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Comments: I am writing as a member of the North Cascades Conservation Council, the Methow Forest Forum, the Methow Valley Citizens' Council, and Olympic Environmental Council as author of previous comments to the draft Midnight Restoration Project EA, 2024. As a retired salmon habitat ecologist, commercial fisher, and survivor of the Carlton Complex Fire 2014, and 45-year resident of the Methow Valley in Okanogan County, Washington State, I am writing in support of the North Cascades Conservation Council's Objection to the Midnight Restoration Project # 63933 as it is proposed by the Okanogan/Wenatchee National Forest Service. The federal policy of building roads and logging big trees does not reduce the risk of wildfires but rather increases the risk of wildfires. DellaSala and Hanson,eds., The Ecological Importance of Mixed-Severity Fires: Nature's Phoenix (Waltham, MA:Elsevier, 2015) Although the Midnight Restoration Project is advertised as a fuels reduction project, it is actually a logging operation with numerous negative impacts. The Midnight Project will NOT "restore" the 56,000 acres of forest that it intends to heavily log along the Twisp River Corridor

Environmental law in the United States lacks an effective implementation of Precautionary Principle but an analysis that considers the best available science has been standard for a very long time and this approach - superimposing assumptions about what forest type is "suitable" and presuming that one can anticipate climate change adaptations that will be required at a landscape level, and that the most appropriate solution to these problems involves a return to logging practices so remarkably similar to that they would probably be nearly indistinguishable to an uniformed observer from those practiced in the 1970s - the very practices that created a vast range of problems for species throughout the region including those that are now listed under ESA - appears to this reviewer to be every bit as arrogant and as ill advised as assuming that climate change was not occuring.(Breskin objection 2023)

Therefore consider it crucial that assumptions about impacts of these treatments be tested and validated prior to implementation on a wide scale. The promises of increased water availability and increased timber output and some sort of a goldilocks zone with a few widely spaced trees in the name of reducing fuel loading and protecting homes are totally unsubstantiated by landscape level experimental data, and making management decisions that would apply untested methods that appear to contradict what is known about the behavior of water in watersheds to a 25,000 HA drainage based on an analysis that does not consider a wide range of outputs is both contrary to common sense and contrary to NEPA .

Some may applaud the use of prescribed fire, understory thinning to remove ladder fuels and trees < 10" DBH, and road decommissioning to decrease erosion, sedimentation, and habitat fragmentation but there is no discernable evidence in the EA that those outcomes are either palusible or fully funded for implementation after the commercial timber is removed. Also similar to your other recent/current projects, I have several main concerns, all centered around the proposed overstory thinning treatments. Most critically, I am unclear why the timber sale model is being utilized for this project, given the funding made available through the Bipartisan Infrastructure Law. If we didn't have to commodify our trees, the focus of the treatments could remain squarely in the project's stated needs -- in particular, Needs #1, 2, and 4. I have no doubt that the overstory thinning carried out under the Mission Project would have looked very different if completed by a contractor working for the USFS, rather than a contractor working for the purchaser, in an environment where everyone was trying to maximize their profits. Given that the District will likely proceed with the timber sale model, however, there are a few other concerns I wish to highlight. First, the exceptions to the 21" DBH diameter cap in effect just makes for a blanket 25" DBH diameter cap. The dwarf mistletoe rating criteria look reasonable on paper, but in the field that is presumably quite subjective and would be particularly squishy to a contractor working for the purchaser of the trees. Again thinking of the Mission Project, diameters may be underestimated on the ground and sticking with a clear, no exceptions, lower diameter limit are essential for accountability.

Second, concerns about planned logging on steep slopes have not been adequately addressed. The EA contemplates harvest operations on slopes of 45-80% using cable, tether, or helicopter logging. Again, the Mission Project provides an example of what not to do. Significant soil disturbance from tracked equipment and deep rutting from cable logging can be seen on the moderate to steep slopes in some of those cutting units. Cable logging also damaged large/old trees in that timber sale. The EA could have used the DNR Landslide model but chose not too.

Third, the creation of new shaded fuel breaks within 200 feet of roads and ridges creates extensive new "edge" habitat and contributes to habitat fragmentation, without clear gains in protecting the WUI (unless located literally at the WUI's edge). Roads already affect the permeability of the landscape for many wildlife species, even without an extra 200 feet of cleared forest on either side. And establishing new fuelbreaks along ridges where no roads currently exist introduces unnecessary new disturbance to otherwise natural areas, invariably (and irreversibly) introducing noxious weeds and soil erosion, and diminishing wildlife habitat value, all for theoretical catastrophic fires that may or may NOT ever encounter that ridge, and may or may NOT be stopped by the fuelbreak.

