

# Methow Valley Citizens Council



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Okanogan-Wenatchee National Forest  
Methow Valley Ranger District  
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Winthrop, WA 98862

May 16, 2024

Electronically submitted by  
web: <https://cara.fs2c.usda.gov/Public/CommentInput?project=63933>

## **Re: Midnight Restoration Project Proposed Action**

Dear Ms. Meg Trebon and/or appropriate US Forest Service Officer(s),  
On behalf of Methow Valley Citizen Council (MVCC) and its members, thank you for the opportunity to comment on the Midnight Restoration Project's Proposed Action. Since 1976, MVCC has raised a strong community voice for the protection of the Methow Valley's natural environment and rural character. MVCC represents several hundred members and over 1500 supporters who deeply value the Twisp Watershed and its special qualities.

The Twisp Watershed is cherished by local residents and visitors across the country for its clean water, near pristine conditions, wilderness qualities, and important fish and wildlife habitat. The Twisp River and its tributaries provide some of the highest quality fish and wildlife habitat in the lower 48 for a number of threatened and endangered species including steelhead, bull trout and chinook salmon, grizzly bears, wolves, wolverine, lynx and spotted owls.

The Twisp Watershed is the ancestral and traditional homeland of the Methow people, a constituent tribe of the Colville Confederated Tribes. MVCC advocates for enhanced access and participation by tribal members in cooperative land management. We support efforts to safeguard culturally significant sites and natural elements, while also facilitating the restoration of important traditional cultural practices, such as cultural burning.

As local community organization, with many members living, working, and recreating in the Twisp watershed, MVCC has participated extensively in the development of the concept for this proposal – with the intent of helping craft a scientifically sound, community support and ecologically-relevant forest restoration project. We led a working group of the North Central Washington Forest Health Collaborative to develop a pre-scoping landscape evaluation and proposal. We participated in pre-scoping field tours in 2022, submitted Scoping Period comments on June 10, 2023, and participated in a Midnight public tour in October 2023.

After extensive review, we respectfully submit the following comments below categorized by the Project's list Purpose and Need Statements:

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

We generally support the thinning of small and medium diameter trees and the increased use of prescribed fire. We also appreciate and support treatments during winter months and believe this is an important approach for preserving soil quality and should be considered across more of the project area.

We do have concerns about the continued application of exceptions that allow for large numbers of large trees to be cut in these landscape level projects. We also hold concerns about the intensity of some of the treatments in specific stand types, especially in stands that are already below the Historic Range of Variability. For example, it's unclear whether treatments are ecologically necessary in stands identified as Old Forest Multi Story (OFMS) and it is doubtful that the timber harvest prescription will achieve the stated goals and desired conditions. The Forest's recent LSRA update recommends focusing, "treatments largely outside of existing Large-Tree Dense-Forest (and existing "high quality" nesting-roosting habitat for Northern Spotted Owls) to reduce risk (page 81)." Protect underrepresented stand structures and thin around them, especially in valley bottoms and along north slopes where they are shown to be most sustainable.

### Large tree definition

The Forest Restoration Strategy (2012) defines large trees as 20" to 25" dbh, and very large trees as greater than 25" dbh. Whereas the Midnight Restoration Project Treatment Descriptions, May 2023, defines medium trees as 16" to 24.9" dbh and large trees as greater than or equal to 25" dbh. We recommend that the tree size definition for the Midnight Restoration Project be consistent with those tree size classes identified in the Forest Restoration Strategy and place an emphasis on protecting stands with large trees. This inconsistency was identified in our scoping period comments submitted June 8, 2023. That language is provided for reference. While we appreciate the clearer language in the prescriptions to focus on trees under 20.9", we have concerns about how the exceptions to this direction are applied. Based on the implementation of other projects such as the Mission Restoration Project, we have seen the exceptions applied too broadly, having a detrimental impact to the watershed and running counter to the restoration goals outlined in the project. In a watershed that is already deficient in large trees, retaining trees in the largest size class is critical. Further, the Infrastructure Investment and Jobs Act (IIJA) requires that any project using IIJA funding, such as the Midnight project "maximize the retention of large trees, as appropriate for the forest type, to the extent that the trees promote fire-resilient stands." Forest Restoration Strategy, Hotbox 7 – Defining large and old trees, page 103:

