



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

December 3, 2025

Midnight Project Reviewing Officer
Pacific Northwest Regional Office
1220 SW 3rd Ave.
Portland, Oregon 97204

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide a letter of support for the Midnight Restoration Project that is currently in the objection period.

AFRC is a regional trade association whose purpose is to advocate for sustained timber yield harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities within and adjacent to the Okanogan-Wenatchee National Forest, and management on these lands ultimately dictates not only the viability of their businesses but also the economic health of the communities themselves.

AFRC is not writing to object to this Project; rather, we are submitting this letter to encourage the Forest to move quickly to Project implementation. AFRC staff and members are very familiar with the project area and the current forest conditions. We submitted scoping comments on May 13, 2023 and Draft EA Comments on May 7, 2024. We have also participated in several trips to the project area.

The Midnight Restoration Project was initially part of the 77,000-acre Twisp Restoration Project in the Methow Valley Ranger District, introduced in November 2019. The Twisp Project underwent extensive surveys, analyses, public engagement, and modifications prior to July 2021, when the Cedar Creek fire burned into portions of the project area. AFRC has participated in several field trips to the area and sent letters of support for the 24,000-acre, scaled-back Twisp Project, which moved forward, treating only matrix unburned lands following the Cedar Creek fire. The District determined that the subwatersheds affected by the Cedar Creek fire and related suppression actions

needed to be reassessed to evaluate treatment needs and actions, and dropped 53,009 acres from the original Twisp project, which is now the Midnight Restoration Area.

AFRC complimented the work that Resilient Forestry did in their landscape evaluation, which found that the project area is currently departed from conditions that would be resilient to disturbance and climate change. Landscape-level assessments show that current departures in forest structure, spatial patterns, and fuel loads favor larger, more severe disturbances relative to historical baselines and hinder adaptation to climate change.

Why is AFRC Supporting the Project?

Available Timber is Critical for our Members' Operations

The District did an excellent job of their economic analysis which finds the Project could yield up to 60 mmbf of timber and generate \$10.6 million in timber receipts. While there is no milling infrastructure located in the immediate area, current industry interest in the Twisp and Mission timber sales highlights how important timber volume is from the Methow Valley District to the broader purchasing community.

Technical reports from 2010 and 2012, completed for the Forest Service, determined, among other things, that:

- The forest products sector helps sustain the social, economic, and ecological benefits of forestry in the United States.
- Product revenues sustain economic benefits that include jobs and income.
- Ecological and social benefits can be supported by timber revenue to landowners that helps keep land in forests and by forest treatments that can help maintain ecological functions.
- Wood products fulfill fundamental needs per capita and have remained competitive with alternate means of meeting those needs.
- US lumber production and demand is expected to increase through 2040.

The importance of our members' ability to harvest and remove these timber products from the timber sales generated by this Project is paramount. Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on Forest Service land, particularly those lands designated as Matrix. Studies have shown that for every 1 mmbf of timber harvested, about 12 direct and indirect jobs will be created. As the Forest Service surely knows, the "restoration" treatments that are desired on these public lands cannot be implemented without a healthy forest products industry in place, both to complete the necessary work and provide payments for the wood products generated to permit the service work to be completed.

AFRC Supports Treating Stands Over 80 Years of Age

AFRC strongly supports the District's forest health treatments in stands designated as LSR over 80 years of age. We believe that harvest can and should be done in LSR stands over 80 years of age, when the purpose is wildfire risk reduction in certain provinces. Furthermore, we believe that forest management should be based on known stand attributes, not on an arbitrary age limitation. The selection of 80-years as the ultimate barometer for treatment needs in LSRs was

based on overgeneralized assumptions about late-seral forest habitat development. At the stand-level, site-specific forest conditions and needs should dictate treatment development, not arbitrary age limitations.

The 80-year limit does not apply to the East of the Cascades Province, particularly for wildfire risk reduction work. Instead, the 80-year limit only applies to the West of the Cascades Provinces. As pointed out, large patches of dense forests have developed across the landscape, and many of these stands are over 80 years of age but still of a small dbh size. To accomplish the goal of promoting larger fire-resistant trees and healthy forests for the future, these smaller trees over 80 years of age need to be thinned out.

