Data Submitted (UTC 11): 6/9/2023 11:37:09 PM
First name: JASMINE
Last name: MINBASHIAN
Organization: Methow Valley Citizens Council
Title: Executive Director
Comments: Please accept the attached letter on behalf of the Methow Valley Citizens Council (also pasted below).

Meg Trebon
Okanogan-Wenatchee National Forest
Methow Valley Ranger District
24 West Chewuch Road
Winthrop, WA 98862.

June 8, 2023

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. MVCC raises a strong community voice for the protection of the Methow Valley's natural environment and rural character. MVCC and its membership are located in the foothills along the eastern slopes of the North Cascades in North Central Washington state. Residents in these nearby rural communities are within close proximity, sometimes less than a 10-minute drive of areas being considered for treatment, making Midnight Restoration Project area of special importance.

MVCC was involved in conceptualizing an approach to restoration in the Upper and Middle Twisp Watershed. As chair of the Midnight project subcommittee for the Northcentral Washington Forest Health Collaborative, I appreciated the opportunity to work with the Forest Service to understand the needs and parameters of the agency in implementing this project. We look forward to continuing to work with agency staff to develop and implement successful forest restoration in the Twisp Watershed. To this end, please consider our comments below under each Project need.

Need # 1

We support the return of fire to the landscape and recognize the need to thin smaller diameter trees. Prescribed fire is a crucial part of the restoration of these forests and numerous studies show that thinning should be followed by burning. We are especially interested in the scheduling prescribed fire within a timeframe that complements mechanized treatments and reduces the likelihood of high severity fire. Noncommercial fuels reduction work to improve stand conditions and make the forest more fire resilient are needed in many places throughout this project area.

With the primary goal of this project being ecological restoration, and federal funding available to offset, income from any log sales should be a byproduct of the project, not a driving purpose or need. The agency should consider using separate contractors (other than log purchasers) to implement the restoration prescriptions. Using a contractor who has been trained and skilled in ecological-based forestry would increase the success of the project and remove any commercial incentive to cut larger ecologically valuable trees. If this is not an option, then agency biologists and foresters should be involved in marking and designating the prescription for each stand

type - creating a demonstration plot that can serve as training for the contractor.

Large Tree Definitions

The old tree component of most dry and mesic forest ecosystems is lacking, largely because past selective harvesting focused on the removal of these trees and so we are concerned about the project's deviation from the large tree definition identified in the Forest Restoration Strategy (USDA 2012). To transition and grow more old forest structures, as defined in the need, keeping all large and old trees should be a priority. The Forest Restoration Strategy defines large trees as 20" to 25" dbh, and very large trees as greater than 25" dbh. However, the Midnight Restoration Project Treatment Description defines medium trees as 16" to 24.9" dbh, and large trees as greater than or equal to 25" dbh. We would like to see the tree size definition for Midnight remain consistent with those tree size classes identified in the Forest Restoration Strategy.

A recent memo from the Deputy Chief of the Forest Service reminded all Regional Foresters of the overriding direction set out by the Infrastructure Investment and Jobs Act (IIJA) for projects and applied this as guidance for the application in implementing the agency's 10-year fuels strategy. In carrying out projects using IIJA funding, "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-resilient stands." To restore old forests with large trees on the Midnight Project, all large trees over 20" in diameter should be retained.

Large trees with dwarf mistletoe have value for wildlife when managed in accordance with the USDA Forest Service Management Guide for Dwarf Mistletoe. Stands should be surveyed for the level of dwarf mistletoe infestation before treatment is prescribed. Treatment prescriptions that include removing large (21-24.9" dbh) trees with dwarf mistletoe ratings greater than or equal to 2 are inconsistent with the management strategies provided in USDA Forest Service Management Guide for Dwarf Mistletoe on page 4 which calls for leaving tree if they have a mistletoe rating of 3 or less. Levels of Dwarf Mistletoe on the Midnight Project are often within the natural range of variability and where they are elevated the proposed action should be consistent with the management guide. We appreciate the District's effort to document any large trees that may be cut as an ecological exception and providing that information to the public. We would, however, like to have a better understanding of how broadly this exception will be applied prior to the implementation of the project.

Condition Based Management

Condition based management allows for too much unpredictability given the interdisciplinary and multidimensional nature of this large restoration project. While we acknowledge the need for flexibility, the costs of the lack of transparency and the potential unmet expectations as experienced in the Mission Project make this an ineffective tool. Across prescriptions, minimum leave tree requirements should account for mortality from blowdown and prescribed burning treatments. Significant changes in the field review should be presented to the public and additional review considered prior to implementation. If condition-based management is used, adaptive management should be available as a tool to correct course in places where implementation is not meeting the purpose and need.

