



June 6, 2023

RE: Midnight Restoration Project - Scoping Comments

To Chris Furr and whom it may concern,

I am writing on behalf of Conservation Northwest to voice our support for the Midnight Restoration Project. We would like to thank the Methow Valley Ranger District (MVRD) for this opportunity to comment about our support, concerns, and recommendations for this project and we look forward to working together on finding solutions to the challenges. We appreciate the time and energy spent by the MVRD to continue this project with support from the North Central Washington Forest Health Collaborative and view the project development as a successful collaboration between stakeholders and the U.S. Forest Service (USFS).

The comments below reflect our support and concerns for different proposed actions associated with the Midnight Project, and we include some recommendations to alleviate those concerns. Only so much can be said in a comment letter, so we look forward to working together with the MVRD on solutions that will balance the purpose and needs of the project with wildlife habitat and forest resilience. Our organization has a long history of helping implement innovative and creative solutions to complicated natural resource issues, and we see forest restoration as a great opportunity for solutions-based approaches to wildlife habitat and multiple-use management.

Large, Old, and Dead Trees

Large Tree Definitions

We support the MVRD's decision to identify and report where large and old trees are proposed for harvest. We appreciate the attention toward old tree structure that may not be large, such as retaining 18" dbh lodgepole because of its age. However, we do not support the diameter and tree size definitions set in this project and would prefer tree size class definitions set by the Okanogan-Wenatchee Forest Restoration Strategy (FRS). We question why it is necessary to deviate from the FRS and do not support harvesting any tree over 21" in riparian reserves, late-successional reserves (LSR), or in identified spotted owl, white-headed woodpecker, American marten, or northern goshawk habitat.



Condition-based Management

We support flexible management and actions that reduce the risk of catastrophic wildfire to property, life, and habitat quality. We support the use of landscape evaluations to identify and determine the location, treatment, and forest types of vegetation structure classes throughout the project area. We are concerned with implementation using condition-based management within Matrix land, Late Successional Reserves, and Riparian Reserves. We are concerned that the independent decision-making associated with CBM increases miscommunication between the intent of the project, the objectives set in project Decisions, and the results of implementation. Tracking how well implementation meets the purpose and need of the project and the objectives set and analyzed under the Decision will result in successful adaptive management strategies. We recommend thorough compliance, implementation, effectiveness, and validation monitoring to ensure that project actions support the purpose and need.

Forest Health Conditions

We are concerned with the proposed large and old Douglas-fir tree removal associated with conditional management of forest health issues such as mistletoe infection and root rot. We are concerned that the condition used in most treatments for mistletoe, a Hawksworth rating >2, allows for more mistletoe removal than necessary for treating mistletoe. According to Hawksworth, mistletoe spreads slowly and individual infections only last 2-8 years. Even if a residual tree is heavily infected, it will still have minimal impact on the future presence of mistletoe if prescribed fire is implemented. Not only will some infections be killed after follow-up treatments with prescribed fire, but the new Douglas-fir cohort (the new mistletoe host) will also be reduced by prescribed fire. We are concerned with the perception that mistletoe can be successfully treated out of stands through mechanical harvest. Root rot is concerning as well because the mechanical treatments do not remove the roots that hold the infection and, in some cases, exacerbate the stand conditions that create root rot in stands adjacent to treated units. Trees with root rot or a mistletoe with a Hawksworth rating >2 should not be used as conditions to remove live, dying, or dead trees larger than 21" dbh.

Hazard Tree Removal

While we support increasing the safety and maintenance of USFS roads within the project area by removing hazards, we believe that hazard tree removal presents greater opportunities to retain habitat than what is currently proposed. Leaving high stumps and snags within a safe falling distance of the road edge maintains the largest, most important wood structure while eliminating the hazardous risk to the road. It is also important to consider that roads are often built near riparian areas, in draws, and where timber is productive, so roads exist adjacent to stands that can grow some of the largest diameter tree structure in the forest. Future fuelwood

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collection and harvest should be considered. Hazard trees along roads can contain significant wildlife habitat due to the prevalence of large diameter structure, so we recommend that any hazard tree removal plans perform a DecAID Analysis to assess the impact to large, old, and dead tree structure in any stands that will be impacted by the 251 proposed miles of hazard tree removal. Structural complexity, stand density, and large diameter wood could be emphasized in designated lynx travel corridors, pine marten habitat, and spotted owl habitat.

Stand Variability

Clear Prescription Language

We are supportive of the MVRD's prescriptions that include ICO language and a desire to retain resilient, complex structure. In contrast with recent forest project implementation, we would like to see more emphasis on retaining medium to large clumps. We also recommend writing strict stand densities in the prescription language rather than a range of densities that creates an unclear residual target. There is no incentive to retain the higher densities in a prescribed range, so one density target will help align stakeholders around a single, residual target.