Further pointing out the need for treating stands in LSR areas over 80 years is the fact that high-quality nesting and roosting habitat for the northern spotted owl is sparse within the project area, occurring almost exclusively in forests that are highly departed from sustainable conditions. To support the northern spotted owl, there is a need to retain the existing complex forest structure in these small but unsustainable areas. The only way to protect these areas from fire is by reducing fuel and creating resilient structures in the surrounding forest. Since almost all current high-quality habitat exists in locations that are not environmentally suitable for dense forest over the long term, there is also a need to maintain and create dense, complex forests as replacement habitat in locations that will continue to support it as the climate changes.

AFRC Supports Needed Forest Plan Amendments

AFRC supports the District requesting other Forest Plan Amendments to improve attainment of desired conditions. These include:

Forest Plan Old Growth

- Two forest-wide S&Gs (S&G 5-1 & S&G 19-8) would be amended to allow treatments in stands that meet the Forest Plan's definition of mixed-conifer old growth (FPOG).

Snowplowing Designated Snowmobile Route

- One forest-wide S&G (S&G 17-8) would be amended to allow for snowplowing up to 12.1 miles of a designated snowmobile route in the Twisp River drainage to provide access during winter harvest treatments.

Deer Winter Range Cover

- Two Forest Plan S&Gs (S&G Management Area [MA]14-6A and MA26-6A) would be amended to allow treatments that would reduce deer winter range cover on up to 1,971 acres to levels below those specified in Forest Plan S&Gs.

Mountain Goat Habitat

- A Forest Plan S&G (S&G MA10-8C) would be amended to allow for expansion of the portion of Gilbert Trailhead by 0.15 acres to provide safe transportation access and increased parking for the Twisp Pass and North Lake Trailhead. This S&G amendment was determined to have minimal impacts on mountain goat habitat.

- Another Forest Plan S&G (S&G MA10-20A) would be amended to allow for unscheduled timber harvest on 558 acres to improve mountain goat habitat. This amendment would bring about a reduction of competition for water, sunlight, and soil nutrients for the large, old tree component of the stands, and lead to a higher chance of forest to survive summer drought and wildfires. Without the treatments allowed by this amendment there would be a higher chance of losing these stands to wildfire.

Stands Over 80 Years Old*

- One NWFP S&G (NWFP C-12) would be amended to allow harvest of up to 2,569 acres of stands over 80 years old and include a mix of young and old forest with multistoried layers, densely stocked or overstocked. These stands increase inter-tree competition for resources (light, water, nutrients) and reduce the overall health of these stands, causing tree mortality and elevated risks to insect and disease outbreaks and stand-replacing wildfire events.
- *If the LSR Working Group supports the need to thin and allow fuelwood gathering in project LSRs as described to reduce wildfire hazard, there would be no need to amend NWFP S&Gs and this amendment would be dropped from the project.

Fuelwood Gathering*

- One NWFP S&G (NWFP C-16) would be amended to allow fuelwood gathering on up to 385 acres within site-specific areas of Late-Stage Reserves (LSRs).
 - *If the LSR Working Group supports the need to thin and allow fuelwood gathering in project LSRs as described to reduce wildfire hazard, there would be no need to amend NWFP S&Gs and this amendment would be dropped from the project.
- Project Screening

AFRC Supports the Use of Condition Based Management

AFRC believes the Forest clearly outlined the management proposal which includes treatments in the pre-identified specific locations in Riparian Reserves, LSRs, IRAs, FPOG's and wherever fuel breaks are proposed. The Forest Service used a condition-based management approach to outline treatment proposals on areas outside of these locations, comprising approximately 25% of the project area. District staff identified areas considered for condition-based management by using existing vegetation and fuels data and developing criteria for the conditions that would benefit from treatment and meet the Project's Needs.

The Proposed Vegetation and Fuels Treatments are in the chart below.

