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Comments: Thank you for this opportunity to comment on the Methow Ranger District Midnight Project.

I have lived in Twisp for the past 9 years. During that time I've explored much of the Twisp River watershed and the Midnight Project area. I think of the Twisp as my 'home watershed'.

I worked one field season for the Methow Ranger District helping to set up an interdisciplinary post-fire (Carlton Burn) study. Before that, I worked for about thirteen years as a field tech for the Payette National Forest in Idaho, helping lay out and monitor watershed rehabitation projects and doing a variety of watershed and fisheries surveys. I had extensive on-the-ground involvement in post-fire BAER surveys, as well as timber salvage sale layout and monitoring. During those years I learned quite a lot about the effects of historic fire suppression and timber harvest, and was able to observe and document in detail on-the-ground conditions both before and after large-scale wildfire.

Based on what I learned during those years and what I've observed in the Methow over the past decade, I applaud the Forest Service for the intent and much of the design of the Midnight Project. The active restoration of a more fire-resilent landscape is exactly what is needed and has been needed for many years. Achieving this through thinning, prescribed burns, and judicious, limited commercial harvest, is, I think, the right way to go. Additional benefits to the watershed will be accrued through the reduction of road density, which I also applaud.

But there are also aspects of the project design that I'n not so sure about.

1. I would like to see more safeguards and emphasis on preserving the large diameter trees that are a critical component of the fire resilent landscape we hope to restore. More large trees, fewer small trees - in a nutshell, that's the end result the project is driving towards. The presence of mistletoe is used as a justification for harvesting of trees greater that 21" dbh. But mistletoe is tricky. How out of balance is the mistletoe in these forests, really? How bad is resulting tree mortality likely to be? How many snags are too many? The mistletoe excuse to cut is often problematic and with a lack of transparency certainly leads to questions of trust. If larger trees are to be cut they should be previously marked by forestry crews and not subject to the subjective choices and commercial motivations inherent in condition-based management.

2. Logging on steep slopes should also be driven by restoration rather than commercial harvesting goals and funded by restoration dollars. Cutting twice as many trees on steep slopes and use of machinery that is hard on the ground and the standing trees does not seem consistent with restoration goals.

3. I wonder about plans for bulldozer fire lines. These are always supposed to be obliterated and rehabilitated but in fact there are obvious bulldozer scars all over the Forest, plenty of them from recent fire suppression activity. It would be a shame to see more of this long-term disturbance in a project intended to restore the forest landscape to a more natural appearance and condition.

4. I also have questions about the whole concept of 'shaded fuel breaks'. How likely are these to be effective in actual wildfire scenarios, especially if they haven't been maintained? And how likely are they to be maintained over the long periods of time necessary to make them meaningful?

Again, I do support the general intent and design of this project as I understand it. Thank you for considering my comments.

Nick Hershenow