Post-harvest Tree Mortality

As a result of observing current MVRD projects and subsequent monitoring reports, we recommend that residual stand density targets take into consideration post-harvest disturbance that will result in further tree mortality, thus reducing the residual stand density even further. Insects, fungi, diseases, windfall, mechanical damage, and prescribed fire are all factors contributing to lower stand densities than the residual target density set by the Decision. Resource specialists reviewing projects may not have a complete picture of these post-harvest disturbances and may be creating recommendations about future wildlife habitat, plant populations, and soil quality based off the analyzed target densities rather than the actual residual densities on the ground over time.

Tree Species Removal

While we understand that thinning or clearing whitewoods in a stand reduces fire risk, we also know that tree species diversity can be accomplished while reducing fire risk by leaving a few clumps and individual large trees of whitewood species. We do not recommend sanitizing any tree species completely out of a stand or unit. The thin bark associated with whitewood species is important for black-backed and three-toed woodpecker foraging, 20 to 50 year old stands are excellent spruce grouse habitat, and regenerating trees are vital for snowshoe hare and Canada lynx. Whitewood species have lower timber value and most residual trees are likely to be



eliminated after prescribed fire treatment anyways, leaving snags for black-backed woodpecker. Any dead or live whitewood that stands after post-harvest disturbances and a prescribed fire treatment should be taken as a sign of where whitewood clumps or large trees can persist.

Wildlife Habitat

Spotted Owl Habitat

While spotted owl surveys are required in LSR before treating owl habitat, we understand that the likelihood of encountering a spotted owl is extremely low given recent wildfire history and the significant impact of barred owls in the region. However, several other bird species associated with late-successional and old-growth forest structure are known to exist within the project area and may take advantage of the same stands, forest structure, and nest locations that are shared with spotted owls. We support project measures to make spotted owl habitat and nest sites more resilient to wildfire risk, and we recommend three considerations that will help maintain spotted owl habitat in a suitable habitat status for other species dependent on late-successional or old-growth forest such as northern goshawk, great gray owl, and American three-toed woodpecker.

First, we recommend conducting field surveys for northern goshawk and great gray owl nests throughout the project area before and after treatments. Finding nest locations for these species helps to design projects with sensitive nest sites in mind. Following the nest movement for these species will help avoid placing treatments in active nest areas that could impact a project after a signed Decision. Goshawks and great gray owls rely on similar nest and stand structure as spotted owls, but the impacts of barred owls and wildfire in adjacent habitat are less impactful. Monitoring these two species will aid future decisions about late-successional reserve management.

Second, we recommend giving a high amount of attention toward retaining the stand structure and nest features that spotted owls, northern goshawks, and great gray owls rely on. One important feature is the presence of mistletoe brooms in Douglas-fir that are often the only branched structure in the lower third of the canopy layer that is large enough to support raptor nests. We support Hawksworth rating >3 proposed in spotted owl habitat improvement thinning. Douglas-fir mistletoe is an important consideration because the forests in this proposed area do not typically grow trees with large enough branches to support nests. After chicks of spotted owls, great gray owls, and northern goshawks fledge, the presence of leaning snags, often known as “widow-makers” becomes vital for survival as the freshly fledged chicks use them to get off of the ground to safety. Without leaning snags, chicks are often preyed

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upon. Broken-top snags are also important for building nests, as well as large tree cavities for spotted owls. Broken tops of stumps and snags are also used by goshawks as plucking posts, a sort of butcher block for prey before items are brought to the chicks at the nest. If trees present a hazard to operators and machinery, we recommend high-stumping the hazard tree to maintain more complex structure.

Third, we recommend maintaining stands that are large and complex enough to offer year-round nesting, roosting, and foraging habitat in spotted owl habitat and LSRs. Nest predators such as ravens and jays are more likely to prey on eggs if stands are simple, small, and maximize forest edges. For spotted owls to nest and occupy available habitat, we recommend considering forest connectivity and continuity that is necessary for the species' dispersal and survival.

White-headed Woodpecker Habitat

We support reducing the risk of catastrophic wildfire to white-headed woodpecker habitat and thinning that will improve ponderosa pinecone masting, since pine seeds are an important food source for the species. We are concerned that the residual tree densities proposed in treatments associated with white-headed woodpecker habitat may not consider the post-harvest disturbances that could leave too few trees for the white-headed woodpecker habitat needs. Additionally, even the largest trees selected for desired ranges of variability are smaller than the trees that occurred at historic ranges variability, so the forests do not provide the same habitat despite achieving desired conditions similar to historic conditions. White-headed woodpeckers need enough large and old pine trees to sustain a continuous supply of snags for building nest cavities, typically ones created in old, broken-top snags resulting from heart rot. We recommend conducting field surveys for nests throughout the project area before and after treatments. Finding nest locations for these species helps to design projects with sensitive nest sites in mind. Decadence, insects, and sap are also important features of pine forests that should be retained in residual trees to sustain and promote future white-headed woodpecker habitat.

