Protecting the forests and wildlife of the Columbia Highlands since 1976

**Kettle Range**

CONSERVATION GROUP

January 28, 2020

 *VIA ELECTRONIC MAIL*

Okanogan-Wenatchee National Forest

Methow Valley Ranger District

 c/o Meg Trebon

24 West Chewuch Road

Winthrop, WA 98862.

Comments to: [comments-https://cara.fs2c.usda.gov/Public/CommentInput?project=63933](https://cara.fs2c.usda.gov/Public/CommentInput?project=63933)

Re: Midnight Restoration Project Scoping

Dear Ms Trebon,

Please accept these comments on behalf of the Board of Directors and 500 members of the Kettle Range Conservation Group (KRCG). Formed in 1976, Kettle Rangers have been a voice for fish, wildlife and wilderness. We invested 20 years in forest collaboration with the Colville and Okanogan-Wenatchee National Forest. We trust this has demonstrated our commitment to problem solving. We are, however, committed to a robust defense of forest ecosystems and urge the Forest Service to value equally wildlands & wildlife, dead trees and wildfire as much as it does timber harvests.

**Forest Restoration vs. Production Forestry**

Please demonstrate an intention to restore ecological diversity and the habitat needs of seclusion dependent wildlife species.

A true forest restoration approach mimic natural processes rather than restoration of a mythological structure metric that is a mere snapshot of ecological processes and absent accurate historic records -- a few historic photo points in no way capture actual historic activities. Actions which focus on restoring stand structure at the expense of forest ecological processes and function are not true restoration projects.

Regarding the project in total, we ask that you do not mark leave trees with orange paint. Orange paint is an ugly distraction that lasts for decades after its application. Please, a more forest friendly color choice or no color at all would be a better choice. Please also we urge you to embrace a restoration strategy that attempts to repair ecosystem damage created by management decisions over the last 90 years, recognizing that forest management is multi-generational and is so very dependent on plethora of factors, known and unknown – such as climate related droughts / floods / storms and associated ecosystem responses (bugs, disease, wildfire). We reject the notion that current science knows all and how the fix past mistakes without respect to emerging new science.

**Just say NO to Shaded Fuel Breaks**

Shaded fuel breaks don’t work in most severe fire weather conditions which are always driven by wind. Recent research found a 1% chance of any forest acre burning per year. Shaded fuel breaks at best have temporary ladder fuel and surface fuel impacts and must be maintained on a regular <20 year basis. What are your estimates for the efficacy of fuel breaks? How frequently will prescribed fire and other fuels treatments be applied in the project area over the next 20 years? What is the likelihood of necessary/adequate funding to maintain fuel treatments and how will those benefit historic range of variability (HRV)?

Why won’t the simple use of prescribed fire achieve fuel reduction objectives? Why won’t prescribed fire alone achieve the Purpose & Need?

Will fire-prevention efforts be focused on the WUI? What width specification will be used in designating the WUI? Many of the proposed treatment units are well away from WUI’s. In the EA/EIS, please provide information distinguishing WUI prescribed burns from burns with other objectives.

# Ecological Forest Restoration

A focus on forest resiliency is applying best available science. Please apply these criteria to this project.

* Use a spatially explicit landscape Evaluation as a diagnostic tool to assess how the current pattern compares to the historical pattern
* Conduct planning and management at appropriate scales to effectively restore multi-level landscape patterns, processes, and dynamics.
* Retain all large, mature and old trees. When large and old trees aren’t present, retain the second and largest cohort that will become large and old trees.
* What are snag and large woody debris objectives (standards/guidelines) and how will these be met?
* Move toward restoring natural fire regimes.
* Apply plant association group (PAG) typing to identify forest vegetation classification.
* Mixed conifer (mesic and northern Rocky mixed conifer NRMC) should not be typed as Douglas fir-dry.
* Retain and create snags and down logs, especially large ones
* Treat activity fuels
* Move toward restoring size distributions of historical successional patch size.
* Use topography to guide restoration of successional and habitat patchworks
	+ Create natural edges and borders where no longer present
	+ Maintain scenic integrity.
* Reduce ladder fuels where appropriate while maintaining adequate snow intercept and thermal cover for winter wildlife needs.
* Maintain horizontal cover and denning habitat needs for Canada lynx.
* Manage for complexity ad heterogeneous landscapes
* Promote pyrodiversity in the appropriate areas (i.e. mixed-severity forests).
* Consider the future range of variability, especially considering climate change, increasing human disturbances and future water deficit scenarios when planning project actions.
* Maintain adequate snags and coarse woody debris for wildlife, soils, amphibians and bugs.

**Roadless Areas**

Please provide analysis of Inventoried Roadless Areas (IRAs) and associated unroaded areas.

Do roadless areas begin at the road edge and if not, why not?

**Wildlife**

* What are the cumulative environmental impacts to wildlife of wildfire, recent, current and future tree management projects in associated Twisp and Methow River watersheds?
* What are the cumulative impacts of this project combined with adjacent forestry projects on seclusion-dependent species including TES species?
* In total, how are you determining your linked actions across this broad landscape are not going to jeopardize TES species?
* What if any monitoring data supports significantly changing wildlife habitat suitability for seclusion dependent and migrating sensitive species moving between lowland and highland habitat?
* How will logging treatments along Twisp River impact aquatic ecosystem function and suitability?

