Data Submitted (UTC 11): 6/9/2023 12:04:22 AM
First name: Janet
Last name: Thompson
Organization:
Title:
Comments: The Methow Valley Ranger District

Dear Midnight Forest Restoration Project Manager,

Thank you for the opportunity to comment on this project. I will keep this brief. I support the use of prescribe burning particularly the thinning of small diameter trees when paired with burning to restore historical forest structure. Thinning should occur during those months where the potential for erosion and soil damage is lowest. It is extremely important for restoration to facilitate retention of soil structure and to minimize damage especially in Riparian areas.
I am opposed to any proposal that increases the cutting of large diameter trees. It is important to restore old growth forests. The direction set out in the Infrastructure Investment and Jobs Act (IIIJA) must remain as guidance for this project and future projects. The eastern slopes of the Cascades have a dry climate, which climate change is exacerbating. The presence of large diameter trees and allowing the growth of large diameter trees will assist in keeping the forest resilient. A necessary component to withstand both fire and drought. Large size trees also play an important role in storing carbon; a much needed asset as we try too address climate change. The definition of a large tree must be consistent with the OWNF Restoration Strategy which defines large trees as over 20" and very large trees as over 25". The definition currently used by the Midnight Restoration plan must be changed as the goal of this project is to build resilience and not revenue. Additionally, dwarf mistletoe should not be used as a rationale for cutting larger trees. Mistletoe in large trees adds value for wildlife habitat and forest structure. The removal of trees with mistletoe must be consistent with the USDA Forest Service Guide for Dwarf Mistletoe. The rating needs to be above 3 for this project.

Post-fire landscapes have very fragile soils and if these soils are to once again become resilient the use of mechanized equipment must be avoided. It is important that any work done to help forest recover be done by hand.

Increasing forest resilience and complexity will help to protect and maintain wildlife habitat. I support the developing and increasing the size and connectivity of the northern spotted owl habitat, reducing the risk of high-severity wildfire in white-headed woodpecker habitat, increasing lynx habitat and maintaining bitterbrush habitat for mule deer winter range. These goals would benefit from specific mapping of the habitat for each species plus an examination of the resiliency of the existing habitat under climate change conditions. It is important to maintain trees along ridgetops to preserve the vital travel corridors. Fire control efforts should not start on the ridgetops but should be prevented by the designs of ground treatments, which prevents fires from reaching the ridgetops.

I support the decommissioning of the 52 miles of roads throughout the project area. This will help reduce the fragmentation of the forest which has occurred. Likewise, I am opposed to the inclusion of 4 new miles of permanent road construction. There should be no new road construction and particularly not the 2.7 miles of ridgetop road in the Little Bridge Creek drainage.
Reducing the fire risk to forest communities is an important part of this project. I would ask the Ranger district to examine how shaded fuel breaks intersect with a larger study about anchor points for fighting fires. Are fuel breaks far away from the Wildland Urban interface necessary to slow a fire?

Again thank for the opportunity to comment on this the Midnight Forest Restoration Project.

Sincerely,
Janet Thompson
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