The potential for a site to grow large trees varies. Generally, conditions in the Okanogan- Wenatchee National Forest are such that large trees vary from 20-25 inches dbh. Thus, we recommend the following distinction in describing large trees:

Large.....20-25 inches dbh  
Very large....>25 inches dbh

Midnight Restoration Draft Environmental Analysis, page A-3:

In this project, "small" trees are defined as  $\leq 15.9$  inches dbh, "medium" trees are 16-24.9 inches dbh, and "large" trees are  $\geq 25$  inches dbh. These definitions are based on tree size classes identified in the Okanogan-Wenatchee National Forest Restoration Strategy (USDA Forest Service, 2012).

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## Large tree exceptions

The Midnight Restoration Project continues to allow far too many exceptions for the logging of large trees. According to the Methow Valley Ranger District's own evaluations, large trees are deficient in this landscape. There are too many exceptions that allow the cutting of large trees measuring between 20.9" to 24.9" (above the cut limit of 20.9"). Implementation on the Mission project shows that exceptions are regularly used.

There are very few ecological justifications for removing these large trees, and the justification of mistletoe as an exception is highly questionable – especially in Late Successional Reserves. We believe large trees over 20.9" should be retained unless they are true safety hazards. **We ask that the Forest Service remove all large tree exceptions in the document with the exception of individual safety hazards.** These safety exceptions should be well documented and reported. MVCC proposes any reports of trees cut over 20.9" be well documented and include an image of the tree and its immediate setting.

We question the premise of cutting down a large tree because they have dwarf mistletoe. Such trees should be managed in accordance with the USDA Forest Service Management Guide for Dwarf Mistletoe (Hoffman 2004) which calls for removing trees with a mistletoe rating above 3 rather than a rating above 2 as called for in the Midnight Project. Hoffman provides the following guidance "Commercial thinning: Select leave trees with a dwarf mistletoe rating of 3 or less, preferably those with infections in the lower crown."

Use of this exception should be rare, and not used as a justification to cut large numbers of big trees. Large trees with mistletoe should not be removed from Late Successional Reserves unless they are a stand wide problem. Additionally, throughout the Draft and its Specialist's Reports, where the mistletoe exception is referenced, some text omits, "and are within 50 feet of a healthy uninfected preferred leave tree species with a minimum of 18 inches dbh." We suggest listing the full text in all places and question why there's an increase in the distance to healthy uninfected trees from had been 40' to 50' and no further evidence-based recommendations are available to the best of our knowledge.

The following exceptions (Draft, page A-4) that allow cutting of trees between 20.9" and 24.9", once a minimum trees per acre are met, should be removed. The entire range of tree densities published in reference Table 8 (Forest Restoration Strategy, p.102), should be more carefully considered. In all cases, recommended tree density ranges are much larger including up to 66 trees per acre. In our examination, you would intervene in a stand's large tree development once that stand reaches or exceeds the maximum density objective. We support using the full range of tree densities as a guideline for tree-leaving requirements. We raised concerns last year about leave tree requirements not being met in units across the Mission Restoration Project and continue to question whether a true range of post timber harvest trees per acres targets can be met. The language is provided for your reference.