Table 1. Proposed Vegetation and Fuels Treatments

Treatment Type	Treatment Name	Maximum Amount	Need Addressed
Understory Vegetation Thinning (Outside of Overstory Vegetation Treatment Areas)	Stand Improvement Thin	Condition-based: 5,383 acres Site-specific: 8,120 acres	Needs #1, 2, and 4
	Fuelbreak Maintenance (Matrix)	Site-specific: 336 acres	
	Fuelbreak Maintenance (LSR)	Site-specific: 56 acres	
	Total Understory Vegetation Treatments	Up to 13,895 acres	
Overstory Vegetation Treatments	Matrix Thin	Condition-based: 5,904 acres Site-specific: 244 acres	
	LSR Thin	Site-specific: 4,051 acres	
	Riparian Reserve Thin	Site-specific: 374 acres	
	Owl Habitat Enhancement Thin	Site-specific: 58 acres	
	Fuelbreak New (Matrix)	Site-specific: 292 acres	
	Fuelbreak New (LSR)	Site-specific: 451 acres	
	Total Overstory Vegetation Treatments	Up to 11,374 acres	
Fuel Reduction (Prescribed Burning) (Locations overlap areas proposed for thinning. Except for landing pile burning, all acres proposed for prescribed fire could be treated with initial and maintenance treatments)	Burning Hand Piles or Machine Piles Followed by Underburning*	Site-specific: 13,265 acres	Needs #1, 2, and 4
		Condition-based: 11,143 acres	
	Landing Pile Burning	Site-specific: 269 landings Condition-based: 300 landings	
	Underburning Only	Site-specific: 2,696 acres Condition-based: 248 acres	
	Total Prescribed Fire	Up to 27,352 acres	
	Hand Fireline	110.5 miles	
	Machine Fireline	18.7 miles	
	Total Fireline	Up to 129.2 miles	
	LSR Fuelwood Gathering	Site-specific: 385 acres	
			Need #4
Transportation Management	Hazard Tree Removal	Site-specific: Up to 141 miles of open NFS roads	Need #3
	Temporary Road Construction Associated with Log Hauling	Site-specific: 8.3 miles	Needs #1, 2, and 4

The understory vegetation condition-based work will all be non-commercial and be composed mostly of precommercial thinning, including activities in the Sawtooth Inventoried Roadless Area. The overstory vegetation condition-based work will all be done in the matrix lands, and much of this will be done with DxP. All other land designations will have site-specific treatments. AFRC believes the outline of treatments and this chart provides the clarity needed for good unit layout and treatments.

AFRC Supports the Use of Fuel Breaks

There are 1,135 acres of fuel breaks, either new or for maintenance, along ingress/egress routes to improve firefighting effectiveness within and adjacent to Wildland/Urban Interface. As pointed out in the assessment, there are a large number of danger trees and unhealthy trees along most of the major routes within the area. AFRC strongly recommends performing shaded fuel breaks along these major roads to not only remove the danger trees but provide anchoring points for containment fire lines should a large fire start. AFRC suggested treating 300 ft. on each side of the major ingress and egress roads into the project area for public safety. AFRC also would support shaded fuel breaks along major ridge lines as a precautionary move for slowing or stopping future wildfires.

AFRC Supports the Proposed Work in the Riparian Areas

There are 374 acres planned for thinning in the Riparian Reserves. These treatments would help protect aquatic systems, maintain, and restore the composition of species and structural diversity of plant communities in riparian areas, and maintain and restore habitat to support well-distributed populations of riparian-dependent species, consistent with the Aquatic Conservation Strategy (ACS) objectives in the NWFP.

AFRC submitted several studies in our Draft EA comments that we believe show that there exists a declining rate of returns for “protective” measures such as no-cut buffers beyond 30-40 feet. Resource values such as thermal regulation and coarse wood recruitment begin to diminish in scale as no-cut buffers become much larger. We believe that the benefits in forest health achieved through density management will greatly outweigh the potential minor tradeoffs in stream temperature and wood recruitment, based on this scientific literature. We urge the Forest Service to establish no-cut buffers along streams no larger than 40 feet and maximize forest health outcomes beyond this buffer.

