

June 9, 2023

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

Dear Meg Trebon and the Methow Valley Ranger District,

Thank you for the opportunity to comment on the Midnight Restoration Project. As a small homeowners association immediately downstream and adjacent to the Midnight Restoration Project along Wolf Creek, we support the need of this project to protect and maintain wildlife habitat and forest structure while also reducing fire risk to nearby communities. As an HOA, we are already engaging in our own understory thinning to reduce fire risk and improve the rich wildlife habitat surrounding us. Our comments are mostly focused on the areas of this project that we have on-the-ground knowledge of in the Wolf Creek drainage. The majority of treatments planned for the Wolf Creek drainage are stand improvement understory thins. We support these prescriptions as there is a high density of young trees in most of the area. We would like to see that any thinning is accompanied by prescribed burns. There are many dead and downed trees in this drainage and we know that thinning and burning together can improve the resilience of the forest to future wildfires. Thinning alone without burning leaves a substantial fuel source on the forest floor.

Our main concerns surround a planned matrix thin unit that abuts the Forest Service's eastern boundary to the south of Wolf Creek and below the ridgeline that extends from Sun Mountain Lodge. On the ground and on the provided road map, there are no nearby roads to access logging on this steep slope. The nearest road is 4410522 which ends well over a half mile from the start of the matrix prescription. Without any roads nearby, our question is: how would this be logged and what impact would it have on the landscape if it were logged?

We also have concerns about the difference between this matrix thin block and the surrounding stand improvement thins. As the most aggressive overstory thinning prescription, this matrix logging will stand out considerably on the landscape next to forest that has had understory thinning (to the west) or no thinning at all (on Sun Mountain Lodge land to the east). Without road access we would prefer to see this matrix unit instead treated with the same stand improvement thin. There is already a considerable fire break on this north slope above Wolf Creek, a meadow running most of the way from the creek to the ridge that was used as an effective fire break in the Cedar Creek fire. With the majority of the area upstream of this fire break already burned at high severities and understory thins planned throughout this zone, the forest here will be well prepared to withstand a future wildfire approaching from the north or west.

Areas on both sides of Wolf Creek upstream of Little Wolf Creek burned at high severities during the Cedar Creek fire. While the forest is recovering remarkably well, the soils remain

quite fragile. Understory thinning and prescribed burning in these areas shouldn't need to be carried out with any mechanical equipment which would damage the soils. We'd also prefer to see overstory treatments in burned areas carried out by hand such as around the Wolf Creek Trailhead.

We are also wondering if there is any planned outreach to abutting large landowners to the Midnight Project such as Sun Mountain Lodge to encourage understory treatment that would create more fire resiliency over this connected landscape.

Across the entire project, we're supportive of understory thinning if followed by prescribed burning. We'd like to see large and old trees over 20" left standing as they are deficient across the forest, provide critical structure and habitat, and are resilient to wildfire. Our hope is that the Draft Environmental Assessment provides several varied action alternatives and that the Methow Valley Ranger District engages the public about these alternatives.

Sincerely,

Wolf Creek BC Owners Association

Members:

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