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Keeping the Northwest Wild

Conservation Northwest Comment Letter for the Midnight Restoration Project Draft Environmental Assessment

Okanogan-Wenatchee National Forest
Methow Valley Ranger District
c/o Meg Trebon
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Winthrop, WA 98862

Dear Meg,

I am writing on behalf of Conservation Northwest and its members to voice our support, concerns, and recommendations for the draft environmental assessment (EA) of the Midnight Restoration project. We support and commend the collaboration between the Methow Valley Ranger District (MVRD) and the North Central Washington Forest Health Collaborative (NCWFHC) for the development of the purpose and need and proposed action. Thank you for requesting input on the Midnight Restoration project and for hosting a field trip during the phases of project development.

Conservation Northwest protects, connects, and restores wildlife habitat across Washington and British Columbia. We have been actively involved in forest management on the Okanogan-Wenatchee National Forest (OWNF) for over 30 years. Our organization has a long history of enhancing habitat and populations of culturally significant and at-risk species. We support ecosystem-based management approaches and recognize the Okanogan-Wenatchee Forest Restoration Strategy as the best guidance for implementing the best available science to create resilient forests for wildlife, wildfire, and climate change.

Conservation Northwest has supported the need to restore departed forest conditions in the upper Twisp River watershed since the project area was initially included as part of the Twisp project. We support the decision to re-evaluate this landscape after the 2021 Cedar Creek burned significant portions of the Midnight project area. We generally support the purpose and need for the Midnight project, but we are concerned about elements of the proposal that will not meet Need #3: *protect and maintain wildlife habitat and complex forest in strategic places*.

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Overstory Treatment Prescriptions

Stand Densities

We support the Midnight prescriptions that include language and a desire to retain resilient and complex structure using the ICO (individuals, clumps, and openings) method. In contrast with recent projects implemented on the MVRD, we would like to see more medium to large clumps where it is sustainable. In the future, we recommend trying to simplify some of the language in prescriptions and their exceptions, such as writing strict stand densities in the prescription rather than a range of densities that creates an unclear residual target. We support the absence of condition-based management and the use of site-specific management in land allocations such as LSR, Riparian Reserves, Inventoried Roadless Area, and the Owl Enhancement Thin units.

It is unclear in the draft EA how the treatments are designed from the landscape evaluation process. The leave tree densities under the proposed prescriptions are nearly identical to the historical ranges of variability (HRV) and departures identified in the landscape evaluation. Since HRV and departed conditions represent stand conditions from a time when trees were two to four times the diameter of the trees present in stands, it is important to design prescriptions for the currently available size classes. Until the trees grow larger diameters, prescriptions that immediately reduce the present stand density to historic stand densities will create vulnerable leave trees. Thinning beyond resilient dry forest densities creates greater regeneration that must be noncommercially thinned in the future. We are concerned that prescriptions are trying to achieve historical stand densities at the time of implementation rather than trying to grow trees to meet the size class of trees modeled in departed conditions.

Prescriptions that instantly reduce the present stand densities to historic stand densities do not factor post-harvest mortality. Residual stand density targets must consider 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 forces that will lower the stand densities below the desired density described in the EA. 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 on a described target densities rather than the eventual residual densities that will be on the ground over time.

Stand Diversity

We are concerned that the proposed prescriptions do not include enough clear language to maintain stand diversity. We do not recommend sanitizing any tree species completely out of a stand or unit. Under the proposed prescriptions, even mature whitewoods

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(subalpine fir, Engelmann's spruce, and lodgepole pine) will be eliminated from dry forest stands and many moist forest stands. While we understand the proposed action is intended to reduce wildfire risk, tree species diversity can be accomplished while reducing wildfire risk by designating a few clumps and individual large trees of whitewood species. The thin bark associated with whitewood species is vital for black-backed and three-toed woodpecker foraging; eruptive finches depend on mature spruce cones; 20- to 50-year-old whitewood stands represent prime spruce grouse habitat; and regenerating whitewood trees are vital for snowshoe hare and Canada lynx. Whitewood species have the lowest timber value and most residual trees will be eliminated after a prescribed fire, creating snags for black-backed woodpeckers, so there is no incentive to completely remove mature whitewoods.

We recommend ensuring that all participants involved in vegetation management understand which tree species are present in each unit. Despite the absence of grand fir and other true firs from nearly every acre of the project area, the Midnight project still mentions a desire to remove true firs from units. We recommend marking or flagging western white pine, as well as informing contractors about the differences between western white pine and lodgepole in units where western white pine is present.