**Recreation / Watershed**

* How are these actions going to impact wilderness quality experiences? How will action influence views scenic integrity of the Twisp River region?
* What are potential impacts of increased use of ATVs, notably with the potential for illegal cross-country use within the project area? What are your mitigation plans for preventing long term damage to the forest ecosystems and the watershed of the Midnight Restoration project area fisheries?
* What do your landscape architects recommend to mitigate for visual changes to the landscape?
* What are the cumulative environmental impacts of existing authorized off-highway motorized vehicle use – including over-snow machines, firewood cutting, road construction, dispersed camping, livestock grazing and other foreseeable effects in the Midnight Restoration project area?
* Forest Service manages fish & wildlife habitat – so how does this project’s estimated logging removals and adjacent projects comport with protection of habitat for lynx, grizzly bear, wolverine, goshawk, great grey owls and other wildlife – wild fish & plants?

**Prescriptions**

* What are anticipated impacts of silviculture prescriptions on forest soils? What are additional factors associated with increased use of areas opened up by logging and road construction by cattle and other livestock?
* We request site-specific forestry prescriptions and road location data be provided together with release of the draft environmental assessment for this project. This information is essential for the public to understand what the Service is proposing to do and in turn may help the Service craft a project design that both acceptable to the public and scientifically justified.
* We oppose shelterwood, removing natural clumping of trees, even spacing of leave trees and regeneration cuts.
* We ask that treatment areas with known root rot be treated only during snow covered or frozen ground periods to avoid spreading this fungus.

**Forest Restoration**

Below are some principles KRCG urges and which we believe are truly restoration:

* Removal of large, pre-settlement trees will undermine credibility of restoration efforts while degrading wildlife habitat and exacerbating fire risk
* Thinning of the overstory canopy is generally at odds with the goals of restoration
* Thinning is very unlikely to meet restoration objectives unless it is combined with prescribed fire. Restoration thinning standards should set an upper limit of 14” dbh regarding tree cutting
* Thinning does not appear to be useful at all to the goals of restoration in higher elevation, north-facing aspects and cold, moist forests
* "salvage" logging, is a purely commercial concept and will not facilitate restoration
* Road construction and other soil disturbances related to ecosystem restoration efforts are likely to be at odd with the goals of restoration, particularly with regards to water quality, off-road vehicle (ORV) use and control of noxious weeds
* In roadless or unroaded areas, where understory thinning is deemed necessary, fire with minimal thinning and no road construction must be used in order to maintain these important areas as reservoirs of biological diversity and ecological baselines; construction of new roads in these areas will be counterproductive
* In general, in light of their current state of depletion and their importance not only as habitat but also as genetic and scientific resources, protection of remnant old growth pine is of prime importance
* Top priority should be given to preservation of late-structure stands that, while they may be out of line with HRV in a number of areas, may be serving as *substitute old growth* for old-growth dependent species
* Impacts of grazing must be analyzed and addressed in valid restoration projects, as grazing has substantially degraded water quality, soils, recreation and wildlife habitat wherever it has occurred
* Acting in haste to solve the problems related to 150 years of intense human activity will fail produce the desired restoration effect
* HRV determinations must be based on local assessment of pre-settlement conditions
* Fire exclusion impacts to forest ecosystems must be scientifically credible – what would a natural forest look like in the absence of fire and why wouldn’t prescribed fire if used instead of logging achieve similar ecosystem restoration objectives?
* Attempts to strictly replicate conditions of the past are often both undesirable and unfeasible
* Restoration of wildlife habitat is a critical component of any true restoration project. In a restoration project, merely mitigating impacts of activities on wildlife is insufficient—there must be a net gain in the availability of suitable habitat for resident species, particularly threatened or endangered species.
* Whenever possible, existing roads should be not only be closed, but effectively decommissioned, since high road density is one of the primary causal agents in ecosystem degradation

**Roads**

We encourage road decommissioning, blocking / repairing illegal ATV cross-country routes and culvert replacement in the project area. We oppose new road construction and stream crossings to accomplish silvicultural prescriptions. Old road prisms that have revegetated and recovered hydrologically are not roads and as such constructing road prisms in such locations are in fact NEW construction. Please provide supporting evidence including scientific research that supports a conclusion that such construction – or what you might call reconstruction -- does not have similar environmental impacts as what the Forest Service terms “new road construction.”

**Other Issues of Concern:**

* Please include in the analysis the baseline of insect and pathogen activity to which the current levels are compared in order to determine whether current levels are “healthy” or “unhealthy” when viewed from the perspective of natural forest functions and processes. Has the Forest accounted for HRV’s for insect and pathogen activities?

**Comprehensive Analysis**

KRCG requests that a comprehensive analysis of the project planning area will be conducted in all areas, including but not limited to soils analysis, sediment analysis, and cumulative effects analysis. Additionally, we will be looking for analysis of impacts on MIS, TES species and other wildlife; recreation; fisheries; roadless/unroaded areas; weeds; grazing; air quality; etc.

Thank you for the opportunity to comment on this project. We look forward to following this project as it proceeds through NEPA process. Please keep us on the mailing list and keep us advised of future projects.

Sincerely,

Timothy Coleman

Executive Director