



June 9, 2023

Christopher Furr, District Ranger  
Methow Valley Ranger District  
Okanogan-Wenatchee National Forest  
via email to: [chris.furr@usda.gov](mailto:chris.furr@usda.gov)

Dear District Ranger Furr:

Thank you for requesting input on the Methow Valley Ranger District's (MVRD) Midnight Restoration Project Area scoping notice. The North Central Washington Forest Health Collaborative (NCWFHC) appreciates the MVRD's continued engagement on this project and participation in our various meetings and field trips. Our comments attempt to answer the questions posed in the Scoping Letter. In addition, we have focused our questions and concerns to get us closer to a shared understanding of how this project will look once implemented. Developing this shared understanding helps us have a no-surprises approach to this work, reducing conflict and resulting in faster and better on-the-ground work.

We look forward to continuing our engagement with you and your staff through the remainder of the planning, implementation, and monitoring phases of the Midnight Restoration Project.

### **Project History**

In November 2021, due to the Cedar Creek Fire and other considerations, the MVRD reduced the size of the Twisp Restoration Project area, cutting out the Middle and Upper Twisp portions. The MVRD lacked the capacity to reevaluate Middle and Upper Twisp areas after the fire. As a result, select members of NCWFHC initiated discussions to expedite the restoration of the dropped portions, later named the Midnight Restoration Project. As a result, Resilient Forestry, a consulting firm working under contract with The Wilderness Society, drafted a landscape prescription followed by a preliminary proposed action (PPA) and purpose and need for the Midnight Restoration Project, which was delivered to the MVRD in December 2022. The NCWFHC Projects Work Group and Steering Committee recommended the PPA and purpose and need "for consideration and use in the development of the agency's Proposed Action for the Midnight Restoration Project, recognizing that the PPA may be modified and improved during the NEPA process by Forest Service staff or in response to public input from NCWFHC members and others."

### **Need for Action**

The NCWFHC is interested in increasing the pace and scale of restoration on the Okanogan-Wenatchee National Forest (OWNF) and strongly supports projects that help achieve this goal. For this reason, the NCWFHC supports the Midnight Restoration Project's quadruple need for action aimed at increasing resilience to disturbance and climate change, restoration toward

desired conditions to promote a resilient landscape, help protect key resources, and reduce risks to communities, forest visitors, and wildland firefighters, while also providing an opportunity to involve the community and increase local economic well-being; and maintaining access to the forest through a safe and efficient transportation system.

*Need #1 – Move current vegetation structure, spatial patterns, and composition toward desired reference conditions.*

We agree that forest structure classes need to move toward historic reference conditions. This includes increasing old forest, decreasing young dense forest, and maintaining the structure and vigor of stands within non-departed classes using both stand improvement (non-commercial) thinning and commercial thinning. We understand that, due to a lack of forest management and wildfire suppression, spatial patterning of forest patches has increased the potential extent of future disturbance and mortality and fragmented habitat, while the risk of high-severity fire has increased. We concur with the need to reestablish frequent, low severity fire to decrease fire return intervals and reduce the risk of uncharacteristic wildfire. Additionally, we agree that changing environmental conditions can lead to low vigor, low resistance to disturbance, and increased mortality. Regarding post-fire restoration, we support further reducing remaining fuel loads to reduce the risk of high-severity reburn and protecting regenerating seedlings, promoting fire- and drought-tolerant species, and maintaining conditions that facilitate seedling growth and survival.

We fully support site-specific treatments to maintain, enhance and help protect late-successional habitat and restore previously managed stands on a trajectory toward late successional habitat consistent with the LSR Assessment objectives; reduce riparian reserve fuels and restore under- and overstory composition within riparian reserves. Finally, we support restoring understory vegetation diversity and species shifts to assist in changing climate adaptation.

*Need #2 – Protect and maintain wildlife habitat and complex forest in strategic places.*

We support retaining and protecting the small amount of existing complex forest structure while creating dense, complex forests for sustainable and resilient habitat locations into the future as the climate changes. This includes developing and increasing the size and connectivity of high-quality northern spotted owl (NSO) nesting and roosting habitat. We also agree with the need to reduce the risk of high-severity wildfire in white-headed woodpecker habitat and increase lynx habitat while maintaining the remaining areas of bitterbrush for mule deer winter range.