We support strategies to increase aspen stands where clones are present in conifer stands, but it is unnecessary to remove every single conifer less than 21" DBH (21 inches diameter breast height) if it is within 50 feet of a few aspen clones. Releasing aspen can be accomplished without removing large conifers if daylight is still significantly increased. Retaining a few conifers amongst aspen will increase the diversity of the stand as the aspen grows around it.

Forest Health

Conservation Northwest supports reducing mistletoe in strategic ways that will lower the risk of infection at the landscape level while maintaining sufficient mistletoe populations for wildlife where it is most sustainable. Dwarf mistletoe is an important habitat feature for northern spotted owl, western gray squirrel, American goshawk, evening grosbeak, and dusky grouse. Applying the proposed Hawksworth rating system, heavy mistletoe infections of individual trees will be removed but mistletoe will remain present in every unit. A better strategy is pre-identifying the stands and trees where mistletoe is desired for associated wildlife species, retaining most of the worst infected trees because they represent the best wildlife habitat and cannot be processed by mills, and removing all trees with any mistletoe from adjacent stands to decrease the rate of spread. This will improve the heterogeneity of the mistletoe population and retain the largest or oldest Douglas-fir trees that the local public are concerned about retaining in dry forests.

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The distances to allow removing mistletoe-infected trees using the Hawksworth ratings has increased from scoping to the draft EA, including in the LSR treatments. The Matrix shaded fuel break sanitizes all mistletoe. According to Hawksworth, mistletoe spreads slowly and individual infections only last 2 to 8 years. Even if a residual tree is heavily infected, it will have minimal impact on the future presence of mistletoe if the proposed prescribed fire is implemented. Remaining infections will be killed after follow-up treatments with prescribed fire, as well as the new Douglas-fir cohort. As we noted in our scoping, we are increasingly concerned with the OWNF's perception that mistletoe will be successfully treated out of stands by removing the most heavily infected trees.

We do not understand why the Owl Enhancement Thin includes removing heavy mistletoe infections and root rot pockets when they are key habitat features for northern spotted owl and other species of wildlife dependent on late successional forest structure such as American goshawk. Like important stands of mistletoe, root diseases should be designated and retained in areas where it is most sustainable. Treatments requiring heavy machinery do not remove the roots that hold the root rot infection and, in some cases, exacerbate the stand conditions that create root disease in adjacent stands. Individual trees with root disease or a dwarf mistletoe infection with a Hawksworth rating >2 should not be used as rationale to remove live, dying, or dead trees greater than 21" DBH.

Specific Wildlife Considerations

Snags and Primary Excavator Habitat

While we support increasing the safety and maintenance of Forest Service roads within the project area by removing hazards, we believe that the hazard tree removal presents many more opportunities to retain habitat than what is currently proposed. The current proposal suggests removing trees with many wildlife habitat characteristics such as leans, splits, broken tops, and rot. 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 amongst some of the largest diameter tree structure in the entire forest. Future fuelwood collection and harvest should be considered. Structural complexity, stand density, and large diameter wood could be emphasized where roads intersect Riparian Reserves, lynx travel corridors, pine marten habitat, and spotted owl habitat.

In addition, we recommend that the OWNF begin a new process to identify the unique habitat features associated with each species of woodpecker. Lumping every species of woodpecker together as "primary cavity excavators" does not account for their unique life histories and habitat needs. While some woodpecker species are somewhat generalist

(hairy woodpecker and northern flicker), other species depend on very specific tree species, sizes, decay classes, and structural arrangements. The OWNF FRS identifies the individual habitat features for black-backed woodpecker and white-headed woodpecker, and we recommend that the next FRS revision and future proposed actions on the OWNF analyze habitat for American three-toed woodpecker, Wiliamson's sapsucker, red-naped sapsucker, pileated woodpecker, and Lewis' woodpecker.

