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Comments: Thank you for the opportunity to comment on the Midnight Restoration Project #63933.

While not experts on every aspect of forest management, my wife and I do have direct experience of living close to the boundary of the proposed Midnight Restoration Project for over 12 years. During that time, we spent many hundreds of hours hiking and meandering along trails, ridge tops and riverbanks, becoming especially familiar with the upper reaches of the Twisp River and surrounding Lake Chelan-Sawtooth Wilderness Area. We were also evacuated twice due to approaching wildfires and know first hand the before and after that can result.

From what we gather from the proposal, the Midnight Project allows far too many exceptions for the logging of large trees-trees that can withstand fire and drought and play an important role in storing carbon. These larger tress are an essential component of maintaining the structure and function of the forest under your management. To restore old forests on the Midnight Project, all large trees over 20.9" in diameter should be kept. The Forest Service should drop all exceptions for cutting large trees especially in the Late-Successional Reserves and only safety hazards trees should be cut, documented and reported.

Because it actually conflicts with restoration objectives, logging should be minimized on steep slopes. Significant soil disturbance from tracked equipment and deep rutting left behind from cable logging can be already be seen on moderate to steep slopes logged on the Mission project. Additionally, firewood gathering should not be allowed in the Late Successional Reserves and remain consistent with the Northwest Forest Plan's current policy.

We've learned a lot in the past 10 years. We've learned that prescribed fire actually rejuvenates the forest and reduces the likelihood of high severity fire. Often prescribed fire is left out of the implementation of restoration projects-even though numerous scientific studies show that to improve forest resiliency to fire, thinning should be followed by burning. Prescribed fires are a crucial part of the restoration of dry forests and should be prioritized in this Project. We've also learned that noncommercial thinning of smaller trees opens up the forest canopy, creating a healthy understory plant community and-when paired with fire-can make our forests more resilient and adapted to fire.

The threat of wildfire should not endanger critical habitat . Endangered species such as the northern spotted owl, lynx and other species need to be considered. The threat of wildfire should be more carefully evaluated and not be used broadly to justify degrading habitat.

Nothing degrades landscapes more readily than roads. All currently closed roads should be decommissioned post-project. Decommissioning roads helps to reduce fragmentation of the forest, reduce sedimentation of creeks and rivers, and reduce illegal, unauthorized use of the road network.
In a similar vein, machine firelines created by bulldozers, create a significant disturbance and often become unauthorized trails when they are used by WATVs. They should be limited, especially along ridge tops.

In summary, in our opinion thinning small diameter trees followed by regular prescribed burning is the most effective way 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 such as along roads become unnecessary. We've seen it up close and personal.

Thank you in advance for reading and considering these comments.

Jim Brennan
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