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December 18, 2020

Chris Furr, District Ranger  
Methow Valley Ranger District Okanogan-  
Wenatchee National Forest  
24 W. Chewuch Rd.  
Winthrop, WA 98862

Dear District Ranger Furr,

We are writing to comment on the Twisp Restoration Project Draft Environmental Assessment (EA), and to thank you for extending the public comment period for this important project. Our comments on the Twisp Restoration Project draft EA build upon NCWFHC scoping comments from December 12, 2019 as well as recent PWG meeting dialogue.

The NCWFHC acknowledges and appreciates the Methow Valley Ranger District's (MVRD's) engagement and participation in our various Projects Work Group (PWG) meetings related to the Twisp Project. It is a large complex project with a broad time horizon, phased timber harvest, and unique elements such as a condition-based approach and proposed timber cutting in Late Seral Reserves, Inventoried Roadless, Riparian Reserves, and Forest Plan Old Growth. We look forward to continuing our engagement with you and your staff through the remainder of the planning phase, as well as, the implementation and monitoring phase.

The magnitude and scale of treatments in the proposed action reflect an understanding of the needs present on the landscape and are independently supported by assessments completed by Derek Churchill (DNR) and Sean Jeronimo (Resilient Forestry). These needs when balanced with site-specific conditions and existing laws, regulations, and policy should inform the final location, prescription, and size of those treatments. The Collaborative remains strongly supportive of the Forest Restoration Strategy approach and we appreciate the MVRD's commitment to treating the whole landscape. In particular, the attention to aquatic restoration needs, returning fire to the landscape through prescribed landscape burning, and providing wood to the local infrastructure while managing for resilient forests is commendable.

Because of the complexity of the current proposal with proposed tree harvest impacts to Late Seral Reserves, Inventoried Roadless, Riparian Reserves, and Forest Plan Old Growth, the NCWFHC feels

that earlier engagement on some of the more sensitive parts of the proposal would have been helpful (such as with Mission and Mt. Hull) and now feels that a greater level of detail on how the proposed elements are consistent with the OWNF Restoration Strategy may be warranted.

Below we highlight high-level themes of shared support among NCWFHC members, and we provide comments and/or suggestions for improvement or requests for the MVRD to consider regarding the draft EA. Please note that individual members of the NCWFHC may submit more substantive comments from their unique perspective.

### **Aquatics Restoration Actions**

We applaud the strong focus and importance placed on protecting and restoring aquatic habitats, especially given the size, complexity and recent fire considerations on the Twisp Restoration Project landscape. We remain very supportive of the proposed process-based aquatic restoration components, which utilize the best available science to improve habitat conditions that have been objectively identified through robust and repeatable analyses. The NCWFHC encourages and supports the planned use of large wood material, Beaver Dam Analogs (BDAs), and other creative restoration actions to promote instream habitat complexity and to restore channel/floodplain interactions. As such, we feel the aquatics component is one of the strongest components of the draft EA.

The NCWFHC would like to offer the following specific observations and suggestions for improvement to the Twisp Restoration Project and the draft EA from an overall aquatic restoration perspective:

- The aquatic analysis could have been made more robust by more thoroughly analyzing the location of current and future roads and associated levees, determining and quantifying the impacts they have on aquatic habitats (e.g., sedimentation, geomorphology), and proposing actions to comprehensively address impacts especially where federally listed fish stocks occur.
- More detailed maps and figures would be helpful in more clearly documenting site-specific analysis results of proposed treatment areas in riparian reserves. Additional detailed maps depicting the locations of proposed valley-bottom vs. uplands treatment areas would be helpful, as well as maps detailing how treatment areas are distributed within the inner and outer portions of riparian reserves.
- A clearer depiction of where condition vs. site-specific approaches are being used to achieve aquatic restoration objectives, perhaps in map format, would be helpful.
- All proposed harvests in riparian reserves should be backed with site-specific analysis and provide a written science-based rationale for the proposed harvest.
- Locally sourced large tree harvests for use in aquatics restoration projects should be considered as a project strategy where feasible, including overall impacts, appropriate location and cost-effectiveness of removing those trees.
- Recognizing the treatment needed within some upland areas of riparian reserves, we are requesting additional clarification. We recommend elaborating on site-specific riparian reserve harvest prescriptions and management needs (i.e., harvest proposals should discuss site-specific fuel loading, anticipated fire behavior, valley-bottom topography, current floodplain vegetation,