Spotted Owl, White-headed Woodpecker, American Goshawk Habitat

The Draft Midnight EA proposes that a wildlife biologist will identify and designate important habitat features such as large and old snags, trees, and clumps for a variety of sensitive and at-risk wildlife, including the northern spotted owl, American goshawk, and white-headed woodpecker. At the same time, trees with the necessary defects and decadence for nesting spotted owl, American goshawk, and white-headed woodpecker are described as hazard trees and forest health problems that should be removed from stands. We do not understand why there are so many exceptions to remove large trees greater than 21" DBH, especially from the LSR. Given the size of the proposed project area, how will the habitat characteristics large, old, and dead trees be retained if they cannot be remotely identified by a biologist and especially where designation by prescription (DxP) or condition-based management provides less obvious expectations of what is to be a cut or leave tree?

We recommend marking leave trees to visually demonstrate how the prescriptions will be applied, preferably in units with site-specific management and sensitive wildlife considerations in the LSR and Owl Enhancement Thinning treatments. We believe marking is a good opportunity to involve the interested public and collaborative organizations such as Conservation Northwest would be more than willing to help organize. Marking and designating leave trees supports public trust, makes it easier to write prescriptions into contracts, and encourages mutual understanding between multiple stakeholders and our Forest Service partners.

Canada Lynx and Snowshoe Hare Habitat

Conservation Northwest supports the remote assessment of Canada lynx habitat and identification of small islands of habitat left amongst the 2018 Crescent Mountain and 2021 Cedar Creek wildfire scars. Given the recent wildfires, lynx habitat is already minimized in the Midnight landscape. Fuel reduction treatments in snowshoe hare and lynx habitat that result in less than 40% horizontal cover or fewer than 180 trees per acre stand density, as recommended by the United States Fish and Wildlife Service (USFWS) Lynx Conservation Assessment and Strategy (LCAS), will have negative impacts on the remaining snowshoe hare population and future lynx habitat. We support retaining the necessary dense habitat for lynx and snowshoe hare and recommend designating travel corridors and forage habitat where it aligns with other retentions of dense habitat such as

riparian zones, northern spotted owl habitat, or inaccessible terrain at high elevations. We recommend providing more information about the conditions, configuration, and amount of lynx habitat in each Lynx Analysis Unit. To minimize the impact on lynx and snowshoe hare habitat, sufficient habitat must be retained within each Lynx Analysis Unit and within travel corridors crossing the Twisp River valley floor.

We are concerned about the stand initiation treatment, its maintenance schedule, and its thinning criteria within Lynx Analysis Units. Maintenance is scheduled every 10 years if stands exceed 75 trees per acre of trees less than 10" DBH. This prescription will remove and prevent quality forage habitat from growing for Canada lynx. Quality forage habitat is comprised of coniferous trees that offer more than 40% horizontal cover or 180 trees per acre according to the LCAS.

Ungulate Habitat

On page 5 of the Draft Midnight EA, treatment descriptions restrict the maximum size of openings from ½ to 1 acre, with exceptions of up to 2 acres, but the Matrix allows for larger openings. In addition, the proposal applies a minimum 20% crown closure for any units dominated by dry Douglas-fir or ponderosa pine forest, but. Historical stands resilient for wildfire would have provided extremely variable canopy closures varying from 0-100% depending on the site within a stand. While we do not support creating large openings for commercial reasons, we support creating openings in dry forests to enhance understory vegetation and deciduous species.

Large openings would be suitable to enhance mountain goat, elk, or mule deer forage where xeric habitat or meadows limit growing dense stands of trees over a long time. In addition, designated openings may improve the ability to manage the spread of mistletoe from stands with valuable mistletoe habitat that is intentionally retained for wildlife.

Additional Critters

We suggest vegetation management specialists, in addition to the district wildlife biologist, meet with the USFWS and WDFW as early and often as possible. In addition to the wildlife species analyzed in this proposal, there are several more at-risk species that are currently or historically present in the Midnight project area. We recommend analyzing all sensitive, at-risk, and culturally important wildlife species.

Western gray squirrels are present in the lowest elevations of riparian and ponderosa pine habitat and golden eagles commonly nest on cliff faces across the project area. Fisher are currently recolonizing portions of the Sawtooth and Okanogan Ranges on either side of the Methow Valley, so it may be safe to assume they will be affected by the project. We recommend consulting with the Washington Department of Fish and Wildlife (WDFW) for locations and habitat currently occupied by these at-risk species.

Another species that should be analyzed as a part of future MVRD planning is the bighorn sheep. Bighorn sheep used to occupy portions of the Methow Valley and high elevations in the Sawtooth and Pasayten Wildernesses. Proposals should analyze how treatments in dry forests will benefit future bighorn sheep habitat, possibly encouraging recolonization.

