

Regional Forester, Objection Reviewing Officer – PNW Region, USDA Forest Service

1220 SW 3rd Ave., Portland, Oregon 97204 **Attention: 1570 Appeals and Objection

Dec. 6, 2025 Electronically Submitted: cara.fs2c.usda.gov PROJECT 63933

Midnight Restoration Project Final EA - Okanogan National Forest, Methow Valley RD

Comments on Final EA proposed action:

BACKGROUND:

I have a long history in the Methow Valley and consider the Upper Twisp River Valley to be a rare and special mountain valley. There are many restoration projects being proposed on the Methow Valley Ranger District in the upcoming years; of all these, the Upper Twisp River Valley is perhaps the most sensitive and valuable as a unique landscape. Winter snows come early, and Spring snowmelt extends well into early summer, rendering a moist river bottom. This landscape warrants special care in the proposed action to restore forest resiliency. I am leading a group of volunteers taking pre-harvest inventory plots of timber sale Units in the ongoing “Twisp Restoration Project”. Our intent is to continue this inventory work on the Midnight restoration project as it unfolds. This is a project of the Methow Valley Citizen’s Council (a member group of the North Central Washington Forest Health Collaborative) in collaboration with the Forest Service. We are working with Kerry Kemp, the forest ecologist, Eireann Peterson, the District silviculturist, along with Adam McClelland, the District’s presale forester. Among our volunteers are several retired Forest Service employees with a great deal of experience and expertise. Among the experience represented are a Silviculturist, two ex-timber marking crew foremen, a Range biologist and others with field experience. The Forest Service inventory crew from the summer of 2024 was decimated by DOGE cuts, and no longer exists. The crew of MVCC volunteers is the only group in the field on the Methow Valley Ranger District engaging in pre-harvest inventory monitoring on the “Twisp” and “Mission” projects underway as we speak. In addition, I am attending Project Work Group meetings of the NCW Forest Health Collaborative as an interested citizen.

I will limit my objection to the final Midnight EA in four areas of particular interest: Leave Tree Marking, Shaded Fuel Breaks, Large Tree Retention, and Firewood Gathering.

LEAVE TREE MARKING:

I attended two of the three Forest Service field tours in the Fall of 2023 in the Upper Twisp River Valley, in the proposed Midnight Restoration area. During the last field trip I broached the subject of leave tree marking in the more sensitive site-specific areas (LSR, Riparian Reserve Thin). It was suggested by Forest Service personnel that leave tree marking would be on the table as a consideration, rather than a strict DxP model for all areas within the Midnight Project. I strongly urged that the leave tree marking model, which the Forest Service has extensive experience with, not be abandoned in favor of DxP across the board. Per my comments in the **background** section above, the sensitive nature of the upper Twisp River Valley deserves special attention in how prescriptions are written and implemented.

On page B-35 of the “Design Features” Section in the EA, it states: “In general the first preference in Commercial thinning units will be marking trees prior to thinning when

funding or staffing are not available to mark trees, other methods such as DxP or DxD may be used”.

The above provision in “Design Features” is a change from the Draft EA as far as I can tell (correct me if this is incorrect). I was unable to see any reference to this in the Draft EA. If this *is* a new addition to the final EA, it seems a bit puzzling. Again, correct me if I'm inaccurate, but I don't detect any real movement in the direction of more leave tree marking efforts, especially in the matrix. It seems fairly certain that DxP and DxD are the direction the District is heading in. I'm glad that this new language is included in the final EA, especially as it relates to the LSR and Riparian areas, but this is troubling if there is no real intention to use marking in the matrix as “the first preference in Commercial thinning “ The last words of this design feature : “when funding or staffing are not available to mark trees, DxP or DxD *may be used*”. The DOGE cuts, the recent RIFS , and the future cuts promised by this Administration, have left the Forest Service with future funding in doubt and staffing seriously diminished- it would be good to see some more specific explanation of the intent to use marking as a first preference in this EA. My comments on the Draft Midnight EA were very specific in this area of concern.

LARGE TREE EXCEPTIONS:

I have read the Methow Valley Citizen's Council's objection letter comments regarding the cutting of large trees. I have discussed this issue with Collaborative members as well. I am going to submit verbatim the Citizen's Council's comments on the removal of large trees, as it sums up very succinctly the concerns I have surrounding this issue. And I personally want to acknowledge that the final EA has already addressed some of my concerns, which I appreciate as well.

“We appreciate and acknowledge that the final EA has addressed some of our concerns from the Draft. Most notably, it closes many of the exceptions to cutting large trees between 21-24.9” DBH. This exception (except for hazard trees) is removed from the Dry Forest Matrix Thin and Riparian Preserve Thin. Within the LSR the exceptions are limited to 3 trees every 10 acres and 609 trees over the entire LSR. We request that these trees be marked and documented prior to implementation so that large tree cut limits are not left up to the operator's discretion. Marking is the only reliable way to ensure large-tree retention. Retaining large trees ranked as one of our most significant draft EA comments and an important concern of the local community. Documentation and transparency around the cutting of large trees could go a long way in bringing the public along.” (Methow Valley Citizen's Council, Final Midnight EA objection letter comments, Dec. 6, 2025)

SHADED FUEL BREAKS:

