

Data Submitted (UTC 11): 5/13/2024 5:11:45 PM

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Comments: 1.The proposal allows for the cutting of large trees, departing from the Okanogan-Wenatchee National Forest's (OWNF) own 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".

In our dry climate on the east slope of the Cascades, our trees take a long time to grow! Mature ponderosas are often 100-200 years old. Even a moderately sized tree that's 20" in diameter might be a hundred years old. Maintaining structure and function in the forest requires keeping large resilient trees that can withstand both fire and drought. These large trees also play an important role in storing carbon.

To restore old forests on the Midnight Project, all large trees over 20" in diameter should be kept. The definition of a large tree should be consistent with the OWNF Restoration Strategy which defines large trees as over 20" and very large trees as over 25". The Midnight Restoration Plan currently defines medium trees as 16"-24.9" and large trees as over 25".

2.Treatments on ridgetops that impact lynx habitat

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.

3.Permanent New Roads

There are over four new miles of permanent new road construction being proposed in this Project. 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(right now about half of them are being decommissioned)