We commend the positive effects this project will have for a wide variety of pollinators. Forest Service projects on the OWNF should adopt the Strategy to Protect State and Federally Recognized Bumblebee Species of Conservation Concern in Washington State as a method to identify how proposals may affect bumblebees. Many pollinators will likely benefit from the proposed Midnight Project and we support identifying exactly how different bumblebee species of concern may be affected.

Prescribed Burning

Conservation Northwest enthusiastically supports the use of prescribed fire as a forest restoration tool. We support and commend the MVRD for increasing the acres proposed for prescribed fire treatments from scoping to the draft EA. When possible, we support large-scale prescribed burning to accomplish large-scale fuel reductions and to take advantage of regulatory burn windows. We support actions that prioritize risk reduction around life and property within the Wildland Urban Interface. For future proposed projects, we recommend completing a memorandum of understanding with the Washington Department of Fish and Wildlife to complete cross-boundary burning since they are a significant landowning neighbor conducting prescribed burns adjacent to the OWNF.

Road Network Changes

Conservation Northwest supports projects that reduce road densities and lower levels of road activity. We support coordinated watershed planning that prioritizes decommissioning unnecessary roads, roads in areas with the highest road density, and roads that affect terrestrial and aquatic ecosystems the greatest. We support the road decommissioning, management level changes, and road alterations proposed in the Midnight Project. We support the proposed decommissioning of over 55 miles of road, closing an additional 18 miles, and removing 2.8 miles of road from the Inventoried Roadless Area.

Aquatic Restoration

Conservation Northwest supports aquatic actions such as improving aquatic organism passages, reducing road densities, reducing sediment delivery, and increasing large wood delivery. The upper Twisp River represents critical spawning habitat for a variety of native and anadromous fish, including the endangered species such as Columbia bull trout, Upper Columbia steelhead, and Upper Columbia Spring-run Chinook salmon. We support

designing riparian vegetation treatments that lower the risk of stand-replacing fire while maintaining shade and enhancing vegetation diversity. We support the aquatic actions proposed to reduce road miles, mitigate sediment delivery, and improve the Gilbert Trailhead. While the proposed actions will result in long-term benefits to aquatic species, we recommend conducting all activities within 100 feet of waterbodies during the specified in-water work window for the associated water body. This will reduce the likelihood of short-term impacts during spawning periods for endangered fish.

Project-Specific Amendments

The Midnight project proposes two project-specific amendments to the Northwest Forest Plan (NWFP) regarding the "Standards and Guidelines" that affect forest management in Late Successional Reserves (LSR). The first proposed amendment (NWFP C-12) concerns forest management of stands more than 80 years old in LSRs and the second proposed amendment (NWFP C-16) affects fuelwood gathering in LSRs. Conservation Northwest does not support either project-specific amendment and we suggest that the first proposed amendment (NWFP C-12) is unnecessary. Thinning in stands older than 80 years is already permitted in eastern Washington LSRs for hazardous fuel reduction. Is the intention to treat stands older than 80 years old for silvicultural reasons?

We could support the proposed amendment to collect fuelwood in LSRs (NWFP C-16) if additional information about the cumulative impacts to primary excavators, fisher, and Pacific marten were included in the draft environmental assessment and accompanying wildlife report. Unfortunately, fuelwood gathering has the greatest impact on the largest available dead wood. Given the proposed Forest-wide Hazard Tree Removal Project, the hazard tree removal included in Midnight Restoration project, and the fuel reduction in adjacent landscape-scale projects, the effects of removing dead wood should be evaluated for species with life histories dependent on its quality and abundance.

To be clear, Conservation Northwest supports the Regional LSR Assessment update and updates to the Northwest Forest Plan that will affect all LSRs in the OWNF, including the LSR within the Midnight Restoration project. The larger strategy involves all stakeholders affected by LSR management. We support reducing wildfire risk within the LSRs while maintaining viable late successional structure for a variety of wildlife species in dry, moist, and cold forests. We are supportive of the Regional strategy but it is unnecessary and inappropriate to adopt a project-specific amendment to the NWFP's standards and guidelines for LSR management.

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Thank you for the opportunity to comment on the Midnight Restoration Draft EA. We look forward to engaging with the MVRD on the challenges of creating and maintaining wildlife habitat while treating vegetation and reducing wildfire risk.

Sincerely,

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