Data Submitted (UTC 11): 5/17/2024 2:17:01 AM
First name: Marc
Last name: Daudon
Organization:
Title:
Comments: Thank you for the opportunity to comment on the Midnight Restoration Project and on your efforts to put forth a project plan intended to sustain the health and vitality of the forest, ecosystem, and community for the long term.

As residents of the upper Twisp at the junction with Buttermilk, our family will be directly - and negatively - impacted by the trucks, the logging, the snowplowing, the construction of temporary roads, and other activities associated with the project. Conversely, we will benefit from having a healthier forest that is more resilient to the effects of climate change and from reduced wildfire danger and associated smoke.

I support many aspects of this project and believe we need to move forward expeditiously with implementation. However, I feel strongly that certain elements of the project are deficient and need to be improved before moving forward:

- The conditions-based management needs to be adaptive to the actual conditions on the ground at the time of cutting - not at the time of sale. If there is a fire, or drought, or other material change in the forest between the time of contracting and when the logging takes place, the plan and terms of the contract must be adjusted accordingly. Otherwise, it is not truly conditions-based management, and the benefits of this approach are negated.

- Logging of larger diameter trees should be minimized, the rare exception, and all should be marked before cutting. This will allow for proper oversight and better accountability regarding the actions of the logger to the Forest Service and the public. While this may cost a little more, the benefits in terms of transparency and building public trust far outweigh those costs.

- Similarly, steep slope logging should be minimized. If the goal is truly "restoration", it is incompatible with that goal to allow twice as many trees to be cut in order for this component of the project to be commercially viable. And the damage to the soils and plant life will be significant. This aspect of the plan should be revised to truly deliver restoration benefits.

- The impact of road traffic on the condition of the road and the folks who live along the road will be significant and need to be better addressed in the plan. What solutions are possible so that all roads and not plowed throughout the entire winter to enable some recreation? The statement that roads where 'log hauling and other project traffic will occur will be improved and maintained' is far too vague. As is the statement that on average 14 round trips a day will occur on the roads - what is the maximum # of trips? for how many days in the year? What funding is allocated for road maintenance and resurfacing? What plans have been made with Okanogan public works for this maintenance? All these issues should be addressed in the revised project plan.

Finally, the fact that the US Fish and Wildlife Department is objecting to aspects of the project is very concerning. We citizens count on our agencies to coordinate and cooperate to ensure that the best possible solutions are put forward, especially when there are conflicting objectives. The revised plan should address concerns that they have raised in their letter.

In closing, I thank you again for your efforts to tackle the challenge of restoring the health and vitality of Twisp River forests. We do need this project and there are many best practices and elements included, such as prescribed burns and special treatment of old growth/spotted owl habitats. I urge you to move quickly to address the deficiencies so that the vast majority of the community is supportive, and then proceed with implementation.

Marc Daudon