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Comments: Thank you for the opportunity to comment on the Midnight Restoration Project. As with the other recent restoration projects proposed/implemented on the Methow Valley Ranger District, there are several aspects of the project I wholeheartedly support. I applaud the use of prescribed fire, understory thinning to remove ladder fuels and trees < 10" DBH, and road decommissioning to decrease erosion, sedimentation, and habitat fragmentation.

Also similar to your other recent/current projects, I have several main concerns, all centered around the proposed overstory thinning treatments. Most critically, I am unclear why the timber sale model is being utilized for this project, given the funding made available through the Bipartisan Infrastructure Law. If we didn't have to commodify our trees, the focus of the treatments could remain squarely in the project's stated needs -- in particular, Needs #1, 2, and 4. I have no doubt that the overstory thinning carried out under the Mission Project would have looked very different if completed by a contractor working for the USFS, rather than a contractor working for the purchaser, in an environment where everyone was trying to maximize their profits.

Given that the District will likely proceed with the timber sale model, however, there are a few other concerns I wish to highlight. First, the exceptions to the 21" DBH diameter cap in effect just makes for a blanket 25" DBH diameter cap. The dwarf mistletoe rating criteria look reasonable on paper, but in the field that is presumably quite subjective and would be particularly squishy to a contractor working for the purchaser of the trees. Again thinking of the Mission Project, diameters may be underestimated on the ground and sticking with a clear, no-exceptions lower diameter limit will hopefully at least keep the actual limit within a couple inches of that.

Second, I am concerned about planned logging on steep slopes. The EA contemplates harvest operations on slopes of 45-80% using cable, tether, or helicopter logging. Again, the Mission Project provides an example of what not to do. Significant soil disturbance from tracked equipment and deep rutting from cable logging can be seen on the moderate to steep slopes in some of those cutting units. Cable logging also damaged large/old trees in that timber sale.

Third, I do not support the creation of new shaded fuelbreaks within 200 feet of roads and ridges. This creates extensive new "edge" habitat and contributes to habitat fragmentation, without clear gains in protecting the WUI (unless located literally at the WUI's edge). Roads already affect the permeability of the landscape for many wildlife species, even without an extra 200 feet of cleared forest on either side. And establishing new fuelbreaks along ridges where no roads currently exist introduces unnecessary new disturbance to otherwise natural areas, invariably (and irreversibly) introducing noxious weeds and soil erosion, and diminishing wildlife habitat value, all for theoretical catastrophic fires that may or may not ever encounter that ridge, and may or may not be stopped by the fuelbreak.

These are just a few of my concerns. I hope you will give *real* consideration to comments received from science- and conservation-minded individuals and groups during the NEPA process, and respond not just by further building your case for the Proposed Action, but by exploring ways of meeting project objectives that have fewer ecological tradeoffs.

Thank you for your time and attention.