We would like to see the specific mapping of the areas of habitat described in Need 2 in the Draft EA. We would also appreciate clarity on the resiliency of the existing habitat under changing climate. We could use some additional information about the location, stand characteristics, and plans to manage stands toward high-quality NSO nesting and roosting habitat in proximity to the historic and identified NSO habitat. We would also like more information about how the treatment will impact foraging and dispersal habitat of NSO.

*Need #3 – Provide an affordable, safe, and efficient transportation system and reduce sedimentation from roads on National Forest System lands.*

We concur with the need to modify roads to improve watershed health by reducing sedimentation; to provide a safe, affordable, reliable, and efficient transportation system; remove unauthorized roads, especially from the Sawtooth Inventoried Roadless Area (IRA); and to remove danger trees. However, we will not comment on bringing roads up to safety standards as this does not meet our shared mission of landscape restoration. We would like to better understand the scope of the impact area for danger tree removal along roads.

*Need #4 – Reduce fire risk to communities, reduce hazards along ingress/egress routes, and improve firefighting effectiveness within and adjacent to Wildland/Urban Interface.*

We fully support reducing community wildfire risk, especially within priority firesheds; reducing fuel loadings to increase ingress and egress for not only suppression but for forest visitors and the community; reducing dead/downed materials to diminish fireline intensity and modify fuels along ridges and roads to reduce crown fire initiation risk, while creating suppression anchor points; and protecting and sustaining NSO habitat and rare ecological features (i.e., Forest Plan Old Growth (FPOG)). We request the EA describe what infrastructure is already present within the project area from earlier suppression efforts (i.e., anchor points, fuel breaks, and firelines). Understanding how proposed actions will reduce wildfire risk in a landscape driven by topography and weather is important to us, and weighing these needs together is something we aim to support. We request that the EA describe the strategy behind these suppression efforts. We want to know what values are at risk and why the locations are considered strategic. Understanding the why and the rationale behind weighing this need with other needs will aid in determining trade-offs between needs.

While members of the collaborative support the need for fuel breaks, collaborative members have differing views about the appropriate prescriptions and strategic locations of fuels. We ask that details and rationale are clearly laid out within the EA. Collaborative members will be commenting individually on their concerns and interests.

### **Socio-economics**

We appreciate including “providing an opportunity to involve the community and increase local economic well-being” as a general need. Moving towards desired conditions is vitally important, and this work cannot be completed without the stability of local and regional economies from forest products. Existing mill infrastructure depends on the availability of raw materials from projects like this. This signals the importance of the existing and potential future local and regional manufacturing facilities and the forest health contractors supporting and performing watershed and forest health treatments on the ground.

### **Condition Based Management and Site-Specific Treatments**

We appreciate the Forest’s approach to using site-specific treatments where more controversial treatments are used, including LSR, riparian reserve, and owl habitat enhancement thinning and fuel break maintenance/development.

## **Forest Plan Amendments**

We generally support the proposed project-specific amendments of the Forest Plan and NWFP standards and guidelines (S&Gs) to meet the needs identified in the project area.

Regarding the silviculture treatments in LSR, we question whether this amendment is needed to allow the harvest of trees over 80 years within Late Successional Reserves, considering there is a wildfire risk reduction component that can meet the same objective. We request clarification on how this differs from the wildfire risk reduction being completed in other areas of the Forest (i.e., UWPP). As pointed out below, the Plan's prohibition on cutting 80-year-old and older stands in LSR only applies to forests located on the westside of the Cascades – not to the Midnight Restoration Project area in the Okanogan-Wenatchee National Forest, which is located entirely on the eastside of the Cascades.

Attachment A incorrectly assumes that the NWFP's 80-year standard applies to the LSRs in the Midnight Restoration Project area:

“Silviculture treatments in LSR: One NWFP S&G would be amended to silviculture treatments to meet habitat restoration and risk-reduction objectives in LSRs:

Silviculture (NWFP, p. C-12): There is no harvest allowed in stands over 80 years old.”<sup>1</sup>

However, the NWFP clearly states that the 80-year standard only applies to LSRs on the westside of the Cascades and that timber harvest in stands older than 80 years is allowed in LSRs east of the Cascades to reduce fire risk and fuels. Following are the relevant excerpts from the NWFP regarding silvicultural activities in LSRs:

“Activities permitted in the western and eastern portions of the northern spotted owl's range are described separately below....

