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First name: Claire
Last name: Thompson
Organization: North Central Washington Forest Health Collaborative
Title: Coordinator
Comments: Dear Meg,

Thank you for requesting input on the Methow Valley Ranger District's (MVRD) Midnight Restoration Project Area draft environmental assessment. The North Central Washington Forest Health Collaborative (NCWFHC) appreciates the MVRD's continued engagement on this project and participation in our various meetings and field trips. We have focused our questions and concerns to get us closer to a shared understanding of how this project will look once implemented. Developing this shared understanding helps us have a no-surprises approach to this work, reducing conflict and resulting in faster and better project implementation.

We look forward to continuing our engagement with you and your staff through the remainder of the planning, implementation, and monitoring phases of the Midnight Restoration project.

Purpose and Need
Since the 2021 Cedar Creek Fire impacted portions of the previously proposed Twisp Project, the NCWFHC has supported a separate proposed action and analysis in the upper Twisp River watershed titled the Midnight Restoration project. We understand the importance of treating uncharacteristic fuels across the Okanogan-Wenatchee National Forest as well as the complex land management allocations that must be navigated to reduce hazardous fuels, restore forest and watershed resilience, and implement ecological treatments. The NCWFHC generally supports the purpose and need of the Midnight project.

In support of this project, the NCWFHC worked with Resilient Forestry and the MVRD to submit a proposed action for Midnight that followed the Okanogan-Wenatchee Forest Restoration Strategy (FRS). The NCWFHC believes the FRS provides the most comprehensive and up-to-date strategy for reducing the risk of uncharacteristic wildfire while maintaining ecologically important features unique to the OWNF landscape. We believe projects that follow the FRS and adhere to the best available science will be the most successful.

Project Specific Amendments
Why does the proposal include a second project-specific Forest amendment?
The Midnight project proposes two project-specific amendments to the Northwest Forest Plan (NWFP) regarding the "Standards and Guidelines" that affect forest management in the Late Successional Reserve (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. Our collaborative supports forest amendments that will increase the efficiency of NEPA and implement the best available science. Of the two proposed NWFP amendments, we question whether the amendment to thin in stands older than 80 years old (NWFP C-12) is necessary. Since thinning in stands older than 80 years is already permitted in eastern Washington LSRs for hazardous fuel reduction, we do not understand why it is necessary to propose this amendment unless stands older than 80 years old are being harvested for silvicultural reasons. Please clarify how and where silvicultural treatments may be proposed in LSR and demonstrate that the proposed amendment will not be a barrier to implementing the Midnight project.

To clarify, the NCWFHC is supportive of the Regional LSR Assessment update that will affect all LSRs in the OWNF, including the LSR within the Midnight Project. It is our desire to see Forest Service staff achieve greater thinning and burning in LSRs than has been feasible in the last 20 years while maintaining the late successional characteristics that are important for habitat. We are supportive of the Regional strategy but it seems

unnecessary and inappropriate to adopt a project-specific amendment to the NWFP's standards and guidelines for LSR management.

Roads

How much funding is already allocated to the proposed changes in the road network?

The NCWFHC supports projects that reduce net road densities and lower levels of road activity. We believe in the importance of forest roads to implement projects, plan recreational opportunities, and provide safe travel, but we are also concerned about the adverse environmental effects from poorly situated road construction, maintenance, and infrastructure. 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.

Aquatics

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. NCWFHC supports aquatic actions such as improving aquatic organism passages, reducing road densities, reducing sediment delivery, and increasing large wood delivery. 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.

Prescribed Burning

The NCWFHC is encouraged and supportive to see the proposed use of prescribed fire as a primary tool and a component of other treatments to reduce noncommercial surface fuels. We support the increase in proposed burn acres from Scoping to the Draft EA and our collaborative is in full support of using fire as a beneficial forest management tool whenever it is feasible and safe. 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 communities, important ingress/egress, and within the Wildland Urban Interface.

Cultural Burning

In addition to prescribed burning performed by agency crews, the NCWFHC would support an increase in other types of beneficial fire such as managed wildfire or cultural burning as part of this project. Since the project falls within the geography of the OWNF's Collaborative Forest Landscape Restoration Program (CFLRP), there are opportunities to connect Tribes and families with the location of culturally significant plants important for multiple uses including ceremonies, spirituality, building, crafting, and nutrition. The CFLRP monitoring program for culturally significant foods and communication with Tribes during project development are opportunities to share locations of culturally significant plants, as well as proposed thinning and burning treatments that will revitalize habitat for culturally significant plants, quality fisheries, or hunting opportunities.

Carbon and Greenhouse Gas Assessment

We support the addition of a greenhouse gas (GHG) assessment that evaluates short-term emissions from project implementation, retention of large and old trees, and estimates of long-term carbon uptake following the new growth of trees. The Council on Environmental Quality (CEQ) published the National Environmental Policy Act (NEPA) Guidance on Consideration of GHG Emissions and Climate Change, which provides recommendations for addressing climate change in Environmental Assessments (EAs) and Environmental

Impact Statements. This guidance recommends that agencies consider the effects of projects on GHG emissions, the effects of climate change on the project area and Proposed Action, and climate adaptation measures included in the project.

