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Comments: Need#1: Move current vegetation structure, spatial patterns, and composition toward desired reference conditions.

What concerns us:

The Midnight proposal continues to allow far too many exceptions for the logging of large trees. By the Methow Valley Ranger District's own evaluations, large trees are deficient in this landscape and are an essential component of maintaining the structure and function of the forest. These trees can withstand fire and drought and play an important role in storing carbon. To restore old forests on the Midnight Project, all large trees over 20.9" in diameter should be kept. Ask that the Forest Service drop all exceptions for cutting large trees especially in the Late-Successional Reserves. Only true safety hazards trees should be cut and they should be documented and reported.
An example of one of the most frequently used exceptions is that trees 20.9" to 24.9" can be cut if they have dwarf mistletoe greater or equal to 2 and are within 50 ft. of a healthy tree greater or equal than 18 inches. Dwarf mistletoe is often used as a rationale for cutting larger trees. However, large trees with mistletoe have additional values, including adding valuable wildlife habitat and forest structure. Trees with mistletoe should not be removed from Late Successional Reserves unless they are a stand wide problem. They provide important structure and complexity and shouldn't be used as an exception.
You can find more exceptions in the Environmental Assessment Appendix A (A-4)
Logging should be minimized on steep slopes because it conflicts with restoration objectives.
The Ranger District outlines in its decision criteria for thinning that to make logging on steep slopes economically viable requires twice as many trees to be cut than units that are flat to moderate in slope. This economic incentive conflicts with restoration objectives. Significant soil disturbance from tracked equipment and deep rutting left behind from cable logging can be seen on the moderate to steep slopes logged on the Mission project. Cable logging impacts large and old trees that are often girdled for use as operational anchors. Commercial logging on steep slopes should not be dependent on economic viability but should be carried out in a way that meets restoration objectives (even if it comes at an economic loss; steep units can be funded by infrastructure funds).
Where condition-based management is used in this project, trees over 20.9" under the exception should be marked before harvest and total leave tree requirements should be met.
Although we appreciate leaving condition-based management out of the Late Successional Reserve, where it is being considered in Matrix thin prescriptions we would like to see any exceptions (trees over 20.9") marked and recorded. Where condition-based management is being applied in the matrix, we would like to see the total leave tree target of 70-105 trees per acre in various size classes achieved. In matrix units on the Mission Restoration Project we have seen areas logged where no understory is kept which delays the development of a complex multi-story forest.
Firewood gathering should not be allowed in the Late Successional Reserves remaining consistent with the Northwest Forest Plan's current policy
Although the Environmental Assessment cuts the number of acres available for firewood gathering by 50%, 385 acres are still left open for firewood cutting in the Late Successional Reserve. Land clearing associated with commercial logging improves access to large snags in these areas that were previously inaccessible to woodcutters. As we have seen in logged units on Mission, newly accessible snags are felled for firewood. There are plenty of other places to cut firewood on the forest and these valuable large snags should be protected.
What we Support:

The return of fire to the landscape

Prescribed fire rejuvenates the forest and reduces the likelihood of high severity fire. Because it is labor intensive, challenging to implement and non-commercial, often prescribed fire is left out of the implementation of restoration projects. Numerous scientific studies show that to improve forest resiliency to fire, thinning should be followed by burning. It is a crucial part of the restoration of dry forests and should be prioritized in this Project!
The thinning of smaller diameter trees
In many places, the noncommercial thinning of smaller trees opens up the forest canopy, creates a healthy understory plant community and, when paired with fire, makes the forest more resilient and adapted to fire.
Thinning during winter months
We applaud and support the Forest Service's proposal to treat Riparian Reserves during winter months to minimize soil disturbance and erosion. We believe this is an important approach for preserving soil quality that should be considered across more of the landscape.
Need #2 - Protect and maintain wildlife habitat and complex forest in strategic places.

