



State of Washington

DEPARTMENT OF FISH AND WILDLIFE REGION TWO

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June 9, 2023

Okanogan-Wenatchee National Forest  
Methow Valley Ranger District  
c/o Meg Trebon, Midnight Restoration Project Leader  
24 West Chewuch Road  
Winthrop, WA 98862

Dear Meg,

**SUBJECT: WDFW COMMENTS - MIDNIGHT RESTORATION PROJECT PUBLIC SCOPING**

On May 12, the Washington Department of Fish and Wildlife (WDFW) received notice from the Okanogan -Wenatchee National Forest Methow Valley Ranger District that it is accepting comments regarding the proposal referenced above. Thank you for the opportunity to comment on the scope of the Midnight Restoration Project. The Washington Department of Fish and Wildlife (WDFW) interest in this project is based on our agency's mandate to perpetuate fish, wildlife, and their habitat (RCW 77.04.012).

WDFW supports conducting restoration on the forest to move it towards a more historic range of variability, recognizing that catastrophic fire has played a large role in reshaping habitats throughout the Methow Valley over the last decade. However, the scale of the project and the overall uniformity of the prescriptions need to be carefully evaluated.

**What alternative methods would better meet the needs of the project than the proposed actions described in this letter that the Forest Service could consider and analyze?**

Riparian Reserves Treatment – WDFW supports thinning and patch clearcutting of smaller conifers to break up fuel continuity and reduce ladder fuels but we caution against over-reliance on conifers of smaller size class to provide adequate shade. The total conifer tree counts and basal area should skew farther towards the larger trees, which will provide more shade and contribute larger and more functional large wood pieces to the stream and to the riparian management zone (RMZ), as well as providing higher quality and more durable snags, when they fall or die. Leaving more, smaller trees, would mean more ladder fuels and greater likelihood of crown fires in the RMZs. We encourage the creation of patches of hardwoods in the RMZs to help break up fuel continuity of conifers.

Where feasible, WDFW also recommends utilizing large trees that need to be cut as aquatic restoration trees. We recommend the trees are knocked over or winched over by equipment

with root wads attached. This will decrease the mobility during higher flows and increase residence time for these key pieces in the streams.

WDFW recommends not to prioritize dead trees for removal in burned areas, which runs counter to current best available science (BAS) recommendations and reduces the economic viability of the management action. Instead, we recommend treating the stand as if all trees are live and thin accordingly, applying an optimized ratio of live to dead in each size class for snag creation (see Hessburg et al recent work) . A higher ratio of live trees harvested also increases the value and helps to make forest health treatments economically feasible.

We believe these recommendations are consistent with *Need #1 – Move current vegetation structure, spatial patterns, and composition toward desired reference conditions.*

**Is there any information about the project area which you believe is important in the context of the proposed activities that you would like the Forest Service to consider?**

For northern spotted owl (NSO), we recommend that the scope of the Midnight Restoration Project consider nesting, roosting, foraging (NRF) and dispersal habitat in the project vicinity, not just nesting and roosting. This additional information will provide important context for *Need #2 – Protect and maintain wildlife habitat and complex forest in strategic places.*

Please also consider that snags and downed wood requirements should be consistent with NSO needs. Overall, the strategy for protecting existing remnant patches of higher quality NSO habitat, despite their more vulnerable positions on the landscape, seems like a sound approach. This will help existing habitat on the landscape persist until more of the treated areas are developed into suitable NSO habitat over time.

**If you are concerned about the potential effects of any activities in this proposal, what concerns you and what changes you would like to see occur?**

Shaded Fuel Breaks - Ridgetops are very important travel corridors for many wildlife species, including lynx, so shaded fuel breaks or similar stand structures that retain plenty of trees are more appropriate than clearcuts in these locations. Lynx rarely cross openings of greater than 500 feet so we recommend when planning shaded fuel breaks at or above 4,000 feet to limit the width to 500 feet or less. We recommend designing stands to get fires to return to the ground and reduce intensity before they get to ridges. By doing so, shaded fuel breaks would allow protection of the habitat values of overhead cover on ridges while still facilitating fire control. Fuel reduction treatments in snowshoe hare and lynx habitat that could result in less than 40% horizontal cover or 180 trees per acre stand density, as recommended by the USFWS Lynx Conservation Assessment and Strategy, should be carefully evaluated. We recommend providing more information regarding thinning and fuel breaks and overlap with Lynx Management Zones, consistent with *Need #2 – Protect and maintain wildlife habitat and complex forest in strategic places.* Please consider a lynx/snowshoe hare habitat mosaic when

planning site-specific treatments at higher elevations within or adjacent to Lynx Management Zones.

**What National Forest System roads are important for your access to the project area? Are there roads that you would like to see closed or decommissioned at the end of the project? Are there other road-related concerns that you would like the Forest Service to consider?**

WDFW recommends including quantitative information on net changes in lengths of roads being added and decommissioned, locations for those changes, and for changes to road densities per unit area. We recommend including any opportunities for removing or improving stream crossings for aquatic organism passage and the subsequent benefit to fish and streams. Since roads relate directly to potential for unwanted sediment delivery to streams, we recommend considering the potential impacts and benefits to the aquatic environment consistent with *Need #3 – Provide an affordable, safe, and efficient transportation system and reduce sedimentation from roads on National Forest System lands.*

Overall, WDFW supports the need for prioritizing treatments to help move fire away from the Wildland/Urban Interface, consistent with *Need #4 – Reduce fire risk to communities, reduce hazards along ingress/egress routes, and improve firefighting effectiveness within and adjacent to Wildland/Urban Interface.* This work is consistent with WDFW's goals for forestry on our lands, moving the distribution of stand types and conditions across the landscape to a more sustainable reference condition.

Thank you for the opportunity to comment on the Midnight Restoration Project proposal. WDFW staff are available to provide further technical assistance. If you have any questions, please call me at 509-429-9285 or email [amanda.barg@dfw.wa.gov](mailto:amanda.barg@dfw.wa.gov).

Sincerely,

Amanda Barg  
Assistant Regional Habitat Program Manager, Region 2, WDFW

Cc: Carmen Andonaegui, Regional Habitat Program Manager, Region 2, WDFW  
Mallory Hirschler, Methow Habitat Biologist, Region 2, WDFW