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Comments: December 5, 2025

Regional Forester, Objection Reviewing Officer
Pacific Northwest Region, USDA Forest Service
Attn: 1570 Appeals and Objection
1220 SW 3rd Ave
Portland, Oregon 9720
Electronically submitted: https://cara.fs2c.usda.gov/Public/ReadingRoom?Project=63933

Re: Midnight Restoration Project Draft Decision Notice and Final Environmental Assessment

Dear Regional Forester and Objection Reviewing Officer,

On behalf of Methow Valley Citizens Council (MVCC) and its members, thank you for the opportunity to submit objections on the Midnight Restoration Project's Proposed Action. Since 1976, MVCC has raised a strong community voice for the protection of the Methow Valley's natural environment and rural character. MVCC represents several hundred members and over 1500 supporters who deeply value the Twisp Watershed and its special qualities.

As a local community organization, with many members living, working, and recreating in the Twisp Watershed, MVCC has participated extensively in the development of the concept for this proposal - with the intent of helping to craft a scientifically sound, community supported, and ecologically-relevant forest restoration project. MVCC played a leading role in a working group that collaborated to develop a pre-scoping landscape evaluation, purpose and need, and proposal. We participated in pre-scoping field tours in 2022, submitted scoping comments on June 10, 2023, and submitted comments on the Draft Environmental Assessment on May 16, 2024.

MVCC has signed on to a letter of support for the Midnight Proposed Action from the North Central Washington Forest Health Collaborative. As a member of the Collaborative, we support the Purpose and Need of this project. Our objection, which we hope will be interpreted constructively, stems from several remaining concerns raised in our comments on the Draft EA that were inadequately addressed and diverge from the Okanogan-Wenatchee National Forest Restoration Strategy and established Forest standards and guidelines.

Our Methow Valley community carries a wide range of opinions on active forest restoration projects that are planned and implemented on the public lands surrounding our homes. Opinions cover a spectrum between enthusiastic support and full-throated opposition. As an organization who works to raise a community voice to protect our natural environment and rural character, it is important for us to listen to our community (just as the Forest Service takes input and listens to the public). Something we hear consistently from our community about the Midnight Project (as well as Twisp and Mission Projects) is frustration with a perceived lack of open, public engagement around the project from the Methow Valley Ranger District. Significant mistrust and misinformation have grown to fill the vacuum of information and insufficient transparency about these Projects. In the last year, MVCC launched a citizen science monitoring program to help the Forest assess stands pre- and post-treatment. The monitoring program was initiated in part to reconnect Forest Service managers of this landscape with the public, as well as demonstrate to community members that there is

accountability on the landscape scale projects in the Twisp Watershed. Based on our experience, we believe that one of the most significant actions the District can take to make this a successful project is to ensure that implementation follows the proposed action and that communication with the public is frequent and clear.

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". These exceptions (except for hazard trees) are removed from the Dry Forest Matrix Thin and Riparian Reserve Thin. Within the Late Successional Reserve (LSR), the exceptions are limited to 3 trees every 10 acres and 609 trees over the entire LSR. We request that these trees are marked and documented prior to implementation so that tree selection is not left to the operator's discretion. Marking is the most 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 cutting large trees could go a long way in bringing the public along.

MVCC's remaining concerns, previously raised in our Draft EA comments and insufficiently addressed in the Final EA, are outlined below. Further details can be found in MVCC's Draft EA comments from May 16, 2024 (attached). We hope you'll consider these concerns in a final decision that pursues ecological restoration and is consistent with the Forest's directives.

Public Firewood Gathering in LSR

Modifying NWFP C-16 to allow public firewood gathering inside Late-Successional Reserves undermines LSR objectives. Large volumes of firewood are available to the community outside of LSRs that do not require an amendment. This amendment allows harvesting prominent snags that provide invaluable habitat. The assertion that removing these snags changes fire behavior is not backed up by a citation in the Final EA and runs counter to established modern fire science emphasizing that large dead wood contributes minimally to fire spread and is ecologically irreplaceable. Additionally, snag removal is acknowledged in the vegetation specialist report of the Final EA to have adverse impacts on northern spotted owl, American goshawk, white-headed woodpecker, marten, and primary cavity excavators.

While the Final EA claims that snag reduction impacts are offset by prescribed-fire generated snags and road decommissioning that will impede future access for fuelwood collection, it does not provide citations that justify the adverse impacts on wildlife habitat. Policies for snag removal within the Midnight Restoration Project area should remain consistent with current Forest policy and an amendment that has been in place since 1994.