Midnight Restoration Draft Environmental Analysis, page A-4:

"In LSRs, no live or dead trees 21.0-24.9 inches dbh would be cut, except:

1. Where a stand exceeds the minimum density objectives for trees >20 inches dbh as described in the Restoration Strategy (USDA Forest Service, 2012); 17 TPA in stem exclusion open canopy and stem exclusion closed canopy, or 11 TPA in young forest multi-story and understory reinitiation);

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2. Where needed to meet ecologically based structural, composition, or spatial pattern objectives “Where needed to meet ecologically based structural composition, or spatial pattern objectives” (Appendix A, Common prescription)”

**Table 8. Density objectives for large, old trees by plant association groups and structure classes.** The following table is based on: stand reconstructions (Harrod et al. 1999, Youngblood et al. 2004, unpublished data on file at Okanogan-Wenatchee NF); quantitative definitions of structure classes (Hessburg et al 1999a.); and the relationship between overstory density and the establishment and growth of early seral trees (Becker and Corse 1997). Site-specific conditions and objectives can define desired density for project-area stands.

Structure class	Warm/dry Plant Association Groups		Mesic Plant Association Groups	
	Minimum trees/ac over 20 in dbh	Maximum trees/ac over 20 in dbh	Minimum trees/ac over 20 in dbh	Maximum trees/ac over 20 in dbh
Stand Initiation	0	16	0	16
Stem exclusion open canopy and closed canopy	17	34	17	66
Understory reinitiation, Young forest multi-story	11	25	11	25
Old Forest multi-story and single story	Minimum trees/ac over 25 in dbh			
	18			

**Forest Restoration Strategy, Table 8, page 102**

Where condition-based management is being proposed in this project, trees over 20.9” under the exception should be marked and recorded before harvest and total leave tree requirements of 70-105 trees per acre in various size classes achieved. In matrix units on the Mission Restoration Project, we have seen areas logged where no understory is kept which delays the development of a complex multi-story forest.

A [memo](#) from the Deputy Chief of the Forest Service reminded all Regional Foresters of the overriding direction set out by the IJA for projects similar to Midnight Restoration and applied this as guidance for the application in implementing the agency's 10-year strategy to address the wildfire crisis. In carrying out projects using IJA funding he wrote, “agencies shall prioritize projects that maximize the retention of large trees, as appropriate for the forest type, to the extent that the trees promote fire.

*To restore old forests on the Midnight Project, all large trees over 20.9” in diameter should be kept and exceptions for the cutting of larger trees should be closed except for true safety hazards trees which should be documented and reported.*

## Logging steep slopes

The Draft’s analysis of the impact of mechanized treatments on steep slopes is minimal and insufficient. The reference to BMPs that would mitigate impact is not available for review. Significant soil disturbance from tracked equipment and their skid roads and the subsequent deep rutting left behind from cable logging can be seen on the gentle to moderate slopes across the Mission Restoration Project and predict what will happen implementing the Midnight Restoration Project. Also, cable yarding impacted large and old trees that were girdled for use as anchors, during the Mission Restoration Project, emphasizing the importance of a clear proposal for how this will be avoided when logging on any slope in the Midnight Restoration Project We believe that the Forest should stick to their own relevant policy in the Land and Resource Management Plan for Okanogan National Forest (1989) which provides standards and guidelines (S&Gs) for long-term soil

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productivity, as follows, “13-9: Reduce soil displacement, ground yarding systems should not be used on sustained slopes in excess of 35%.” No ground-based timber harvesting or skidding should occur on slopes over 35%, over seasonally flowing or intermittent streams in the Project area, and we question the ability of heavy machinery to reach isolated areas of trees in the Upper Twisp River region where portions of the proposed treatments are located on benches above the valley floor. The proposed action would benefit if it better disclosed slope and topography as it related machine operability on a per unit basis, especially for site specific treatment in the LSRs.

As noted in the Draft, the volcanic ash mantle of project area soils is highly susceptible to erosion. A better description of what mitigation measures and BMPs associated with operating machinery on these soil types would allow the public to better understand what to expect in terms of potential ground disturbances. Without further explanation we question the discretion of the Timber Sale Administrator to properly designate logging systems necessary to limit impact to levels that have not been defined. These guidelines would be improved by adding images representing visually a range of expected conditions.

