DATE: November 24, 2025

TO: Okanogan/Wenatchee National Forest Service

FROM: Kathleen Hirschstein,
68 Dancing Bear Road, Carlton, WA 98814
pinkkathleenann@gmail.com

RE: OBJECTIONS to Midnight Restoration Project #63933

SEND: Objection Comment Letters to:

https://cara.fs2c.usda.gov/Public/CommentInput?project=63933

As a member of the North Cascades Conservation Council, the Methow Forest Forum, and the Methow Valley Citizens' Council, and as a retired public school teacher, and a 49-year resident of the Methow Valley in Okanogan County, Washington State, I am writing in support of the North Cascades Conservation Council's **Objection to the Midnight Restoration Project # 63933** as it is proposed by the Okanogan/Wenatchee National Forest Service.

REASONS for Objections to the Midnight "Restoration" Project

Under the guise of wildfire suppression, misinformed members of Congress and profit-motivated commercial timber corporations have pressured Federal government policy makers to illegally allow logging on one hundred eighty-five thousand (185,000) acres of forest land in the Methow Valley. Divided into four different treatment areas, it will take over 30 years to complete this flawed logging operation, and will require building 87 miles of new roads in order to cut down hundreds of thousands of trees from our public forests.

Other alternatives must be seriously developed by the USFS and fully considered in an Environmental Impact Statement including all of the contiguous projects in the Methow Valley Watershed.

Of the 185,000 acres destined to be logged, the Midnight "Restoration" Project will treat 56,000 acres of forest trees within the Twisp River Corridor mostly by removing trees up to 25 inches and more.

The Midnight "Restoration" Project is seriously flawed for many reasons, especially because it violates the standards of the 1994 Northwest Forest Plan that protects wildlife species under the Endangered Species Act. (Matt Danielson, Conservation Northwest comment letter 5-2024.) In addition, it allows violations through making changes to Standards and Guidelines, and the unnecessary use of hazard exceptions.

The Midnight Project is deceptively promoted as a thinning treatment rather than a logging operation; however, chainsaws and heavy logging equipment are used for both thinning and logging which negatively disrupt and destroy the forest landscape and ecosystem.

Despite the convoluted action descriptions and the misleading indicator tables in the Midnight EA, commercial logging is planned in the Late Successional Reserves, also violating the Northwest Forest Plan.

The Midnight Project is seriously flawed because it ignores 30 years of scientific studies completed by Forest Service scientists that prove that logging and thinning our forests does not protect our forests or our communities from wildfires.

Logging and thinning does not reduce the risk of wildfires, but rather may increase the risk of wildfires. (DellaSala and Hanson,eds., *The Ecological Importance of Mixed-Severity Fires: Nature's Phoenix,* Waltham, MA: Elsevier, 2015)

Several studies indicate that as forest density goes up, fire severity may go down. (Zald & Dunn: 2018)

Forest Service scientists, (Lesmeister et al, 2019) found the denser, older forests with high canopy coverage had lower fire severity, and they "buffer the negative effects of climate change" regarding wildfires.

The Forest Service's own scientists concluded: "Thinned forests have more open conditions which are associated with higher temperatures, lower relative humidity, higher wind speeds, and increased fire intensity. Further, live and dead fuels in young forests, and thick stands with dense saplings or shrub understory will be drier, making ignition and high heat more likely, and the rate of speed higher because of the lack of wind breaks provided by closed canopies with large trees."

A massive 30-year regional analysis of several hundred wildfires conducted by Forest Service scientists (Lesmeister et al, 2021) found that the more open forests with lower biomass had higher fire severity because they have "hotter, drier, and windier microclimates, and that those conditions decrease dramatically over relatively short distances into the interior of older forests with multi-layered canopies and higher tree density."

In 2021, Forest Service scientists found that dense forests have more measurable moisture, so that very dense forests tend to burn at lower, not higher intensities.

Although the Midnight "Restoration" Project is advertised as a restoration thinning project for fuels reduction to protect homes and to save lives, it is actually a logging operation with numerous negative impacts.

Mechanical thinning changes the microclimate of the forest in ways that often increase fire intensity and speed. Mechanical thinning also kills significantly more trees than it prevents from being killed. To be clear,

mechanical thinning is another word for logging. In many circumstances, there is no need to thin forests before prescribed burning.

The Midnight “Restoration” Project claims to be a “restoration” project; however it will NEVER restore the 56,000 acres of forest that it intends to heavily log within the Twisp River Corridor.

Logging rarely restores the lands it destroys.

