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Cynthia Sandeno, Acting Forest Supervisor
c/o Meg Trebon, Methow Valley Ranger District
24 W. Chewuch Rd.
Winthrop, WA 98862

Submitted electronically at https://cara.fs2c.usda.gov/Public//CommentInput?Project=63933

Dear Ms. Sandeno:

The Wilderness Society (TWS) is pleased to comment on the draft environmental assessment (EA) for the Midnight Restoration Project. As a member of the North Central Washington Forest Health Collaborative (NCWFHC), TWS has been very involved in the development of this project since its inception. TWS supports the comments submitted by the NCWFHC.

We appreciate the handy 3-page document on the project webpage, Midnight Restoration Project, Changes to Project, April 2024, which summarizes changes in the project to date. TWS is especially glad to see the following change: "Of the 4.2 miles of new road construction proposed at scoping, all but 0.1 mile at Gilbert Trailhead has been dropped from the Proposed Action." In our scoping comments on the Proposed Action, TWS raised concerns about the proposed road construction in light of the Collaborative Forest Landscape Restoration Act's constraint on establishing new permanent roads (see 16 USC 7303(b)(1)(F)(i) and 7303(g)(2)(A)). We appreciate that the district staff looked into the matter and decided to "eliminate these roads to be consistent with the CFLRA."

TWS is also glad that "3 miles of unauthorized roads proposed for addition to the National Forest System road inventory for the purpose of supporting restoration treatments have been modified to 'decommission' post project." In our scoping comments, TWS questioned whether adding existing unauthorized roads to the National Forest System Roads layer within the Sawtooth Inventoried Roadless Area would be allowed by the Roadless Area Conservation Rule. Please note that there is an apparent error in Table 1 of the Changes to Project document: In the row titled "All roads decommissioned," which indicates that the decommissioning mileage has increased from 52.3 miles to 55.4 miles, the increase in mileage should be changed from "+2.1" to "+3.1".

TWS supports the Midnight Restoration Project's proposed actions affecting portions of the 122,197-acre Sawtooth Inventoried Roadless Area, as discussed on p. 49-51 of the draft EA. In particular, the Midnight proposed action calls for site-specific thinning of trees up to 10 inches in diameter and prescribed burning on 3,697 acres of the IRA for the purpose of reducing risk of uncharacteristic wildfire and restoring natural structure to overly dense stands. We concur that this activity is consistent with the Roadless Area Conservation Rule's allowance for cutting of generally small-diameter trees for ecological restoration and wildfire risk reduction. TWS also supports the proposed decommissioning of 2.8 miles of existing roads in the IRA, which will reduce total road mileage in the IRA by 49 percent.

Finally, we are glad to see that the Midnight Restoration Project will include a significant amount of huckleberry enhancement treatments. According to the EA (p. 26), "thinning and prescribed fire treatments in approximately 1,000 acres of huckleberry patches would create a long-term, moderate benefit to huckleberry patch size and vigor, and berry production due to thinning treatments and prescribed fire, which would control the competition of

water, nutrients, and sunlight from encroaching conifers." TWS supports huckleberry restoration work done in cooperation with affected tribes to improve habitat for this culturally important First Food.

Sincerely,

Michael Anderson, Senior Policy Analyst
The Wilderness Society