Decision criteria for thinning directs timber harvest on steep slopes to require twice as many trees to be cut than units that are flat to moderate in slope to be economically viable. This economic incentive conflicts with restoration objectives. Commercial logging on steep slopes should not be dependent on economic viability but should be carried out in a way that meets restoration objectives, even if it comes at an economic loss or must be covered by IJA funds.

It would be helpful to provide a chart that included each unit’s timber harvest prescriptions, stand structure class, plant association, acres and intended timber harvest method.

## Openings

We are concerned about the broad authority that timber harvests prescriptions grant for creating large, up to 2-acre openings, in any given site throughout LSR designations. The Proposed Action would be improved through determining and then disclosing the locations where conditions meet the following criteria, as outlined in the Draft, page A-6. “However, if more than 50% of trees have an average dwarf mistletoe rating  $\geq 2$  or have identified insect or disease issues such as root disease, bark beetle, or defoliator damage openings up to 2 acres may be warranted.” The criteria for insect and disease are vague and too broad to effectively locate such a condition on the ground. Regarding the mistletoe criteria, we wonder, to what extent will “50% of trees” be based on? Please improve these criteria to make it possible to identify these conditions in the project area.

Additionally, there are expected to be approximately 600 landings (that presumably will become openings) throughout the project area. This large number of landings in combination with new openings has the potential to significantly reduce overstory tree canopy. The impact of landings is not sufficiently discussed nor analyzed as part of the Proposed Action.

## Firewood Gathering

Our primary concern regarding the increase in public firewood gathering opportunities is the number of large snags that get removed by firewood cutters. As observed in numerous locations throughout the Mission Restoration Project, previously logged areas allow improved access to the interior of units where purposefully retained snags, often large and old, are cut by firewood cutters. Removal of such snags has dire implications for the land and animals living there. Considering the Project’s scale, there will be other places to cut firewood and policies for snag removal within the Midnight Restoration Project area should remain consistent with current Forest policy and question the need for project specific NWFP amendment that would allow firewood collection in specific LSR areas that have been closed since 1994.

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Snags in areas that meet the current criteria for firewood gathering, are within the footprint of previously logged area and are within 500' of the closest vehicle access point should be designated by signage to prohibit firewood cutting. Cull decks in these areas intended for firewood cutters should be clearly signed for firewood cutting.

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

There are opportunities to expand the amount of mature or late successional or even multi-story habitat for wildlife indicator species in the project area, while performing this work. This is called for in many threatened and endangered species recovery plans under the Endangered Species Act and many of these species' habitat is found in the Twisp Watershed. All of the actions described below in Need #2 of the Draft could benefit from improved mapping of designated species-specific Land Allocation Units or habitats which overlap areas designated for proposed treatments. It would also be helpful for optimizing the planned treatments to have an assessment of the resiliency of existing habitats at this time of a changing climate. The threat of wildfire should be more carefully evaluated and not be used broadly to justify degrading habitat. Rather the Project should protect the limited habitat for endangered species that remains and follow guidance set forth in recovery plans under the Endangered Species Act.

### Treatments that impact complex forest

We reject treatments that will result in the loss of old forest conditions. Namely in Old Forest Multi Story (OFMS), which is currently below its range of desired future condition (DFC). We suggest developing a more cohesive strategy that considers thinning trees strategically around the perimeter of old forest stands. Treatment in this forest type should avoid removing any overstory canopy and focus on prioritizing reducing surface fuels first and then ladder fuels secondly. Table 9 from the Vegetation Specialist Report, page 22, is provided for reference.

