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First name: Paige
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Title:
Comments: Greetings,

There are a number of comments I would like to make. There are parts of the proposed Midnight Restoration Project that I take issue with, some parts that I applaud and want to make sure remain, and some issues of concern that I want to make sure are addressed by the Project. For this project the Methow Valley Ranger District has outlined four main needs for the project that the proposed actions (thinning, burning, and road maintenance) are intended to address, and as such I will formulate my comments to fit in with the proposed needs.

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

The proposed actions relating to Need #1 of the Midnight Restoration Project Proposal that I take issue with are as follows:

-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. All exceptions must be dropped 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. Only true safety hazards trees should be cut and they should be documented and reported.

-Logging should be minimized on steep slopes because it conflicts with restoration objectives.

-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.

-Firewood gathering should not be allowed in the Late Successional Reserves remaining consistent with the Northwest Forest Plan's current policy.

The parts of the Project I want to remain are as follows:

-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. I applaud and support the Forest Service's proposal to treat Riparian Reserves during winter months to minimize soil disturbance and erosion. I 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.

-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. I support designating key lynx habitat and maintaining remaining bitterbrush habitat for mule deer winter range

-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. I support protecting the limited northern spotted owl habitat.

-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

-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.

-I 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.

-I 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.

There are several concerning issues within Need#4 and I have listed them as follows:

-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.
Are fuel breaks far away from the Wildland Urban Interface (WUI) necessary to slow a fire?

-I 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.

-I 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.

Thank you for reading and considering these comments. I have hope that with the right kind of management and considerations, the human and much larger non human community effected by the actions mentioned in this proposal will benefit from the work that will be done in the Midnight Restoration Project.