Data Submitted (UTC 11): 6/9/2023 6:02:31 PM
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Comments: Scoping Comments for Midnight Restoration Project

Thank you for this opportunity to comment on the Midnight Restoration Project. I can see that many hours and financial resources have gone into the creation of the proposal and can appreciate that effort.

However, I must point out that the current proposal is coming from one particular overall perspective. There are other perspectives that must be acknowledged in an analysis. I appreciated the comment of Tracy Miller, who stated that those resources would have been better spent on managing human activity in forests (such as building) ….. that we need to look at the forest with humility, and not the arrogance that we can "recreate what we did not create." To treat the forest as a patient, with ourselves as the physicians, is the epitome of human arrogance in my opinion. The perspective presented by this project is thus contorted due to monocular vision and extreme limitation of public involvement. It's time to back up and take a closer look at this project, preserve the natural sequence of nature-caused fire, and learn to live with fire rather than to attempt once again to stop it, as was done in the past.

1) Scoping: Comments on 4 needs listed in the MRP:

NEED #1: Move current vegetation structure, spatial patterns, and composition toward desired reference conditions. (Note that this sentence is extremely difficult or impossible for the average intelligent reader to understand.)

*"Large patches of dense, young forest have developed due to a lack of forest management, and wildfire suppression."

My comment: If wildfire suppression in the past is largely to blame for mega fires or fires of high intensity, why does this plan not encourage natural wildfires to burn in the affected area, thus reducing the wildfire suppression by humans that has (according to this viewpoint) actually caused or contributed to the problem in the first place? This plan should contain a decision tree that would address which fires would be let burn, under what conditions (time of year, location, under what weather conditions, etc.)

*"There is a need to re-establish frequent fire and adapt to climate change by decreasing fire return intervals and reducing the likelihood of high-severity fires"

My comment: All science does not necessarily support the importance of reducing high-severity fires for forest health. History does not necessarily substantiate that high-severity fires did not regularly exist in the past in healthy forests. Different findings and newly developed perspectives should be considered, not disregarded, and Alternatives should be developed to acknowledge their existence. Recent findings substantiate the theory that fires that create the highest level of biodiversity (and thus forest health) are lightning-caused over diverse ecosystems, creating areas of mixed severity of fire.. As commenter Sarah Lane stated, " Wildfire science, and information on the effects of logging to reduce fire risk is far from settled, and the Forest Service cannot cherry-pick the studies that support logging, they must consider all the science."

For example, consider the April 3, 2023 article, "Countering Omitted Evidence of Variable Historical Forests and Fire Regime in USA Dry Forests: The Low-Severity-Fire Model Rejected," by William L. Baker, Chad T. Hanson, Mark A. Williams, and Dominick A. DellaSala. (Special Issue Fire Regimes and Ecosystem Resilience) https://www.mdpi.com/2571-6255/6/4/146. The abstract states: "The low-severity model is rejected and mixed-

severity model is supported by the corrected body of scientific evidence."

If this Restoration Project is serious about promoting a healthy forest, such findings must be considered among the alternatives of any "restoration " projects. A mosaic of varying levels of fire intensity is desirable for forest health. And as NCCC has commented, "Without a plan to allow fire to resume its natural role, the forest will revert back to its former condition over time."

To quote commenter Sarah Lane once again: "In the age of climate change, it is impossible to predict how historic conditions have been changed, and will further change, so trying to restore these arbitrarily-described conditions via logging is an exercise in futility that will reduce the forest's natural resilience.

NEED #2: "Protect and maintain wildlife habitat and complex forest in strategic places."

My comments:

*Resilient trees: I agree with long-time professional wildlife expert Bob Naney in his comment regarding retention of resilient trees: "Large trees, generally greater than 18" dbh and 150 years old, are the most resilient to fire and should be retained in the forest landscape, excepting for safety along major forest roads." In addition, when these size classes are in clumps, these fire-resilient trees should still be retained, regardless of whether they are fir, pine, or other forest species.

