection Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide a letter of support for the Twisp Project which is currently in the Objection period.

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Okanogan-Wenatchee National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

Background Information

On April 29th, 2022, the Okanogan-Wenatchee National Forest announced that it prepared an environmental assessment (EA), draft decision notice (DN) and finding of no significant impact (FONSI) for the Twisp Restoration Project which opened the 45-day objection period. We are not writing to object to the Project, rather this letter is in support of the Project and Alternative 2 along with our desire to see treatments implemented in a timely manner as the project's primary objective is to improve resiliency to wildfire.

The 24,140-acre Twisp Project area is located on the Methow Valley Ranger District South and west of the community of Twisp, Washington. AFRC submitted scoping comments on December 10, 2019, and Draft EA Comments on December 14, 2020, as well as staff of AFRC participating in the North Central Washington Forest Health Collaborative (NCWFHC), and the

Projects and Economics subcommittees of that Collaborative that has been very closely involved with the Project.

The size of the Twisp Project has been reduced in size by over two-thirds due the Cedar Creek fire burning part of the Project in 2021 and the decision by the District to only treat the lands in the matrix section of the Project area. The Project area has been reduced from 77,083 acres down to 24,140 acres.

Compelling Reason for Project Implementation

First, we would like to provide a segment from our Draft EA comments that is still pertinent and highlights why the area needs to be treated as soon as possible. *“The analysis area covers 77,083 acres. The primary focus of the project is to restore watershed health and resiliency by returning fire to the landscape, improving wildlife habitat, and improving watershed function. This landscape needs a more proactive approach to forest management because a century of fire suppression has dramatically altered the health and natural balance of the forest. The 2018 Crescent Fire, 2015 Twisp River Fire and 2014 Little Bridge Creek Fire are the most recent reminders that now is the time to restore a forest that meets the needs of present and future generations. Forest conditions in the Twisp Project area need proactive management to restore the landscape to a healthy and well-functioning condition that is resilient to wildfire”.*

Since submitting these comments, the Methow Valley District has experienced two large wildfires in 2021, the Cedar Creek Fire and the Cub Creek 2 Fire, which in combination burned tens of thousands of acres (part of which was in the Twisp Project). These events emphasize the need to quickly implement the remaining treatments of the Project and complete the fuels reduction and forest health work necessary to prepare these forests for the next fire event.

Unique Implementation Features of the Project AFRC Supports

We remain supportive of the use of “Condition Based NEPA” when analyzing the environmental impacts from the proposed treatments. During scoping, the District first analyzed all of the potential needs within the project area. Not all of these acres will ultimately get treated, but this approach will allow a closer examination of stand conditions and needs by District staff at the time of implementation to decide on a proposed strategy. This flexibility gives the District time to assess actual ground conditions at the time of implementation rather than several years prior during the initial development and scoping process. Much can change during a three-four-year timeframe, and this will allow District staff to better align treatments with needs.

AFRC is pleased that the District is moving away from the earlier adopted “Wenatchee Restoration Strategy.” This Restoration Strategy applies outdated, unrealistic, and arbitrary parameters on project design features and retards effective project implementation and results. Arbitrary guidelines such as not harvesting trees over 20 inches in diameter and limiting the scope and size of projects have prevented the Okanogan-Wenatchee National Forest from taking needed management steps to reduce wildfire threats and make other necessary resource improvements. Forests are dynamic and changing, and management tools should be adaptive to

those changes rather than rigid. We support harvesting trees of any size in the Matrix and LSR if doing so meets objectives and attains desired end results.

Economic Importance of Timber Harvest

In addition to implementing this Project to reduce the risk of fire and improve forest health, our members depend on a predictable and economical supply of timber products from Forest Service lands to run their businesses and to provide useful wood products to the American public. This supply is important for present day needs but also important for future needs. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of particular importance is how those treatments effect the long-term sustainability of the timber resources on Forest Service managed land. AFRC has voiced our concerns many times regarding the long-term sustainability of the timber supply on Forest Service land and how the current management paradigm is affecting this supply. Lands designated as Matrix are the only lands where our members can depend on a sustainable supply of timber products, as timber outputs on lands designated as reserves are merely a “byproduct.” Studies have shown that for each million board feet harvested in Washington State an estimated 12-15 jobs are created. On October 28th, 2021, upon our request, AFRC and our members met with staff from the Forest and toured the Cedar Creek Fire and remaining unimpacted portion of the Twisp Project. AFRC members are very interested in seeing the Project progress and utilizing the timber products that will be generated from the subsequent timber sales.

Multi-Party Analysis Supports Management

Supplementing the Forest’s analysis of the Project area and the District’s “needs analysis” (stand exams), the Washington DNR did a landscape analysis and Conservation Northwest hired Ecological Forestry to do an analysis as well. While each evaluation differed on acres treated, all three studies identified immediate needs for treatment to reduce wildfire risk and improve other resources. The DNR report mirrored much of the stand exam information collected and used by the Forest to develop their treatments. These three parallel assessments only reaffirms the need to move this Project forward.

AFRC Supports Managing in the Matrix Lands

The reduced Twisp Project is only planning to allow treatment in the Matrix portions of the landscape. AFRC supports the criteria set forth for commercial treatments in the Matrix Area.