Canada Lynx and Snowshoe Hare Habitat

We support proposed actions in current and designated Canada lynx habitat that will maintain a shifting mosaic of lynx and snowshoe hare habitat through space and time. We support actions that will follow the Lynx Conservation Assessment Strategy (LCAS) and take into account the recommendations and habitat outlined by MVRD wildlife biology during the early planning phases of this project. Management actions in lynx habitat must consider where lynx and snowshoe hare habitat exist, not just where it is designated. We are concerned that the lack of language and considerations in the proposed action may not take lynx habitat into account as much as the LCAS guides. Currently, lynx are not designated as a focal species of the project,



despite occupying stand initiation, understory reinitiation, young-forest multistory, and old-forest multistory stands within the project area. Where lynx habitat is present or designated, we recommend maintaining at least 40% horizontal cover or 180 trees per acre over 8 feet tall as guided by the LCAS (including fuel breaks). Treatments in lynx habitat should retain and prefer boreal conifers such as lodgepole pine, Engelmann's spruce, and subalpine fir. Douglas-fir, ponderosa pine, and aspen and willow are also important snowshoe hare food, and therefore, lynx foraging habitat, in drier portions of lynx habitat. We do not support proposed fuel breaks that convert current, designated, and future lynx habitat into non-lynx habitat since some of the only current lynx habitat in designated LCAS Lynx Analysis Units exists along road shoulders.

Ungulate Habitat

We support the Forest Plan amendments about deer winter cover requirements and tree retention in mountain goat habitat. We applaud the MVRD for using more recent research about these topics. In the future, we recommend using mountain goat and bighorn sheep habitat as a reason to use prescribed fire and fuels reduction. While the habitats used of these two species represent difficult terrain, it is important to sustain rich grass and forb communities that are rejuvenated and maintained by wildfire. The topography and habitat of mountain goat and bighorn sheep are opportunities to create topographic fuel breaks that promote wildlife important to indigenous people, hunters, and the natural history of the Pacific Northwest.

Unique and Desired Vegetation

Western White Pine and White-bark Pine

We applaud the MVRD's direction to retain all western white pine. We recommend working with contractors to make sure western white pine can be identified from lodgepole pine since white pine may not be a common species to the project area, community, or contractors. We would like to collaborate on tagging/marking significant western white pine individuals in stands and would like to plant blister-rust resistant seedlings in appropriate sites. If there could be white-bark pine in addition to western white pine in the project area, then we suggest working with the Region to formulate a strategy to locate, protect, and collect cones from blister-rust resistant/elite trees of this federally threatened species. Funding for fuels reduction could also be applied to reduce wildfire risk to the white-bark pine.

Deciduous Trees and Shrubs

We are interested in exploring opportunities with the USFS to expand the presence of any deciduous species in the forest since hardwood species are highly valuable to wildlife, from



pollinators to ungulates to ruffed grouse. We commend actions in other ongoing projects that are currently releasing aspen through mechanical harvest or prescribed fire treatments, and we look forward to seeing more attention toward aspen stands. We suggest that aspen releases do not need every large tree removed from the site as we have observed in other projects, but just enough to increase daylight. An excellent example of the practice of releasing aspen but retaining mature structure is exemplified by the MVRD's girdling projects that do not remove any stems of older trees but still increase daylight for aspen colonies. We would like to work with the MVRD to improve the presence or diversity of deciduous tree species in the Midnight Project using deciduous starts, plugs, or cuttings to rehabilitate disturbed areas such as decommissioned roads and fire lines.

Forb and Grass Diversity

In addition to tree and shrub species, we are interested in understanding and applying greater attention towards native forb and grass species that are important botanical resources, first foods, and wildlife habitat. We suggest using landings, regraded road shoulders, dozer lines, and fire lines as opportunities to establish desired forbs and grasses. In heavily disturbed areas, such as gravel pits and quarries, we recommend establishing site-appropriate populations of wildflowers that benefit native pollinators. Species such as penstemons do not have significant roots that would affect future extraction or quality of material.

Thank you for the opportunity to comment on this forest restoration project and for taking the time to read our comments. We look forward to working together and learning more information as the Midnight Restoration Project develops.

Sincerely,

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