Local Economy

We support opportunities to involve the community, increase local economic well-being, and support the local economy as a byproduct of forest restoration. Moving towards desired conditions is vitally important and it cannot be completed without the stability of local and regional forest product economies. Existing mill infrastructure depends on the availability of raw materials from projects like this. This project sends an important message to the existing and potential future local and regional manufacturing facilities, along with the forest health contractors critical to supporting and performing watershed and forest health treatments on the ground. Additionally, in reviewing the economic analysis it shows that the Project could produce as much as $12.2 million in timber receipt that could go to either retained receipts or K-V dollars intended for improving other resources. We ask that any timber receipt from the Midnight Project be put back into the Project area for resource improvement and restoration.

Vegetation Treatments

The Midnight Project proposes several treatments associated with different NWFP land allocations and variable forest types identified in the Midnight landscape evaluation. In the future, we recommend trying to simplify some of the language in prescriptions and their exceptions, as well as making NEPA documents more similar between projects. The NCWFHC supports the proposed ICO (individuals, clumps, and openings) strategy as an effective way to retain large, old, and healthy stands of trees while reducing the risk of stand-replacing wildfire. We support the proposed use of condition-based management on Matrix land and the use of site-specific management in other land allocations such as LSR, Riparian Reserves, Inventoried Roadless Area, and Owl Enhancement Thin.

How are the historical and future ranges of variability, tree densities, and desired conditions used to develop prescriptions?

The NCWFHC understands the landscape evaluation process but 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) identified in the landscape evaluation. Since HRV represents stands with trees that were two to five times the diameter of the trees currently in stands, it is important to design prescriptions that account for the present stand's size class. Until the trees have larger diameters, prescriptions that immediately reduce stand density to HRV could make the largest leave trees vulnerable to windthrow, insects, dramatic shifts in humidity, and fire. We are concerned that prescriptions are trying to achieve HRV at the time of implementation rather than trying to grow trees to meet the size class of trees modeled by HRV.

Please designate leave trees by marking at least two overstory treatment units.

We recommend designating several units as opportunities to mark leave trees and visually demonstrate how the prescriptions will be applied, preferably in units with site-specific management such as those within LSR or Owl Circles. We believe marking could be a good opportunity to involve the interested public and collaborative organizations would be more than willing to help organize. Marking and designating a few representative 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.

Why is there a limit to openings, considering the Forest Service allows for larger opening sizes?

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. Large openings would be suitable in Matrix land and could be applied 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.

How are stands of significant large and old trees identified and retained?
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 at-risk wildlife, including the northern spotted owl and white-headed woodpecker. Given the size of the proposed project, we are wondering how these habitat features will be located and 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.

How does the project identify where to sustain mistletoe for associated wildlife while reducing mistletoe and its rate of spread throughout the landscape?
The NCWFHC supports reducing mistletoe in strategic ways that will lower the risk of disease and wildfire risk to trees while maintaining sufficient mistletoe populations in stands where it is sustainable. In variable densities and forest types, dwarf mistletoe is a important habitat feature for northern spotted owl, western gray squirrel, American goshawk, and dusky grouse. Applying the current Hawksworth rating system proposed in every treatment type, heavy mistletoe infections of individual trees will be removed but mistletoe will remain present throughout all stands. 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 removing all trees with any mistletoe from adjacent stands to decrease the rate of spread. Please identify locations where mistletoe is overrepresented and uncharacteristic as a forest health issue as well as locations where mistletoe does not pose a forest health problem and may be retained for wildlife and forest diversity.

How does the Midnight Project meet the Standards and Guidelines of the Lynx Conservation Assessment and Strategy? Why is the "cold" forest type identified in the landscape evaluation but not included in the proposed treatments?
The NCWFHC commends the work done to remotely identify Canada lynx habitat, especially islands of habitat left amongst the Crescent Mountain and Cedar Creek wildfire burn scars. Given the recent wildfires, lynx habitat is already minimized in the landscape. We support retaining the necessary dense habitat for lynx and snowshoe hare and we recommend retaining acres for travel corridors and forage where it aligns with other retentions of dense habitat such as riparian zones, northern spotted owl habitat, or inaccessible ground at high elevations. Fuel reduction treatments in snowshoe hare and lynx habitat that could result in less than 40% horizontal cover or fewer than 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 and snowshoe hare habitat mosaic when planning site-specific treatments at higher elevations within or adjacent to Lynx Management Zones.

How can Central Washington Initiative funds be used to accomplish non-commercial stand improvements and fuel reductions? The Midnight proposal recommends stand improvement thinning within an Inventoried and Roadless Area. We suggest using CWI funds to complete this work as a stand-alone service contract.

Sincerely,

Chris Branch
Okanogan County
NCWFHC Co-Chair

Tiana Luke
The Wilderness Society
NCWFHC Co-Chair