

May 16, 2024

Cynthia Sandeno, Acting Forest Supervisor
% Meg Trebon
Methow Valley Ranger District
24 W. Chewuch Rd
Winthrop, WA 98862

Dear Meg Trebon and the Methow Valley Ranger District,

Thank you for the opportunity to comment on the Midnight Restoration Project. As a small HOA immediately downstream and adjacent to the Midnight Restoration Project along Wolf Creek, we support the need of this project to protect wildlife habitat, improve forest structure and reduce fire risk to nearby communities. As an HOA, we are already engaging in our own understory thinning to reduce fire risk and improve the rich wildlife habitat surrounding us. While we support the Stand Improvement thin treatments in the Wolf Creek drainage, we are concerned about some of the commercial overstory treatments planned in the Twisp River watershed.

We are encouraged to see the Stand Improvement prescriptions on the south side of Wolf Creek. We would like to see that any thinning is accompanied by prescribed burns. There are many dead and downed trees in this drainage and we know that thinning and burning together can improve the resilience of the forest to future wildfires. Thinning alone without burning leaves a substantial fuel source on the forest floor. As an HOA we are looking forward to eventually conducting our own prescribed burns on our property as the North Cascades Prescribed Burn Association establishes and grows.

We would like to see areas upstream of our property on the north side of Wolf Creek within the project area added to the Stand Improvement Thin as well. While much of this area is shrub steppe, there are also forest stands that are immediately adjacent to our HOA property (due west on the north side of the creek). We encourage the Methow Valley Ranger District to closely consider how forest health and fire does not see boundaries and to reach out to adjacent landowners about implementing forest treatments that connect across public and private boundaries. Sun Mountain Lodge is a prime example of a large landowner who has dense forest immediately abutting forest service land (and directly across the creek from our joint property) that would benefit from understory thinning and prescribed burning. We would encourage the Ranger District to reach out to the Sun Mountain Lodge to explore options to create connectivity through this forest.

Our concerns in this Midnight Project lie with some of the commercial treatments planned in other parts of the project, especially in the Middle and Upper Twisp Watershed. We know that large and old trees are deficient on the landscape and take a very long time to grow in our climate. As a "restoration" project every effort should be made to retain these trees and exceptions should be closed for the cutting of trees between 21-25". We also know from work

on our own site how important it is to balance thinning out small young trees to reduce fire risk and give larger trees space while still retaining enough shade cover to keep the understory cooler and moister. On commercial thinning units we encourage the ranger district to leave enough trees of multiple size classes to maintain adequate shade on the forest floor and help give the forest a headstart to becoming complex and multi-story.

With steep slopes on our site, we are also cognizant of how easy it is to cause erosion and damage. We encourage the District to carefully consider the impact commercial logging on steep slopes can have on fragile soils and to consider only understory treatments on steep slopes over 45 degrees.

As an HOA we have been committed to retaining wildlife habitat on the acreage we steward. We encourage the Ranger District to consider how their treatments will impact sensitive wildlife habitat, especially of lynx and spotted owl. These species benefit from denser forests that should be retained. Fire risk can be reduced in these areas through Stand Improvement thins. Thank you for considering our comment on this important forest restoration project.

Sincerely,

Wolf Creek BC Owners Association

Members:

Sara Conover

Doug Robnett

Paige Devlin

Nick Littman

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Peter Gurche

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