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Title:
Comments: Subject: Formal Objection to the Midnight Restoration Project (Project #63933)

To:
Objection Reviewing Officer
U.S. Forest Service

Date: 11/13/2025

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Dear Reviewing Officer,

I am submitting this formal Objection to the Midnight Restoration Project (Project #63933) in the Twisp River Watershed. As a resident of the Methow Valley and frequent user of the upper Twisp River area, I am deeply concerned about the significant ecological, social, and cultural impacts this project will have on our community and this irreplaceable landscape.

1. Inadequate Public Involvement

Opportunities for public involvement have been grossly inadequate given the project's far-reaching social and ecological implications. There were no public meetings, and the comment period was abbreviated, providing minimal time for meaningful review of the Draft Environmental Assessment (EA) and technical materials.

2. Lack of Accessibility and Transparency

The EA is not written or organized in a manner accessible to the general public. Citizens without specialized knowledge of forestry or public lands law cannot reasonably understand the impacts on resources that local residents deeply value. Key information regarding environmental and community consequences is either unclear or understated.

3. Social and Recreational Impacts Ignored

The EA fails to adequately assess the project's direct social and recreational impacts. Commercial logging operations extending over 20 years will disrupt popular camping, hiking, fishing, and biking areas. The noise, dust, and hazards from heavy logging equipment and tens of thousands of log trucks traveling through residential zones, scenic corridors, and rural communities are largely ignored. This will dramatically alter the natural character of the Twisp River Corridor that so many value for its undisturbed beauty.

4. Misrepresentation of Project Purpose

The stated primary purpose of the project is misleading. The emphasis on fire safety and forest health appears secondary to large-scale timber production. Exporting logs from the Methow watershed to distant sawmills provides little to no benefit to our local community or economy.

5. Failure to Present Reasonable Alternatives

The EA presents only a single action alternative, implying there is only one viable path forward. This denies the public-and those with expertise in defensible space and community wildfire protection-the opportunity to consider or propose alternative approaches that may achieve the stated goals with less ecological and social harm.

6. Violation of the Northwest Forest Plan and ESA Protections

The project violates the standards set forth in the Northwest Forest Plan, particularly by allowing commercial logging within Late Successional Reserves-habitats essential for species listed under the Endangered Species Act.

7. Unsupported "No Significant Impact" Finding

The EA's claim of "No Significant Impact" is scientifically and logically unsound. Achieving the project's objectives inherently requires major alterations to ecosystem conditions-by definition, these are significant impacts.

8. Selective and Incomplete Use of Science

The EA relies heavily on studies that support large-scale commercial operations while omitting credible scientific literature that raises concerns about the ecological consequences of extensive logging and prescribed burning.

9. Misrepresentation of "Historic Conditions"

The project's portrayal of "historic" forest conditions is scientifically flawed. It is based on incomplete data and ignores the dynamic nature of ecosystems influenced by factors such as climate change, fire regimes, and natural disturbance cycles.

10. Climate and Carbon Impacts

The claim that this project enhances climate resilience is contradicted by its removal of thousands of tons of carbon-sequestering trees. In reality, the project will release stored carbon and may increase the likelihood and intensity of future wildfires.

11. Lack of Long-Term Management Plan

The project fails to address how the proposed "restored" conditions will be maintained over time. Forests are dynamic and ever-evolving, and mechanical alteration to mimic a perceived "historic" state is neither scientifically justified nor ecologically sustainable.

12. Flawed Management Methods

The implementation of Condition-Based Management and Designation by Description undermines the enforceability of project standards. Contractors should not be granted discretion to select which trees to remove or to modify prescriptions post-decision. Such flexibility invites abuse and eliminates meaningful oversight.

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In Summary:
The Midnight Restoration Project, as currently proposed, threatens to irreversibly alter the Twisp River watershed, harm wildlife habitat, degrade recreation opportunities, and undermine public trust in transparent and science-based forest management. I urge the Forest Service to withdraw the current proposal and develop a new plan that incorporates genuine public participation, multiple alternatives, and credible ecological science that

prioritizes long-term ecosystem health over commercial logging interests.

Thank you for considering this objection. Please ensure my concerns are entered into the official record.

Sincerely,
Carmelita Salas
Resident of Twisp River Valley