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Comments: These comments are submitted as public input to the Draft EA for the Midnight project on the MV Ranger District of the Okanogan Wenatchee National Forest. It's evident that a good deal of work went into the preparation of the Draft EA, both from the document contractors and from MV Ranger District staff - in particular for the Specialist Reports.

The main concern with the Midnight Draft EA is what appears to be a shift from forest stewardship to expanded emphasis on commercial logging. Some specifics are included below.

1/ DBH Limit is too high, and should be changed from "No trees greater than 24.9 dbh to be cut, unless..." (Appendix B, p.B-26, which is said to be based on FRS 2012) to (at least) no trees greater than 21(20.9) dbh to be cut, unless..., which is supported in FRS 2012 Guidelines and in other references.
2/ Protection of old growth has been diminished too far, and the age limit for logging has been expanded too far. The change to logging any trees up to 150 years old from the previous upper limit of 80 years old needs to be lowered. Multiple references include protections of trees in the 100 years old range. Yes, site-specific conditions can vary, and yes, the current NWFP amendment planning is in process and may have effect on some old growth conditions and activities. But, guidelines from FRS 2012 also includes that, "There is strong scientific rationale for retaining old trees even those in close proximity to each other." (p.101)
3/ Trees per Acre are too low and should be changed to even 40, which is supported by condition-based management allowance of 20-40. 20-30 TPA is on the low side of science, and the on-the-ground outcome in Mission Project has shown the problems with lower TPA.
4/ Condition-based management can be seen to be understandable with changing conditions and project timelines, but must be implemented with quality professional attention, oversight, and integrity.
5/ Designation by Prescription has been shown in Mission Project to have significant problems and at this time should be removed, but marking take and leave trees needs to be done in a thoughtful way that isn't an eyesore for years to come when the project is finished.
6/ Monitoring is essential and better monitoring implementation needs to be specified and carried out. Concern: Implementation Monitoring B-36, is only "annual"? How does that compare to the "daily monitoring" that is said to be done by field staff? Inclusion of organized public input in some monitoring would be productive and worthwhile. Perhaps from NCWFHC? Or organizations within the Methow Valley?, Methow Conservancy?, Methow Valley Citizens Council?, or having a Methow Valley community monitoring group organized for Midnight Project, including proponents and opponents of the proposed Project?
7/ There needs to be more specific inclusion of timber and truck, work force transportation, for hours, for speed limits, since this activity would be along FS and County roads with immediately adjacent private property. Previous public comment to pave Buttermilk to SnoPark sounds worth consideration.
8/ WUI protection is of course pertinent but is different in different locations in Midnight Project, example Pine Forest compared to uppermost Twisp River. The "suppression" logging along the Forest Service roadsides in uppermost Twisp River with the 2021 Cedar Creek Fire - even when the Cedar Creek Fire itself was closing down - was very questionable WUI protection.
9/ Shaded fuel breaks have mixed scientific support, for effectiveness, and for tradeoffs with wildlife migration corridors and other problems, and should be used with attention and discretion, and with consideration for even not using that method. In particular, shaded fuel breaks in more remote natural areas and at distance from WUI are out of place.

In general I have supported thin and burn Restoration Forestry for many years, as a scientifically supported and sensible, functional way to deal with our current forest condition - a condition that has seemed to come from those decades of fire suppression, as well as climate change and increase in high intensity wildfire. I have seen

some of the sensibly planned and implemented thin and burn projects on the MVRD in the last 25 years or so that have seemed to have a healthier forest outcome, as well as some locations that limited wildfire spread.

While it's also evident and acknowledged that thin and burn is not always a cure-all, and not a roadblock to extreme wildfire, it does have useful application, and those methods tend to move in the direction of better outcome.

A difference seems to have come from what looks to be a change in MVRD project planning and implementation in more recent years. While larger scale landscape planning can be very sensible, the outcome depends on implementation, monitoring, adaptive management, and further followup. The process seems to have gotten tangled in more recent years, with the Mission Project as an example for problematic outcome as well as for lack of public support and for public opposition - as you know.

I myself was a supporter of Mission Project planning, as were many other public members - even though some public members were opposed. The outcome for Mission Project has distanced me from supporting another project of that kind for Midnight Project, with a short list including: too much logging, too few trees remaining, less trees remaining than had been described, too many larger dbh trees removed, too much ground disturbance from equipment, questionable monitoring, problems with DbyP.

Closure: My comments above are submitted as public input and support a changed preferred alternative, that would be based on the contractor planning, with some included changes from MVRD, but with limitations to the expanded emphasis on commercial logging in the Draft EA. Better to refocus on healthy and sustainable forest outcome rather than timber production, and to use Congressional and Executive funding available through CWI, IRA, and other.

If meaningful changes aren't made to the commercial focus in the current Draft EA, even a thin and burn proponent like myself would consider that leaving the landscape as it is in the more out of the way places in upper Twisp River and letting Nature takes its course could be a better long-term outcome.

Please have respect and give attention to a good outcome for this project proposal. Thank you.

Susan Crampton Twisp