**West of the Cascades** – There is no harvest allowed in stands over 80 years old....

**East of the Cascades** ... - Given the increased risk of fire in these areas due to lower moisture conditions and the rapid accumulation of fuels in the aftermath of insect outbreaks and drought, additional management activities are allowed in Late-Successional Reserves....”<sup>2</sup>

Since the 80-year standard does not apply to fire risk and fuel reduction management in the Midnight Restoration Project, it seems unnecessary and inappropriate to adopt a project-specific amendment to the NWFP's standards and guidelines for LSR management. Instead, the Forest Service just needs to follow the considerably less restrictive guidelines on pages C-12 and C-13 of the NWFP that are specifically designed for eastside forest LSRs.

## **Proposed Treatments**

Page 4 of the Proposed Treatments Descriptions states:

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<sup>1</sup> Scoping Letter Attachment A, p. 9.

<sup>2</sup> NWFP, Standards and Guidelines, p. C-12 (emphasis added).

*In Late-Successional Reserve, no live or dead trees 21.1-25" in diameter at breast height would be cut, except: 1) where a stand exceeds the minimum density objectives for trees over 20" in diameter at breast height as described in the Okanogan-Wenatchee National Forest Restoration Strategy (2012; 17 trees per acre in SEOC and SECC, 11 trees per acre in YFMS and UR); and 2) where needed to meet ecologically-based structural, composition, or spatial pattern objectives, and for hazard trees and as necessary for operations. No live or dead trees over 25" would be cut, except for hazard trees and as necessary for operations. Such cutting of trees >21" diameter would be minimized and designated by U.S. Forest Service silviculture staff, with brief documentation provided to the public.*

We support this effort to build public understanding and trust by having Forest Service silviculture staff designate where trees over 21" dbh would be cut under the above stated exceptions. It is important to note that elsewhere in the proposed treatments, there are inconsistencies with this approach. The main issue is that the guidelines on page four of the Proposed Treatment Description give the Forest broader scope to cut trees over 21" in diameter, but the individual treatment prescription limits it to only trees with dwarf mistletoe. The guidelines on page 4 seem to reflect the initial development of the preliminary proposed action by Resilient Forestry. These guidelines seem to differ from the guidelines for thinning prescriptions for each forest type, where cutting of trees 21 – 24.9" is limited to trees with dwarf mistletoe. For Dry forest Matrix thin, for example, it states: Trees 21-24.9" dbh may be removed only if they have a dwarf mistletoe rating (DMR)  $\geq 2$  (Hoffman 2004) and are within 40 feet of a healthy uninfected preferred leaf tree species with a minimum of 18" dbh. This is a much narrower guideline than the broader guideline above. We ask the Forest to consider whether it wants the flexibility contained on page four or only limit this to removing trees with dwarf mistletoe. Please note that there are diverging opinions when it comes to setting diameter limits. Expect to see comments from individual organizations regarding DBH limits. While some collaborative members feel strongly about having a range of limits as described above, others feel it important to preserve the opportunity to harvest trees of all sizes in these mistletoe infested Douglas fir stands.

### **Understory Thinning Prescription: Stand Improvement (SI) Thin**

We generally agree with the proposed Sawtooth IRA stand improvement thinning, though we want to note that there may be potential concerns from the broader public due to the number of acres. While the NCWFHC will not comment on resource impacts, do expect individual organizations to comment on specific areas where impacts to resources are concerning. Additionally, we support this work so long as no new roads are constructed to do said work. We would like to understand if roads within the IRA are planned for use to implement these treatments.

### **Matrix Thinning Prescriptions**

Page 5 of the Proposed Treatments Descriptions states that openings "would generally range from 1/2 to 1 acre but may increase up to 2 acres where heavy infestations of insect or disease are present, including (but not limited to) dwarf mistletoe infections with an average dwarf

mistletoe rating  $\geq 2$ , root rot, bark beetles, and defoliators.” We would like to know where the opening sizes came from, considering the NWFP allows for larger size openings.

### **Cold Forest Type**

We also noted that the cold forest type is not listed in the proposed prescriptions and would like to understand the intent of this. Perhaps it’s to protect lynx habitat?