In the research literature, the use of shaded fuel breaks is most effective and valuable when implemented close to the wildland/urban interface, where high value assets (homes and towns, and human lives) are present. The efficacy of these fuel breaks in the upper Twisp River Valley (specifically along the Twisp River Road) is an “overbuild” in my opinion. The distance between the wildland/urban interface is miles, and there is already the Twisp River Road and the Twisp River itself acting as ready made fuel breaks, in a traditionally moist river valley habitat. Frequent maintenance (approx. every 7-10 years) is required to keep the fuel break effective at slowing the advance of a fire, and there is valid doubt that the District will have the manpower or resources to accomplish that maintenance. This area is a very scenic corridor that lends itself to a non-commercial understory thin and piling /burning. The non-commercial

thinning and piling areas that the District has implemented on the Twisp restoration project have been well executed, and look great. That treatment regime would be a much better fit for the shaded fuel breaks proposed along the Twisp River Road scenic corridor.

Shaded fuel breaks would “**result in the loss of suitable owl habitat on most of those acres.** These stands would no longer have a high enough canopy cover to provide habitat for northern spotted owls (John Rohrer, Methow Valley RD wildlife biologist, commenting on the Twisp Restoration Project, 2020)

Shaded fuel breaks can also have the opposite effect as intended “by acting as “wicks” for fire spread, if not maintained routinely to remove ingrowth” (Fox & Ingalsbee 1998).

“Shaded fuel breaks should be prioritized in locations with elevated risk to highly valued resources and assets, with access to suppression resources and where they can be effectively maintained”. (“The Role of Shaded Fuel Breaks in support of Washington’s 20-year Forest Health Strategic Plan: Eastern Washington”. By Hersey and Barros, Jan. 2022 Washington Department of Natural Resources, Forest Resilience Division)

There is no rock solid plan in the final EA to maintain these shaded fuel breaks after implementation. Maintenance is mentioned, but there is only a vague reference for the need to maintain, with no real commitment of Forest Service resources and funding to accomplish the task.

I encourage the ID team and other officials to seriously consider a modification to the proposed action regarding the shaded fuel breaks along the scenic corridor of the upper Twisp River Valley, as outlined above. Seriously consider the non-commercial thin and piling Rx option along the Twisp River Road scenic corridor- it is worth a second look.

FIREWOOD GATHERING IN LATE-SUCCESSIONAL RESERVES:

I would like to see the firewood gathering provisions in the proposed action regarding LSR’s in the Twisp River valley floor be removed, and that no firewood gathering be allowed in these LSR’s, with the exception of cull decks specifically signed as available to firewood cutters. Policies for snag removal within the Midnight Restoration Project LSR areas should remain in place, consistent with current Forest policy. Under the final EA proposal, the amendment altering NWFP “Standards and Guidelines” (NWFP C-16) would allow fuelwood gathering on up to 385 acres within site specific areas of LSR’s. There are any number of areas less sensitive to degradation from firewood cutting on the Methow Valley Ranger District that are available to the public. This is a small concession to ask of the planning team- to disallow firewood cutting in the LSR’s in the upper Twisp River valley, with the exception of clearly marked culling decks for firewood gatherers. Again, of all the projects for restoration that are being proposed in the future, the Twisp River valley is perhaps the most unique and valuable and more than worthy of special protections within the final iteration of the Midnight Restoration Project EA.

FINAL COMMENTS:

I was self-employed for 30 years, and submitted hundreds of job bids over the years. I understand more fully than most the need for companies of all sizes to be able to make a profit

and have predictable flows of income to stay alive in a competitive market. At the last NCWFHC Project Work Group meeting on Dec. 4th, the subject of the bidding process for timber sales was discussed. I recognize that these objections to the final EA of the Midnight project will remove some stumpage volume from the timber sale. I realize that the economic viability of these restoration timber sales is a consideration. In the case of this very special habitat in the upper reaches of the Twisp River Valley, I believe that economic constraints should not drive the final decision making process. There are times when economics are an acceptable driver of decision making and there are times when other considerations eclipse profit margins on the sale of Federal Timber. In this case, removing some timber volume from the sensitive areas discussed above, on the Midnight project in the Twisp River valley bottom, is an acceptable public tradeoff and represents only a small segment of the overall landscape scale projects being planned on the Methow Valley Ranger District.

I ran a plumbing business in Twisp for 30 years. One of the projects I volunteered my services to plumb was the Ice Rink in Winthrop. A few years later I volunteered again when there was a major problem with the under slab cooling loops at the Rink. The economics of these volunteer efforts did not pan out for me personally (I was pulled from other paying jobs to volunteer in my community). I'm proud to say that the project has been an incredible success and economic driver for the Methow Valley, and has benefitted us all. The upper Twisp River Valley is a gateway to the Lake Chelan Sawtooth Wilderness and the North Cascades National Park. There are trailheads to the high alpine lakes that are becoming more popular by the day. The economic analysis in the EA is weak and doesn't sufficiently address how the economics of tourism and Wilderness / National Park access will be affected during the implementation. The scenic corridor, the other issues mentioned earlier, and the importance of maintaining a special esthetic in the upper Twisp, should be the driver of your final decision making process on the Midnight project as it relates to the Twisp River bottom. There are plenty of other restoration projects being proposed that will not have these same concerns or restrictions. The upper Twisp River Valley needs to be treated differently, and with extraordinary care.

Thank you for considering these comments in your deliberations.

Sincerely,

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