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Organization:

Title:

Comments: In your scoping letter for the Midnight Restoration Project, you asked for input in several specific areas: (1) viable alternatives to the proposed action, (2) important information about the project area, (3) concerning effects of the proposed action, and (4) National Forest System roads. I'm primarily interested in topics 1 and 3, and will be dealing with those in my comment letter.

For topic 1, I feel that understory thinning and prescribed burning strike a much better balance between your identified needs of increased resilience, reduced risk to people, and protection of wildlife habitat than overstory thinning, which currently accounts for 12,120 acres of your project area. If overstory thinning under Midnight is to resemble the cuts I've seen so far under Mission, then wildlife habitat is seriously at risk. Far from preserving and enhancing habitat for the northern spotted owl, all the edge habitat introduced by the Mission cuts promise to bolster one of the major threats to spotted owl recovery, the barred owl. And let's hope the Midnight project's version of protecting lynx habitat doesn't resemble Mission's timber sale contract, the prescription for which called for the removal of all lodgepole pine, Engelmann spruce, and subalpine fir below 24 inches in diameter.

As I understand it, the Okanogan-Wenatchee National Forest has forest restoration funds available through the Bipartisan Infrastructure Law, so there shouldn't be the need for a commercial component to the Midnight project. If overstory thinning absolutely must occur, then it should be completed by a contractor rather than a purchaser, and should utilize a leave-tree-mark process 100% aligned with the NEPA document that is ultimately prepared for Midnight.

For topic 3, I am concerned with the proposed action's effect on forest-dependent wildlife like the northern spotted owl, northern goshawk, marten, and fisher, just to name a few sensitive species. I am concerned about the proposed action's effect on old forests, and personally feel that the only appropriate activity in Late Successional Reserves and Forest Plan Old Growth is prescribed fire. I am concerned about the proposed action's effect on soils and aquatic resources. I am concerned about the proposed action's effect on the human experience, as converting the wild Middle and Upper Twisp River landscape to a highly managed, fragmented woodlot will diminish people's connection to this special place and, possibly, their interest in protecting it.