Post-fire Treatments

Bringing mechanized equipment into post-fire landscapes damages fragile soils. Any work intended to help these forests recover from fire should be completed by hand. More detail should be given in the Environmental Assessment about how treatments will impact fragile post-fire forests.

Need #2

We support the need to protect and maintain wildlife habitat and complex forest in strategic places. Resilient

Forestry's Landscape Evaluation and Prescription (Jeronimo 2022) provides an appropriate framework to guide spatially explicit locations that protect and maintain high-quality habitat.

As specified in the Resilient Forestry report: "There is a need across the landscape to consolidate white-headed woodpecker habitat through restoration of open-canopy dry pine forests, especially in Little Bridge Creek. There are variable needs for northern spotted owl habitat, but an emphasis is retaining dense, complex forest where it will be sustainable into the future given threats from fire and drought. Parts of Upper Twisp and north-facing slopes of Middle Twisp offer the best options…. Protecting WWP habitat is likely to involve thinning and prescribed fire treatments, while protecting NSO habitat is more often accomplished by treating around the most important locations to provide a buffer from fire." (Jeronimo 2022)

We would like to see current and future high-quality habitat identified and mapped out. As part of site specificity, we would like tree marking completed in units that overlap with areas of current and future high-quality habitat (i.e. open pine forests with solitary large trees, dense forests of tall trees, riparian areas etc.).

Ridgetops are vital travel corridors, thus treatments in these areas should retain plenty of trees to maintain habitat. Ridgetop thinning is often used for fire control, however, designing treatments to get fires to the ground before they get to ridges can help the Project retain valuable habitat on ridgetops while still facilitating fire control.

Treatments in riparian areas need to fit the site's conditions and be placed in strategic locations with input from fish and wildlife biologists. Riparian Reserves treatments should consider that these areas will also serve as connectivity corridors among the Late-Successional Reserve. Any ground based mechanical thinning in Riparian Reserves should only occur in the winter months as mitigation measures to log outside of winter are unachievable.

Need #3

We support efforts to improve watershed health and provide a transportation system that is affordable, safe, and efficient for administration, public use, and protection of NFS lands. While we acknowledge the effort to decommission 52 miles of road, we're concerned about the 4 new miles of permanent new road construction proposed in this Project. These roads should be decommissioned because they allow for off-road access and dispersed camping in Late Successional Reserves. To be eligible for funding using the Infrastructure and Investment Jobs Act (IIJA), no new permanent roads can be built. The Methow Valley Ranger District should consider how to implement this project with no new road construction including the 2.7 miles of ridgetop road in the Little Bridge Creek drainage. All currently closed roads should be decommissioned post-project. Additionally, on the provided maps, many small spur roads in the middle and upper Twisp that are currently closed are displayed as open post-project.

Need #4

We understand that one purpose of this project is to reduce fire risk to communities, reduce hazards along ingress/egress routes and improve firefighting effectiveness within and adjacent to Wildland/Urban Interface. Properly thinning and burning the landscape as a whole will help this landscape be more resilient to fire and far less likely to carry fire quickly at high severities. As extensive scientific research indicates thinning small diameter trees followed by regular prescribed burning is one of the most effective ways to control fire on the landscape. With properly implemented thinning and burning, linear, unnatural shaded fuel breaks (areas along roads that are thinned more intensively) become unnecessary as there are numerous anchor and control points in the forest itself from which to fight fire.

Where shaded fuel breaks intersect with a treatment unit, the prescription of the unit should prevail. In areas where no treatment need has been identified (for eg in multi-story complex older forest) there should not be fuel

breaks created to maintain stand structure integrity. Shaded fuel breaks when not maintained, can fill in with dense understory fuels and become more of a fire threat. These fuel breaks need to be maintained with fire overtime to be effective. Is there a plan for maintaining these fuel breaks into the future? We recommend that fuel breaks should be prioritized closer to the WUI - and not in the Upper Watershed. Prescription

Multiple Action Alternatives

We urge the Methow Valley Ranger District to use public scoping comments to help develop multiple action alternatives that meet both ecological and community needs. One of these alternatives should analyze the use of only implementing stand improvement thins and prescribed burn treatments in the upper Twisp watershed.

Thank you for considering our comments. Please feel free to reach out to us with any questions.

Sincerely,

Jasmine Minbashian,
Executive Director