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Comments: Comments regarding the Midnight Mountain Restoration Project.

First I would like to address the length of time we were given to comment on the project. We were really given only 23 days to comment on the project. The newspaper of choice is the Wenatchee World. Many local people would not know to look there. There was no announcement in the Methow Valley Newspaper, except they did write an article about the project and announced that the next day the Project Open House was scheduled. (This is not the newspapers fault.) How could anyone, who works, needs childcare, etc. plan for the meeting.

The next problem is the Collaborative of which the Forest Service is an Ex Officio participant. The existence of the Midnight Project was not revealed to the general public until after the Collaborative, its members and the Forest Service had been meeting regarding the Midnight Project. And this is after the TRP had been reduced. One of the changes to the Twisp Restoration Project, after the fire, was dropping the entire upper and middle Twisp River watersheds, which are composed almost entirely of Late-Successional Reserves. The upper and middle Twisp River watersheds are now part of the Midnight Project. This is segmenting a project, which under NEPA is not allowed.

Here is the Collaborative's purpose statement: The purpose of the North Central WA Forest Health Collaborative is to advance forest health through transparent, collaborative actions that improve forest resiliency, preserve terrestrial and aquatic habitat, protect natural resources, provide recreational opportunities, promote utilization of natural resources, and support the local economies of Chelan and Okanogan Counties.

What I am hearing from various people is they are asking, "why so far out?" When discussing the Wildland Urban Interface, I would really like to see the Forest Service work very near to private properties that abut the National Forest lands. Logging miles from residences is not aimed at fire prevention to protect communities.

There are examples in the Twisp River drainage that do demonstrate the use of appropriate thinning. The example I am thinking of is Coal Creek Rd. This was done prior to 2015. The area I am talking about is indeed close to residences and where this was done the fire laid down in 2015. But I will emphasize that this was closer in, than many miles out, which is the case in the Mission Project.
I was told by a group of foresters at a small tour of the Mission area, that it was for fire prevention and to help save the Town of Twisp and the Buttermilk residents. But this was miles away. Not close to the town or residents.

It is logging under the guise of fire prevention. It is logging under the guise of "restoration".

If the Mission Pond area that has been logged for "aspen release" is anything like what is in store for the Midnight Project, I strongly object. I visited the area last year after all the bulldozing and visited it several weeks ago and it looks about the same. Quite dismal. Plus the cattle were in the wetland that is Mission Pond last year.

Here is what I would like to see with the Midnight Project.

No Late Successional Thinning of trees along Twisp River Rd. The fires from 2018 and 2021 did a good job of introducing fire to the area. Leave the area alone.

There should be no "Condition Based Management" nor Designation by Prescription. Trees must not be marked by loggers. Only by silviculturists.

No linear unnatural fuel breaks along the roads. This is especially apparent after the Twisp River Fire. I would also like to see the very large piles burned, up Twisp River and up Little Bridge Cr. I do hope the Forest Service intends to remedy this situation next year. Will we get more of the same with the Midnight Project?

No ridge line fire breaks. Most of the ridgelines up Twisp River don't have that many trees on them. When looking across from high hills, I can see the dozer lines still there from the 2018 fire.

The economic gain to the community will be very little. With one logging company and 8-10 employees, I can hardly see this as an economic gain. The cost to the community is the roads that will need to be repaired after many logging trucks using the Twisp River Rd.

No new roads. Some old roads are decommissioning themselves. No need to go in and work on them with any machinery. I've walked many of them and they are becoming overgrown. There are a few roads that could be left open. There is one above our house between Coal Cr. and Myer Cr. up Twisp River that can be used for firefighting access. The neighborhood uses it for skiing, hiking and biking. No motorized use is allowed.

No taking of trees over 12" diameter.

Independent alternatives must be considered.

Any activities must be independently monitored.

There must be a full EIS prepared. This cannot and should not be "fast tracked". The Forest Service and the Collaborative have excluded the public in this process. How does that work in gaining the public's trust?
Finally, the forest should not be shaped and adapted the way the Forest Service and the Collaborative wants it to be. We all have to adapt to it. We choose to live near it. We need to respect it. Fires will happen, we know that. Knowing that, everyone needs to make their homes Firewise, including the towns.
Thank you,
Pearl Cherrington
Twisp River

On January 26, 2022, three months after informing the Collaborative of Midnight and inviting its participation in developing the Proposed Action, you announced to the general public the reduction in size of the TRP. However, you chose not to reveal the existence of Midnight until 15 months later. This despite the fact that Midnight had already entered the planning phase, via disclosure to the Collaborative, and resultant initiation of contract work to develop a silvicultural prescription through Resilient Forestry, as commissioned on behalf of the Collaborative by The Wilderness Society.