What concerns us:

Treatments that impact lynx habitat
Lynx habitat is limited in the project area but where it is present it should be a priority to keep. This habitat should be treated in a way that retains plenty of trees to maintain dense cover lynx prefer. The threat of catastrophic wildfire should be more carefully evaluated and not be used broadly to justify degrading habitat. If wildfire is serious risk in certain stands, then then treating surface and ladder fuels and thinning of smaller diameter trees should be prioritized not overstory removal.
Treatments that impact spotted owl habitat
Spotted owl habitat is also limited in the project area and should be a priority to keep as complex multi-story forest. As with lynx habitat the threat of wildfire should be more carefully evaluated and not be used broadly to justify degrading habitat.
What we support:

Protecting the limited northern spotted owl habitat
Designating key lynx habitat and maintaining remaining bitterbrush habitat for mule deer winter range
All of actions described in Need #2 of the Restoration Plan could benefit from specific mapping of the habitat for each species. It would also be helpful to detail the resiliency of the existing habitat under a changing climate.
Need #3 - Provide an affordable, safe, and efficient transportation system and reduce sedimentation from roads on the National Forest System

Over 172 miles of open, closed or unauthorized road exist within the Midnight Project area. Some of the closed roads will be opened for commercial thinning operations on this project. Of the roads that are opened, some will be decommissioned, while others will be left open mostly for administrative use.

What Concerns Us:

All currently closed roads should be decommissioned post-project.
Currently only 17 of 34 miles of the closed roads are being decommissioned after the project.
There should be dedicated funding to remove temporary roads after the project
What we Support:

The decommissioning of 52 miles of road throughout the project area.
Decommissioned roads can help to reduce fragmentation of the forest, sedimentation of creeks and rivers, and illegal, unauthorized use of the road network.
We appreciate that the district has removed the building of any new permanent roads.
Need #4 - Reduce fire risk to communities, reduce hazards along ingress/egress routes and improve firefighting effectiveness within and adjacent to Wildland/Urban Interface.

What concerns us:

The threat of severe, catastrophic wildfire is often used to justify the need for treatment on this project instead of focusing on restoring fire resiliency across the forest landscape
Many proposed commercial treatments on this project are justified based on simulations representing the most severe wildfire weather forecasts. Wildfires burn at different severities depending on many different conditions. Rather than trying to prevent the unknown impacts from a hypothetical wildfire the focus should be on establishing fire resiliency throughout the forest.
Putting in machine firelines instead of hand firelines for prescribed burning especially along ridgetops.
Up to 18.7 miles of machine fireline is proposed for the project. These are often created by bulldozers, create a significant disturbance and can become unauthorized trails when they are used by WATVs.
The adding of new shaded fuel breaks. Shaded fuel breaks can be linear, unnatural breaks in the forest that fragment habitat
Where shaded fuel breaks intersect with a treatment unit, the prescription of the unit should prevail -especially in areas of complex old forest stands. As detailed above, treatments across a full landscape are more effective than isolated, linear treatments
We would encourage you to question the Ranger District about 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 (WUI) necessary to slow a fire?
We support the maintenance of existing shaded fuel breaks as fuel breaks when not maintained, can fill in with dense understory fuels and become more of a fire threat
Much like thinning should be followed by burning, shaded fuel breaks also need to be maintained with fire overtime to be effective.
What we support:

Properly thinning and burning the landscape as a whole will help this landscape be more resilient to fire and far less likely to carry wildfire quickly at high severities
As extensive scientific research indicates thinning small diameter trees followed by regular prescribed burning is one of the most effective ways to control fire on the landscape. When fires do burn through these areas, they burn at low and moderate intensities that stay out of the canopy and maintain the ecological function of the forest. With properly implemented thinning and burning, linear, unnatural shaded fuel breaks (areas along roads that are thinned more intensively) become unnecessary as there are numerous anchor and control points in the forest itself from which to fight fire.