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Title:

Comments: In reading over the Methow Valley Citizen's Council's comments concerning the Midnight Restoration Project up the Twisp River drainage, I applaud the organization for it's thoughtful, exhaustively researched and well presented recommendations to your team of land managers. I would add my own thoughts to those recommendations:

I have felt from the very beginning that the threat of wildfire has been used so heavily in your prescriptions for treatment that restoring forest resiliency has taken a back seat. In previous comments I have pointed out how the Mission project, in way too many areas, has looked like a well-executed commercial thin to create a fire break, where "forest restoration" was the real goal.

Based on this critique, I believe your prescription for this project leaves way too many exceptions for the logging of large trees, in light of your own desire to leave as many large trees as possible. I urge your team to drop all exceptions for the cutting of large trees- and to keep all trees over 21" in diameter, especially in the Late Successional Reserve areas {{hazard trees of large diameter would be an exception}}.

I am going to question your team on the need for new shaded fuel breaks so far up the Twisp River. On the third field trip last Fall, our first stop along the Twisp River Road, we discussed the shaded fuel break proposed for that stretch. With the road and the river as two significant fire breaks already there, what more can you ask for? If a fire is so intense it will jump a road AND a river, what good will a shaded fuel break do, really? Are you so afraid of fire you'll reduce one of the finest scenic corridors on the entire forest to a shadow of its former grandeur? If a wind driven fire can jump the finest fire line in all the Northwest {{the Columbia River}} then wouldn't it also jump a shaded fuel break? PLEASE reconsider your use of shaded fuel breaks on this project. There may be areas that a shaded fuel break would be appropriate, but this project is not one of them. And it should be pointed out just how distant these fire breaks are from the Wildland/Urban Interface.

As pointed out in the MVCC's comments, the maintenance of existing shaded fuel breaks is critical for keeping them effective, and money's should be set aside for this purpose, and it should be so stated in your plans.

Logging on Steep slopes: I can't say this with enough emphasis- the funds you are using for these projects has been ear marked for "Forest Restoration"- to attempt to make the logging of steeper slopes "economically viable" goes against everything in your mandate for "restoration". These are sensitive areas, and your mandate does

I support the decommissioning of 52 miles of road, and support your intention to forego the building of any new permanent roads. However, all currently closed roads should be decommissioned after the project- currently only half of the 34 miles of closed roads are going to be decommissioned.

not require you to insure economic viability at every turn. I would encourage your team to really examine the steeper slopes slated for logging and think more in terms of what these slopes should look like as it relates to

The things I like about your plan:
The removal of any proposal to build a new, permanent road
Decommissioning of 52 miles of road
Use of prescribed fire
Thinning of small diameter trees
Thinning in winter {{winter job creation}}

"forest restoration" after the treatment is completed.

One last and important piece of input:

at the last of the three field trips, down by the river at the second stop that day, I suggested that in the most sensitive areas {{by the river and elsewhere}} you should capitalize on the extensive expertise your ID Team possesses, and go to the old "leave tree marking" system. It is a proven and time tested system that absolutely

should not be completely abandoned, especially in these sensitive areas. If economics is your team's reason for abandoning such a proven system, then your team needs to rethink this. I hope this piece of input spurs a conversation among your team.

Again, your mandate for using this significant amount of funding does not require you to think first about the economics of forest restoration- rather, it is intended to fund a truly interdisciplinary approach to true forest restoration. While economics enters into your work, and you have to consider it to some undefined degree, it should take a back seat to true "forest restoration' in its best form. I would trust your experts to utilize their expertise in a leave tree marking scenario in these sensitive areas, far more than I would trust any contractor to select the trees to be taken. After I made this suggestion that day, Eireann Pederson, Silviculturist, said to the group that this would be considered as an option. Unless I missed something in your plan, it looks as if "leave tree marking" in sensitive areas was not seriously considered, which is a huge disappointment to me. I think your team missed a great opportunity to take thoughtful public input to heart. Not sure where this leaves me as an interested citizen trying to have my voice heard. In summary, leave tree marking by your team in sensitive areas should be part of this restoration project.