*Soils/mycorrhizae : Science is now exploring the intricacies of mycorrhizal fungi related to old growth forests and the interrelationship of trees and tree species via these fungi. We do seem to know that when mycorrhizae are present, plants are less susceptible to water stress. It is also known that different species of trees relate to and support each other through the networks of mycorrhizae in the soil. These interrelationships do exist in a diverse forest setting. This information should raise the flag of caution in the current trend toward creating large monocultures of Ponderosa Pine forests, which it appears is one unstated goal underlying this "Restoration" project - which appears to minimize the mixed conifer forest, especially in the sections relating to LSR 's. https://www.nytimes.com/interactive/2020/12/02/magazine/tree-communication-mycorrhiza.html

*Shaded Fuel breaks: Once again, I must agree with Mr. Naney in this regard: "Since this is a restoration project to create a more resilient landscape to extreme wildfire, the need for shaded fuelbreaks is greatly reduced. Once treated fire can burn across the landscape to maintain a healthy forest that can withstand fire. Shaded fuel breaks provide little to no habitat for native wildlife species and extend sight distances from roads that reduces the effectiveness of adjacent habitats." In addition I would add that these fuel breaks present an attractive nuisance for damaging off-road vehicle traffic (and accompanying sedimentation) and should be discouraged, especially far from human habitations. Moreover, the example of the Eagle Creek fire along the Columbia River (Oregon/Wa) demonstrates the ineffectiveness of this strategy in the case of wind-driven fire. In that case, the fire jumped even the Columbia River.

* Late Successional Reserves - No logging should be allowed in a Late Successional Reserve. The biodiversity and intricate relationships among trees in such Reserves should be preserved without interference from human beings.

Condition-Based Management and "Designation by Prescription": Selection by loggers as to which trees to cut has no place in this plan. The trees to be removed must be marked by qualified individuals and any prescriptions not changed by loggers. Commercial considerations need to be removed.

NEED #3: "Provide an affordable, safe, and efficient transportation system and reduce sedimentation from roads

on National Forest System land."

My comment:
*Do not add more roads to the area of the Midnight project.
*Do not allow off-road vehicle traffic on forest roads and use available funding for enforcement.
*Do decommission roads that are unneeded, preferably leaving narrow passage to hikers and other non-motorized recreationists.

NEED #4: "Reduce fire risk to communities, reduce hazards along ingress/egress routes and improve firefighting effectiveness within and adjacent to Wildland/Urban Interface.

My comment:
*Identify and work with other governmental bodies to post signs on dead-end or impassable roads to avoid entrapment.
*Identify and work with other governmental bodies to post signage for ingress/egress routes.
*Engage the Town of Twisp in regards to joining the Okanogan County Conservation District and becoming a "Firewise" community, as Winthrop is, due to Twisp's vulnerable position within the WUI and lack of regulations to mitigate wildfire within the community.

THE SCOPE OF THE ANALYSIS MUST INCLUDE AN EIS:
*The Forest Service must prepare a full Environmental Impact Statement, including the cumulative impacts of the Midnight, Twisp Restoration Project, and the Mission Project (including lesson learned.)
* The EIS must include a wide range of Alternatives based upon various perspectives as to the history of fire and promotion of healthy forests
*The entire public must be included in the process, including the local public (local to the Midnight Project.) Meetings must include sufficient notice - at least two weeks (unlike the one day's notice of the most recent meeting here in Twisp.)
*No special access to information or influence should be given to any groups, including the NCW Forest Collaborative.

SUGGESTED ALTERNATIVES

Alternative 1: No Action

Alternative 2: Currently Proposed Plan, which assumes that low-intensity fire and logging are the essential solutions to our climate change dilemma.

Alternative 3: A Forest Health and Human Adaptation Alternative based upon the alternative theory that mixed fire intensities (including high intensity fire) are a natural and essential part of a healthy forest and that there are ways humans can and must adapt to this reality. This would also include protection of Apex predators and the mycorrhizal network as part of a healthy forest ecosystem.

Alternative 4: NCC alternative and/or NCC Alternative combined with Alternative #3 and/or any other reasonable alternative suggestions or combination of suggestions from the public.

Sincerely yours,
Isabelle Spohn