AFRC Supports the Logging System Analysis

The Draft EA states: *Creation of detrimental soil conditions would be minimized by using advancements in technology, such as tethered and aerial cable logging, as described in the design criteria. Tethered logging and cable systems are designed for steep slopes and studies have identified that, in many circumstances, soil disturbance from tethered and cable logging is still below environmental and regulatory thresholds.*

One of the primary issues affecting the ability of our members to feasibly deliver logs to their mills is firm operating restrictions. We understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service contracts (i.e. dry conditions during wet season, wet conditions during dry season). We appreciate the Forest Service’s stated methods (above) for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there.

We appreciate seeing the recognition of tethered-assist equipment in the project proposal. Tethered-assist logging is becoming a more economical, safe, and available method of yarding on steep slopes throughout the region. The weight displacement provided by tethering allows tracked equipment to operate on steep ground with limited soil displacement or compaction. Standard psi levels for that tracked equipment are transferred to the tethering uphill.

AFRC Supports the District’s Draft Climate Change, Greenhouse Gases, and Carbon Sequestration Report

The District addressed the Council on Environmental Quality’s (CEQ) published Guidance on Consideration of Greenhouse Gas Emissions and Climate Change, which provides recommendations for addressing climate change in Environmental Assessments (EAs) and Environmental Impact Statements. This guide recommends that agencies consider the effects of projects on GHG emissions, the effects of climate change on the project area and Proposed Action, and climate adaptation measures included in the project.

AFRC agrees with the District’s assessment on climate change that points out: *Areas most suitable for each type of forest are shifting due to drought and disturbance associated with the changing climate. By 2055, over a third of dry forest in the project area is expected to experience levels of drought stress that are currently seen only in habitats that are too dry to support forest. Similarly, three-quarters of the moist and transitional forest is expected to experience levels of drought that are currently characteristic of dry forest. When environmental conditions change, a forest can*

*experience low vigor, low resistance to disturbance, and increased mortality. **There is a need to anticipate these forest type shifts and re-align vegetation with its environment to improve climate change resilience***

AFRC Would Like to Continue the Dialogue on the Proposed Road Work

In our Draft EA comments we questioned the miles of roads that will be decommissioned. See the chart below:

Table 2. Proposed Transportation Changes

Road Type	Existing Miles	Post-Project Miles					
		Open NFS Roads	Open NFS Roads – Admin Access Only	Closed NFS Roads	Non-System Roads	Decommission	Decommission to Trail or Stock Driveway
Current Open NFS Roads (ML2, 3, 4)	102.3	82.7	3.9	2.1		9.7	2.6 (trail) 1.3 (stock)
Current Closed NFS Roads (ML1)	35.7	1	1.1	16.3		17.1	0.3 (trail)
Unauthorized Roads*	32.3	1.2	3.2	-	0.7	26.7	0.4 (trail)
New Permanent Road Construction	-	0.1	-	-		-	-
Total Miles	170.3	85.0	8.2	18.3	0.7	53.5	3.4 (trail) 1.3 (stock)

If the Forest proposes to decommission, abandon, or obliterate road segments from the Midnight Restoration Project area we would like to see the analysis consider potential adverse impacts to fire suppression efforts due to the reduced access caused by the reduction in the road network. We believe that this road network reduction would decrease access to wildland areas and hamper opportunities for firefighters to quickly respond and suppress fires. On the other hand, additional and improved roads will enable fire fighters quicker and safer access to suppress any fires that are ignited. As has been pointed out in the literature, this landscape is highly prone to large wildfires and quick initial action is needed to keep fires from becoming large.

Thank you for the opportunity to provide a letter of support for the Midnight Restoration Project. We look forward to seeing the Midnight Project implemented promptly to address the forest health and fire risk concerns in a timely manner.

Sincerely,



Tom Partin
AFRC Consultant
921 SW Cheltenham Street
Portland, Oregon 97239