anticipated benefits to riparian and aquatic resources, and departure from historic condition to justify harvest prescriptions).

### **Terrestrial Restoration Actions**

The NCWFHC recognizes the MVRD's commitment to a truly landscape-scale project. The associated complexity and the magnitude of restoration actions that are proposed to improve overall forest health in the project area is significant. We support utilizing commercial treatments to address as many of the forest health restoration needs in the project area as possible to achieve a blend of ecological, economic, and social goals. Commercial treatments will improve forest health, promote rural economic development, provide retained receipts that can be invested to implement crucial non-commercial treatments that are necessary to achieve restoration goals in the project area and protect the Wildland Urban Interface areas that have witnessed large fires in recent years.

Overall, the proposed action would benefit from additional information about how treatment prescriptions and locations were designed to build resiliency, forest health, and align with the restoration strategy. We believe the Twisp Restoration Project continues to provide an excellent opportunity for collaboration to encourage creative contracting and cost-sharing to be able to treat more of the landscape and match stakeholder interests.

While the NCWFHC supports many terrestrial treatment approaches in the proposed action, due to the limited time to work through areas of concern and uncertainty, the NCWFHC has not reached consensus around certain terrestrial elements of the project. We have listed those areas here in the hopes of engaging with the district in productive discussions between the draft and final EA to ensure the final decision is well supported. These elements include:

- Harvesting of large vs old trees
- Determination of diameter cut limits
- Salvage logging in Inventoried Roadless Areas and Late-Successional Reserves
- Harvest in Riparian Reserves/valley bottom
- Inclusion of proposed ATV route in this restoration project
- Shaded fuel breaks away from the WUI and within overstory thinning areas
- Stand treatments that differ from landscape analysis results
- Monitoring and adaptive management needs

To reiterate our earlier statement, the NCWFHC appreciates the MVRD's efforts to share information and engage with the PWG in recent meetings, and we hope to work with MVRD to establish a clear process and next steps for collaborating during the development of the final Environmental Assessment and beyond. We believe continued productive dialog between the NCWFHC and the MVRD will result in a stronger project overall. Moving forward, we look forward to collaborating on implementation and monitoring activities and assisting the MVRD to adapt overall implementation practices to ensure treatments are responsive to dynamic on-the-ground conditions, new scientific information, and public input over the long life of this project.

Lastly, we look forward to re-assessing the productivity of our pre-proposal engagement strategies and continued collaboration on large-scale restoration projects with the MVRD. The NCWFHC remains committed to finding efficient and productive ways to collaborate with the goal of increasing the pace and scale of restoration on the Okanogan-Wenatchee National Forest, a goal that we all share.

Please contact Pete Teigen or Sarah Walker, NCWFHC facilitators with Upper Columbia Salmon Recovery Board, at [pete.teigen@ucsr.org](mailto:pete.teigen@ucsr.org) or [sarah.walker@ucsr.org](mailto:sarah.walker@ucsr.org), with any questions.

Sincerely,



Chris Branch/Okanogan County  
NCWFHC Co-Chair



Mike Anderson/The Wilderness Society  
NCWFHC Co-Chair

cc: Kristin Bail/OWNF  
Meg Trebon/MVRD  
Eireann Peterson/MVRD  
Crystal Elliot/TU, Projects Workgroup Co-Chair  
Mike Liu/CNW, Projects Workgroup Co-Chair