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Comments: Hello! I am a regular visitor to the Methow Valley and have concerns about this project.
- The Midnight proposal continues to allow far too many exceptions for the logging of large trees and logging on steep slopes.
- Where condition-based management is used in this project, I'd like to see language added for trees over 20.9" under the exception to be marked before they're harvest. I'd also like to see language that specifies the total leave tree target of 70-105 trees per acre in various size classes achieved to preserve understory in those areas.
- Prescribed burning after thinning should be added and the noncommercial thinning of smaller trees. Both of these done in the winter months.
- Preserve Lynx habitat: 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.
- Preserve 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.
- Restore fire resiliency: 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. Also I support using hand firelines vs. machine firelines.
- Fuel breaks: When new fuel breaks need to be added, I'd like to see the study consider the larger unit and try to maintain existing shaded fuel breaks where possible.
Thank you for your time,
Annie