The Draft Environmental Assessment (EA) states that the Midnight Restoration Project will have “No Significant Impact” on the Twisp River Ecosystem or local residents.

That is not true. There will be permanent and negative “Significant Impacts” to our forests and our communities including:

1) Destruction of the tree canopy which shades and cools ground water in the soils and reduces ground fuels. The loss of the canopy increases the drying of the soil and warming of ground water which increases hotter and faster burning wildfires.

2) Removing the larger shade trees causes loss of overstory canopy and soil surface disturbance, increasing water temperatures in riparian areas and negatively affecting fish and riparian species.

4) Removing the larger trees increases open spaces that increase fire velocity which makes the forest burn faster and hotter whereas leaving trees in the forest slows wind velocity, acting like a buffer.

5) Logging trucks cause significant impacts !!! For more than ten years, The Midnight Project will include 40,000 trips by heavy logging trucks careening down narrow, mountainous roads seriously endangering the lives of local residents, hikers, recreationists on

bicycles, horse-back riders and wildlife along the Twisp River Road, the town of Twisp, and Highway 20.

6) 40,000 logging truck trips will degrade our local roads and highways. The logging companies are not required to annually repair the damage they will cause to our local streets, roads, and highways. Okanogan County tax-payers will bear the burden of expensive road repairs while the logging companies collect the profits from logging our public forests.

7) Logging trucks cause major air pollution, noise pollution, and dangerous traffic conditions.

8) Logging and logging trucks cause significant impacts !!!

SOLVING the PROBLEM

Forest Service research indicates logging in the forests is not beneficial or restorative because it does not protect communities from forest fires (Calkin et al, 2023). **Without the disruptive and negative effects of logging,** the existing forest plans of the 1994 Northwest Forest Plan maintain the restorative intent for healthier forest management, especially in Long Term Successional Reserves and Riparian Reserves.

In order to protect our communities from wildfires, the Forest Service research clearly supports the recommendations from professional fire fighters, hotshot fire crews, Fire Districts throughout the country, smokejumpers, and firewise experts: **Home owners need to prepare a defensible space within 30 - 50 feet around their homes.** (100 feet would be even better, but not required)

Creating defensible space around houses is safer and more cost effective for community fire protection than the costs and impacts associated with commercial logging and resulting wildfires.

Logging for fuels reduction on federal land to protect houses and to save lives **should be limited to areas within one half (½) mile from private property.** Fuel reduction logging miles away from private property does not help protect houses. Fortunately, money saved from subsidizing hundreds of thousands of acres of timber logging projects, the Forest Service can provide funding to help citizens successfully create defensible space around their houses to protect from wildfires, and learn how to prepare and implement a community evacuation plan to save lives. (Calkin et al, 2023)

A fire-wise defensible space can be accomplished by residents:

1) Use fire-resistent vegetation to replace the highly flammable shrubs, trees, and grasses within the 30-50 feet defensible space around a house.
2) Leave the dirt exposed, or cover the defensible space with either; gravel, concrete, tiles or stones.
3) Rake and remove all the dead leaves and branches from the 30-50 foot defensible space.
4) Remove all dead leaves from roof gutters.
5) Use metal roofing, and other fire-proof materials to repair or build structures.
6) Reduce ground fuels by limbing lower branches from trees, lopping, prescribed burning, and other means of ecologically-friendly fuels reduction.

7) Use non-flamable materials to cover all vents: vents in roofs, under eaves, and under decks to prevent embers from penetrating openings. Hot embers that are blown into vents are a major reason for houses to burn down during forest fires.

8) Live tree removal should be concentrated on nearby dense, fire-prone stands within **one-half mile from houses**; however, larger **trees over ten (10) inches in diameter are fire-resistent and should NOT be cut down !!!**

The Midnight project wrongly allows commercial loggers to cut down trees that are up to 25 inches diameter and larger. Since there is little Forest Service oversight to monitor which trees are removed during the logging operation, many large trees will be taken, thereby reducing forest fire resiliency.

8) Fuels reduction work should be non-commercial projects where the contractors have no incentive to remove large trees.

9) No new roads should be constructed on national forest land since 84% of forest fires are human caused, especially along roads.

10) The federal government should teach local communities how to create defensible space, and how to prepare efficient community evacuation plans.

The federal government is allowing corporate logging companies to cut down trees on 56,000 acres when most communities are far from the "restoration" area. The concept of restoration to some artificial desired condition based on sketchy information regarding past landscapes to protect communities from inferred potential future risk through this set of prescriptions in the Midnight "Restoration" Project sets a damaging precedent for the rest of the forest, including the upper Methow Valley.