**Table 9. Project Current Acres Compared to Post-Treatment Acres by Structure Classes**

Structure Class	Current Acres	Post-Treatment Acres	Post-Treatment %*	% DFC*
YFMS	18,819	14,694	28%	1.4-16.5%
SEOC	11,417	14,906	29%	18.0-35.1%
SI	13,836	13,836	26%	1.1-14.0%
UR	2,459	3,194	6%	6.7-16.1%
SECC	1,067	968	2%	1.9-14.9%
OFMS	750	584	1%	1.5-15.6%
OFSS	13	179	0	1.4-5.1%
<b>Subtotal Forested</b>	<b>48,362</b>	<b>48,362</b>		
Non-forest	3,781	3,781		
<b>Totals</b>	<b>52,143</b>	<b>52,143</b>		

\*This total area is 99.8 % of the total project area of 53,009 acres.

### Treatments that impact Northern Spotted Owl habitat

We question why the Midnight Restoration Project unnecessarily would degrade suitable spotted owl habitat. The Wildlife Specialist Report states with northern spotted owl habitat reduced to 1,016 acres of nesting/roosting/foraging and 13,639 acres of dispersal in a 53,009-acre area, it may be even more unlikely

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that northern spotted owls would be able to successfully nest here. The critical habitat rule under the Endangered Species Act sets forth specific management direction for high quality owl habitat in the Eastern Cascades. We believe that the current prescriptions in the Midnight EA proposed in owl habitat are not consistent with the direction set forth under the critical habitat rule and the Endangered Species Act. We suggest a more careful approach that would retain the quality of existing owl habitat by thinning around the most durable sites and treating surface and ladder fuels rather than overstory treatment. Given that Spotted owl habitat is limited in the project area and should be a priority to keep as multi-story forest.

## Treatments that impact lynx habitat

Lynx are a federally listed threatened species under the Endangered Species Act. Recent wildfires have significantly reduced lynx habitat in the project area. 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.

## Treatment that impact White-headed woodpecker habitat

We support the inclusion of treatments that maintain suitable conditions for the White-headed woodpecker, but only within locations best suited for White-headed woodpecker habitat, which is not shown on any of the maps provided in the Draft. White-headed woodpecker habitat focused treatments need only to occur on lower elevation sites in Little Bridge Creek, outside of LSR.

## Treatments that impact Riparian Reserves

We're concerned about the proposed approach to timber harvest in Riparian Reserves. While we understand there are opportunities to harvest timber in Riparian Reserves, we find it hard to understand Table B-19, Treatment Buffers in Riparian Reserves (Draft page B-33). We are curious how to interpret that absence of data for fish bearing streams and their corresponding commercial harvest buffer column. How is the District defining site potential tree heights and what are some examples of those heights? While small commercial harvest buffers might be acceptable on upland dry sites, they are too heavy-handed for these locations and could have the potential for adverse effects to Endangered Species Act-listed fish species within the project area. We support the thinning of small diameter, understory trees where it is necessary to meet your risk reduction objectives in Riparian Reserves.

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

We appreciate that the district has removed from the current proposal the building of any new, permanent roads. Decommissioning as many roads (of which only 6% are currently open roads in the project area) as possible in the project area will have a beneficial impact. That impact, however, will be diminished by the proposal to re-open approximately 60 miles of currently closed and unauthorized roads. Closed and unauthorized roads are presently in a range of conditions from drivable or walkable to revegetated and not hydrologically connected. The Forest cannot assume reopening of closed and unauthorized roads will not have an effect and needs to analyze their impact more closely. We disagree with the need to reopen currently closed and unauthorized roads in the LSR, and we request that this proposal be rejected. In areas outside of the LSR where closed and unauthorized roads will be open for timber harvest purposes, we suggest disclosing a schedule of when they will be reopened, used and decommissioned. All currently closed and unauthorized roads should be decommissioned as the project ends, unless there is a need for administrative use.

We are also concerned about the compounding effects of 10.4 miles of new temporary roads and reject the need for building any new temporary roads in LSR as proposed in Canyon Creek. Also, if temporary roads are determined to be required, there should be dedicated funding in the budget to remove them when the project is completed. The Draft's analysis of Scoping period issues and concerns related to the potential impact of opening currently closed road, completely ignores this issue and fails to mention that the concerns have been voiced.