Dwarf Mistletoe Management

The Final EA contradicts and misapplies its own mistletoe management guidance. Authorizing the removal of 21-24.9" trees is not consistent with Hoffman's management recommendations, which emphasizes the retention of large/old trees, even if infected, unless infection is severe (>4 rating). The Final EA directs the removal of trees with only mild-tomoderate infection (DMR = 2) and uses mild-to-moderate mistletoe infections to justify cutting medium/large trees. Removing the largest and oldest mistletoe-infected trees while retaining small levels of mistletoe will maintain homogenous mistletoe infection rates and eliminate the best wildlife trees. Hoffman typically reserves tree removal for DMR = 4 in many stand types, especially in late-successional forest where mistletoe contributes to structure. We request that trees removed due to mistletoe infections be marked and documented prior to implementation so that large tree cut limits are not left up to the operator's discretion.

Logging on Steep Slopes

Okanogan Land Resource Management Plan Standards & Guidelines 13-9 explicitly directs that ground yarding systems "should not" be used on sustained slopes >35%. The Midnight project authorizes routine machine felling, bunching, dragging, piling and mastication up to 45% slopes and cable/tether systems on 46-80% slopes. Exceeding a clear slope threshold established in the Management Plan without going through the same formal amendment and Planning Rule analysis that was exercised for old growth, deer winter range, and NWFP standards presents concerns. The EA does not frame this departure from the 35% "ground yarding" standard and does not analyze a reasonable alternative that would limit ground-based equipment to =35% slopes and use only hand thinning above 35% slopes.

As noted in the Final EA, the volcanic ash mantle of project area soils is highly susceptible to erosion. Volcanic ash-mantled soils are well-documented in USDA and Forest Service soil science as highly susceptible to displacement, rutting, and erosion when mechanically disturbed, due to their low bulk density and weak aggregate structure (NRCS Andisol descriptions). Significant soil disturbance from tracked equipment and their skid roads and the subsequent deep rutting left behind from cable logging can be seen on the gentle to moderate slopes across the Mission Restoration Project. We would predict similar impacts on steep slopes within Midnight Restoration Project. Cable yarding impacts to large and old trees that were girdled for use as anchors during the Mission Restoration Project, emphasizes the importance of a clear proposal for how this will be avoided when logging on any steep slope in the Midnight Restoration Project. We suggest that only understory thinning be conducted on slopes within the Midnight Project that are steeper than 35%, unless a viable alternative presenting minimal impact can be put forward.

Reopening Roads

We appreciate that the district has removed from the current proposal the building of any new, permanent roads. Decommissioning as many roads as possible (of which only 6% are currently open roads) in the project area will have a beneficial impact.

We are concerned about the impacts of 8.3 miles of new temporary roads and reject the need for building any new temporary roads in LSR as proposed in Canyon Creek. There is no environmental effects analysis for the 8.3 miles of temporary roads anywhere in the specialist reports or EA. We request that a reasonable alternative that avoids or minimizes temporary road construction is analyzed or a clear, evidence-based explanation for why such an alternative was considered but eliminated from detailed study is provided.

We are also concerned about the proposal to re-open approximately 43 miles of currently closed and unauthorized roads. Closed and unauthorized roads in the Project Area are presently in a range of conditions from drivable or walkable to revegetated and not hydrologically connected. The Forest's own analysis of the impacts of opening these roads contradicts the assertion of "minimal disturbance." The Transportation Specialist Report identifies these roads as having multiple deficiencies that would require reconstruction actions including grading, reshaping, compaction and, in some cases, maintenance-level changes to accommodate hauling. Those are not "minimal disturbance" actions and it is false to claim there will be "no meaningful reconstruction."

Instead of acknowledging the significant impact in the Transportation Report, the Final EA adopts the Soils and Hydrology Specialist Reports that state roads have intact prisms requiring minimal work. To adequately analyze the impact of reopening closed and unauthorized roads, a record needs to be provided of the current condition and the ability to reclaim these roads without adverse impacts. If many of these roads are currently vegetated, the construction associated with opening these roads could be comparable to the

impact from many miles of new road construction even if proposed to be closed or decommissioned post-project.

Thank you for reviewing our objections. We look forward to the opportunity to discuss our concerns and find acceptable resolutions to issues among all interested parties.

Sincerely,
Mary Yglesia
Interim Executive Director
Methow Valley Citizens Council