### **Owl Enhancement Thinning**

There are some questions about the feasibility of this treatment type (current condition TPA versus desired TPA). Is there a plan to do field reconnaissance to see what the actual site conditions are?

### **Roads**

In general, we support decommissioning roads and roads going to lower levels of activity in the overall plan, especially where roads are densest and where another entry is not planned in the future. We would like a clear understanding of the net density of roads after the implementation of the proposed action.

#### *New Permanent Road Construction*

We understand a proposed admin access road of 2.7 miles, but we would like clarification on the purpose and intention of the 1.4 miles of new “closed” road. What is the rationale for keeping the 2.7 miles of roads for administration access rather than closing those roads for storage?

Are all closed roads hydrologically stabilized when put into storage? How will roads be closed in such a way that does not allow for illegal usage of the roads? We request clarity around the impacts of adding existing unauthorized roads to the National Forest System Roads layer within the Sawtooth Inventoried Roadless Area. We do not have concerns related to adding existing roads to the NFS roads layer when the purpose of those roads is for administration use or emergency egress.

### **General Comments**

#### *Dwarf Mistletoe*

We do not know the extent of dwarf mistletoe across the planning area, and we would like to understand the extent better so that we can better picture what the implementation will look like. We request clarity around the balance of fire risk reduction and habitat values and ask that you provide the best available science within the EA analysis. While we understand the intent of removing mistletoe, we would like to understand better how considerations are made where to maintain it on the landscape for ecological values.

#### *Northern Spotted Owl (NSO)*

We would like to understand better what the site-specific treatments in NSO habitat look like to best assess our level of comfort around these treatments. Specifically, we want to apply lessons learned from the Mission Project to make sure we have a higher level of understanding of what

these treatments will look like ahead of implementation. We request an opportunity to engage with the Forest and the broader public to have a marking example field day. We recommend designating a sample area within each treatment type to aid in understanding these treatments and to provide implementation training (regarding the complex and unique treatment types within the sale area- i.e., ICO, dwarf mistletoe).

#### *Proposed LSR dbh*

We would appreciate further information on how these treatments will be implemented so we have a better understanding of the distribution of impacts on old and large trees, multi-story structure, and NSO prey species such as the bushy-tailed woodrat and northern flying squirrel. Beyond the NSO, we are interested in knowing the scope of survey work that has been performed within the project area to account for focal wildlife species that rely on old, complex forests, such as northern goshawk, white-headed woodpecker, and American marten.

Additionally, we request a review of draft prescriptions to ensure a better understanding and to develop common expectations before implementation begins. We are interested in knowing if the residual stand density targets that are evaluated between IDT members are the expected densities at final harvest time or if they represent stand densities meant to last longer into the future past inevitable post-harvest disturbances such as windthrow, insect and disease, and wildfire.

#### *Trees Per Acre (TPA) Effects Analysis*

We request a meeting with IDT specialists ahead of the draft EA to help us understand how each specialist considers TPA in their analysis. For instance, whether their analysis is based on the assumption of TPA at the end of harvest; 10 years out; 20 years out, or otherwise.

#### *Other Aquatic Treatments*

Aquatic restoration activities to improve watershed health and aquatic habitat functions are a clear need in the project area. We understand aquatic restoration activities are currently being planned and implemented by the US Forest Service, Yakama Nation, and other partners in the project using programmatic NEPA tools. We recommend briefly mentioning and summarizing planned aquatic restoration work as you communicate with the public about this project, so they understand the US Forest Service is holistically addressing both the aquatic and vegetation restoration needs in the project area. Additionally, are there opportunities to improve on what was already done or other needs that won't be addressed in the near term?

Thank you for the opportunity to comment on behalf of the NCWFHC. We look forward to engaging with the MVRD before the release of the Draft EA to ensure the complexities of the proposed actions are well understood.

Sincerely,

A handwritten signature in black ink that reads "Mike Anderson". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mike Anderson, The Wilderness Society  
NCWFHC Co-Chair

A handwritten signature in blue ink that reads "Chris Branch". The signature is cursive and includes a long horizontal stroke at the end.

Chris Branch, Okanogan County Commissioner  
NCWFHC Co-Chair