- We also support using shaded fuel breaks in the Matrix along selected major access routes and ridges to reduce fire intensity and create anchor points for suppression actions. We feel the overstory thinning treatment to 600 feet in width is needed to provide needed defense for fire suppression. AFRC suggests that these shaded fuel breaks be incorporated in the regular harvest units when practical. We looked at these proposed areas during a field trip in the spring of 2021.
- We support regeneration harvests on Matrix land in areas where insect and disease and infestations has necessitated removal of the overstory and establishing new healthier stands. While the Draft EA does not identify request for Regional Office approval of openings larger than 40 acres, AFRC suggests including this option should the forest health issues dictate it.

Project is Important for Wildlife Habitat

AFRC supports treatments that develop, and/or enhance late and old forest stands for wildlife dependent species and treatments that reduce the risk of large-scale habitat loss to fires. AFRC believes that one component of this strategy is to enhance the early seral species needed to support big game species such as deer and elk. Studies have found that forage is more important to big game species during the winter months than cover. To accomplish this, areas of overstory removal or wide thinnings may be necessary to provide sufficient sunlight to establish certain grass and forbe species needed by these species. Overstory removal of conifers will also enhance the growth of bitterbrush which is important in the winter range areas.

AFRC also supports amending two Standard & Guidelines for the deer winter range as the table below outlines:

Deer Winter Range: Two Forest Plan S&Gs would be amended to allow treatments that would reduce deer winter range cover (including snow-intercept thermal and winter thermal) in Management Areas (MA) 14 and 26 to levels below those specified in Table 1:

S&G MA14-6A, S&G MA26-6A: Manage all identified deer winter range for the following well-distributed cover:

Table 1. Characteristics of Deer Winter Range Cover in Prescriptions 14 and 26

Winter Range Cover	Methow and Other
Snow-intercept Thermal	≥ 15%
Winter Thermal	> 25%
Hiding	≥ 0%
Total:	≥ 40%

Thinning and prescribed fire treatments would have a long-term, moderate benefit to mule deer winter habitat because proposed thinning and prescribed fire treatments would increase the quality and quantity of forage areas and the increased resilience of forested cover stands to disturbances such as wildfire.

Project Improves Riparian Areas and Reduces Roads

Aquatic Habitat Enhancement treatments are proposed in this project that include placing an estimated 6,000 pieces of large woody debris > 6-inches diameter in stream channels. AFRC recognizes that this work is critical for the aquatic resources especially the anadromous fish species found in the Methow River drainage and Twisp River. Some materials would come from felling trees directly into streams as described under the “Aquatic Restoration Thin” prescription. Other woody material would come from the “Tree Tipping” areas proposed in this project. Most of this material would be brought in from off-forest and stockpiled at specified areas, then transferred to stream reaches via helicopter to create accumulations of 2-40 logs, including engineered log jams (ELJs) that would be placed where mobile wood poses a conceivable risk to downstream values.

The project is undertaking an aggressive approach for dealing with unwanted and unneeded roads. The goal is to improve aquatics, reduce siltation and access to wildlife winter range among other resource benefits. A total 84.6 miles of roads are being proposed for

decommissioning, including approximately 41.4 miles (49%) of NFS system roads and 42.9 miles (51%) of unauthorized roads.

Project Reduces Fire Threats To Wildland Urban Interface

Another Need of the Twisp Restoration Project is *“to modify the structure, composition, and patterns of forest stands within and adjacent to the wildland/urban interface (WUI) to reduce fire intensity and the risk of crown fire initiation and enable the use of more direct firefighting strategies to protect life and personal property. Reduce fire intensity along major access routes and ridges within and outside of the WUI to minimize the hazards of ingress/egress and provide effective suppression anchor points that limit fire spread during wildfires.”* AFRC suggests thinning to wide spacings in the WUI to 40 sq. ft. of residual basal area. This will not only reduce fuels and facilitate safe and effective fire suppression, but it will help restore the vigor of the remaining trees.

AFRC is a strong advocate of shaded fuel breaks, and the work the Forest is proposing. This could be a valuable tool along roads that provide ingress and egress to the private lands and structures within the project WUI areas.

Project Feasibility

AFRC comments on each project to remind the District that the primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. This issue is often addressed in the Economic Subcommittee group as well. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EA's and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Okanogan-Wenatchee market area with a variety of skills and equipment. Developing an EA and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the EA and contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposal area is planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest. Tethered-assist equipment is also becoming a more viable, safe, and

available option for felling and yarding on steep slopes. This equipment has shown to contribute negligible additional ground disturbance when compared to traditional cable systems. Please prepare your NEPA analysis documents in a manner that will facilitate this type of equipment. AFRC is pleased to see that the District has allowed ground-based equipment on slopes up to 45%. We also appreciate the District's economic analysis regarding volumes per acre. *"Units thinned with ground-based harvest systems would generally need to provide at least four thousand board feet (MBF) per acre from trees from 7-30" dbh to be commercially viable; 6 MBF per acre for cable/tethered logging systems; and 8-10 MBF for harvest operations using helicopters."*

Implement the Twisp Project

AFRC believes the information provided above outlines the many reasons why the Twisp Project should be promptly implemented to increase the forest's resiliency to wildfire before the next wildfire affects the project area. While this is a support letter for Twisp, should other objections be filed, AFRC would like to be a part of any resolution meeting that might be set up. Should a resolution meeting be held, we strongly recommend that all parties objecting participate in one Resolution meeting.

Thank you very much for taking our comments and I look forward to working with the Forest to get the Twisp Project implemented.

Sincerely,



Tom Partin
AFRC Consultant

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