The Transportation maps in the Draft EA and its associated Specialist Reports are too small for much of the important information to be deciphered. We suggest additional maps zooming in on important areas to allow for more explicit detail to be comprehensible.

## **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 support the thinning of small and medium sized trees, followed up by prescribed burning. But much of the Draft's identified actions, including the need for cutting dominant trees, are based on and justified by the results obtained from model using peak fire season weather conditions, which are the most severe weather forecasts for this region. Wildfires burn at different severities depending on different weather conditions, and we would encourage the District to re-evaluate the threat of wildfire under a larger suite of scenarios to use as a basis for analyzing the Proposed Alternative's effects.

We continue to question the need for new shaded fuel breaks in the upper Twisp River and throughout the LSRs where a decrease in canopy cover could result in significant environmental consequences. Many of the newly proposed fuel breaks are far away from any identified Wildland Urban Interface boundaries. Considering the extent of timber harvest landings that will be created in the LSR, there should be further investigation as part of a larger study to consider optimally locating predetermined landings that would then become anchor points for fighting fires. The maintenance of existing shaded fuel breaks so they serve as future fuel breaks is important. And much like thinning should be followed by burning, shaded fuel breaks also need to be maintained with prescribed burning overtime to be effective.

We question the practicality of new shaded fuel breaks along newly built temporary roads that will then be decommissioned post project. These are found mainly in Canyon Creek, and also in areas where new temporary roads are proposed in Little Bridge Creek. Where new shaded fuel breaks intersect with a



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proposed timber harvest unit, the prescription of the timber harvest unit should prevail – especially in areas of complex old forest stands to avoid fragmenting habitat any further.

To avoid the building and use of unauthorized motorized trails, machine fire lines should be limited to the interior of prescribed burn units as much as is operationally possible. This would effectively limit the dozerline's connection to any roadside access points (especially along ridgetops). Using handlines to connect roads to interior dozerlines would limit access, and they could be more easily restored once fire treatment was completed.

The proposed action would benefit from shifting its focus away from preventing the impacts of catastrophic wildfire to establishing fire resiliency. Fire prevention is one widely recognized aspect of reducing fire risk that is not analyzed nor discussed in the Draft. To address human caused wildfires, the District might consider seasonal closures and/or public outreach during times of high fire danger. Additionally, a better understanding of how shaded fuel breaks align with previous PODs, past wildfire, project dozerlines, and treatments being implemented in neighboring projects, will enhance our understanding of their need.

## ***Additional comment:***

### Public Involvement and Conditional Based Management

“NEPA procedures must ensure that environmental information is available to public officials and citizens before decisions are made and before actions are taken. The information must be of high quality. Accurate scientific analysis, expert agency comments, and public scrutiny are essential to implementing NEPA 40 C.F.R. § 1500.1”

Project-level NEPA procedures require the provision of enough detail to allow for public input before responsible officials issue a decision. Reliance on such broad analyses can deprive the public of information and transparency in decision-making. While it is appreciated that Condition Based Management (CBM) allows some flexible management opportunities such as adjusting unit boundaries, it leaves too much discretion for operational interpretations and could be at odds with NEPA procedures. Currently, the decision criteria laid out in the Draft are too broad to evaluate environmental impacts. These criteria do not allow the analysis of specific resource conditions and the potential environmental consequences, such as the type of harvesting methods that will be used in those locations.

To fully comply with the requirements of NEPA, we recommend the Forest Service abandon its CBM approach which lacks sufficient detail to understand specific impacts and provide relevant public comment on those impacts. Instead, we recommend the Forest Service explicitly recognize the Midnight Draft EA as baseline planning document and commit to conducting the requisite site-specific analysis for individual treatment projects with additional opportunities for public comment as the project unfolds over the 20-year timeline.

Thank you for considering our comments. Feel free to contact us with any questions.

Sincerely,



Jasmine Minbashian, Executive Director