These are just a few of my concerns as the EA shows little consideration to comments received from science- and conservation-minded individuals and groups during the NEPA process. As the Forest Supervisor stated in a public venue " OWNF wants to be a donor forest by exceeding forest targets and having enough to help other Forests reach their targets". There is more extraction proposed than is ecologically sustainable. This is not making any nearby community safer from theoretical wildfire but opens more roads to human incursion that is actually the leading cause of wildfire. The public needs Federal resource managers to provide alternative ways of meeting community resilience objectives that have fewer ecological tradeoffs and community tradeoffs.

In Draft EA Comments, 2024, Conservation Northwest wrote detailed comments that have not been be addressed before adoption of the Final EA and Cumulative Impacts Statement, 2025 as follows:

"Stand Densities
We support the Midnight prescriptions that include language and a desire to retain resilient and complex structure using the ICO (individuals, clumps, and openings) method. In contrast with recent projects implemented on the MVRD, we would like to see more
medium to large clumps where it is sustainable. In the future, we recommend trying to simplify some of the language in prescriptions and their exceptions, such as writing strict stand densities in the prescription rather than a range of densities that creates an unclear
residual target. We support the absence of condition-based management and the use of site-specific management in land allocations such as LSR, Riparian Reserves, Inventoried Roadless Area, and the Owl Enhancement Thin units. It is unclear in the draft EA how the treatments are designed from the landscape evaluation process. The leave tree densities under the proposed prescriptions are nearly identical to the historical ranges of variability (HRV) and departures identified in the landscape evaluation. Since HRV and departed conditions represent stand conditions from a time when trees were two to four times the diameter of the trees present in stands, it is
important to design prescriptions for the currently available size classes. Until the trees grow larger diameters, prescriptions that immediately reduce the present stand density to historic stand densities will create vulnerable leave trees. Thinning beyond resilient dry
forest densities creates greater regeneration that must be noncommercially thinned in the future. We are concerned that prescriptions are trying to achieve historical stand densities at the time of implementation rather than trying to grow trees to meet the size class of
trees modeled in departed conditions.

Prescriptions that instantly reduce the present stand densities to historic stand densities do not factor post-

harvest mortality. Residual stand density targets must consider post-harvest disturbance that will result in further tree mortality, thus reducing the residual stand density even further. Insects, fungi, diseases, windfall, mechanical damage, and prescribed fire are all forces that will lower the stand densities below the desired density described in the EA. Resource specialists reviewing projects may not have a complete picture of these post-harvest disturbances and may be creating recommendations about future wildlife habitat, plant populations, and soil quality based on a described target densities rather than the eventual residual densities that will be on the ground over time.

Stand Diversity

We are concerned that the proposed prescriptions do not include enough clear language to maintain stand diversity. We do not recommend sanitizing any tree species completely out of a stand or unit. Under the proposed prescriptions, even mature whitewoods
(subalpine fir, Engelmann's spruce, and lodgepole pine) will be eliminated from dry forest stands and many moist forest stands. While we understand the proposed action is intended to reduce wildfire risk, tree species diversity can be accomplished while reducing wildfire risk by designating a few clumps and individual large trees of whitewood species. The thin bark associated with whitewood species is vital for black-backed and three-toed woodpecker foraging; eruptive finches depend on mature spruce cones; 20- to 50-year-old whitewood stands represent prime spruce grouse habitat; and regenerating whitewood trees are vital for snowshoe hare and Canada lynx. Whitewood species have the lowest timber value and most residual trees will be eliminated after a prescribed fire, creating snags for black-backed woodpeckers, so there is no incentive to completely remove mature whitewoods.

We recommend ensuring that all participants involved in vegetation management understand which tree species are present in each unit. Despite the absence of grand fir and other true firs from nearly every acre of the project area, the Midnight project still
mentions a desire to remove true firs from units. We recommend marking or flagging western white pine, as well as informing contractors about the differences between western white pine and lodgepole in units where western white pine is present.

We support strategies to increase aspen stands where clones are present in conifer stands, but it is unnecessary to remove every single conifer less than 21" DBH (21 inches diameter breast height) if it is within 50 feet of a few aspen clones. Releasing aspen can be
accomplished without removing large conifers if daylight is still significantly increased. Retaining a few conifers amongst aspen will increase the diversity of the stand as the aspen grows around it.

Forest Health

Conservation Northwest supports reducing mistletoe in strategic ways that will lower the risk of infection at the landscape level while maintaining sufficient mistletoe populations for wildlife where it is most sustainable. Dwarf mistletoe is an important habitat feature for
northern spotted owl, western gray squirrel, American goshawk, evening grosbeak, and dusky grouse. Applying the proposed Hawksworth rating system, heavy mistletoe infections of individual trees will be removed but mistletoe will remain present in every
unit. A better strategy is pre-identifying the stands and trees where mistletoe is desired for associated wildlife species, retaining most of the worst infected trees because they represent the best wildlife habitat and cannot be processed by mills, and removing all trees with any mistletoe from adjacent stands to decrease the rate of spread. This will improve the heterogeneity of the mistletoe population and retain the largest or oldest Douglas-fir trees that the local public are concerned about retaining in dry forests.

The distances to allow removing mistletoe-infected trees using the Hawksworth ratings has increased from scoping to the draft EA, including in the LSR treatments. The Matrix shaded fuel break sanitizes all mistletoe. According to Hawksworth, mistletoe spreads

slowly and individual infections only last 2 to 8 years. Even if a residual tree is heavily infected, it will have minimal impact on the future presence of mistletoe if the proposed prescribed fire is implemented. Remaining infections will be killed after follow-up treatments with prescribed fire, as well as the new Douglas-fir cohort. As we noted in our scoping, we are increasingly concerned with the OWNF's perception that mistletoe will be successfully treated out of stands by removing the most heavily infected trees. We do not understand why the Owl Enhancement Thin includes removing heavy mistletoe infections and root rot pockets when they are key habitat features for northern spotted owl and other species of wildlife dependent on late successional forest structure such as American goshawk. Like important stands of mistletoe, root diseases should be designated and retained in areas where it is most sustainable. Treatments requiring heavy machinery do not remove the roots that hold the root rot infection and, in some cases, exacerbate the stand conditions that create root disease in adjacent stands. Individual trees with root disease or a dwarf mistletoe infection with a Hawksworth rating >2 should not be used as rationale to remove live, dying, or dead trees greater than 21" DBH.

Specific Wildlife Considerations
Snags and Primary Excavator Habitat
While we support increasing the safety and maintenance of Forest Service roads within the project area by removing hazards, we believe that the hazard tree removal presents many more opportunities to retain habitat than what is currently proposed. The current proposalsuggests removing trees with many wildlife habitat characteristics such as leans, splits, broken tops, and rot. Leaving high stumps and snags within a safe falling distance of the road edge maintains the largest, most important wood structure while eliminating the hazardous risk to the road. It is also important to consider that roads are often built near riparian areas, in draws, and where timber is productive, so roads exist amongst some of the largest diameter tree structure in the entire forest.
Future fuelwood collection and
Project-Specific Amendments
The Midnight project proposes two project-specific amendments to the Northwest Forest Plan (NWFP) regarding the "Standards and Guidelines" that affect forest management in Late Successional Reserves (LSR). The first proposed amendment (NWFP C-12) concerns forest management of stands more than 80 years old in LSRs and the second proposed amendment (NWFP C-16) affects fuelwood gathering in LSRs. Conservation Northwest does not support either project-specific amendment and we suggest that the first proposed amendment (NWFP C-12) is unnecessary. Thinning in stands older than 80 years is already permitted in eastern Washington LSRs for hazardous fuel reduction. Is the intention to treat stands older than 80 years old for silvicultural reasons or blatant harvest targets that are not declared in any publicly available documents?

We could support the proposed amendment to collect fuelwood in LSRs (NWFP C-16) if additional information about the cumulative impacts to primary excavators, fisher, and Pacific marten were included in the draft environmental assessment and accompanying wildlife report. Unfortunately, fuelwood gathering has the greatest impact on the largest available dead wood. the proposed Forest-wide Hazard Tree Removal Project, the hazard tree removal included in Midnight Restoration project, and the fuel reduction in adjacent landscape-scale projects, the effects of removing dead wood should be quantitatively evaluated for species with life histories dependent on its quality and abundance through an EIS.

Adoption of a project-specific amendment to the NWFP's standards and guidelines for LSR management is unnecessary and inappropriate in the Regional LSR Assessment update and updates to the Northwest Forest Plan will affect all LSRs in the OWNF, including the LSR within the Midnight Restoration project. These unquantified prescriptions create an unaccountable impact from the incentive to remove almost all commercially desirable trees without regard quantitatively to the overall cumulative impacts to all species of concern.

The soil analysis (missing during the Draft EA comment period) does not define or map sensitive soil areas other than wetlands. Friable glacial soil stability is of as great a concern as the sediment from culverts that may be removed. Stream temperatures due to canopy removal in the Matrix commercial logging and in the LSRs, Riparian Reserves, and Spotted Owl Thinning have not been analyzed to the level of an EIS over the total

contiguous projects of Twisp River, Midnight and Upper Methow. Together these total project impacts must demonstrate quantitative evidence that viable late successional structure for a variety of wildlife species in dry, moist, and cold forests will be retained. "

These comments are intended to show by one example the discrepancy in detail and expanded areas of concern necessary to provide the public, decision-makers and the courts a verifiable account of cumulative impacts across almost 200,000 acres of the Methow Watershed. The missing detailed analysis can only be fulfilled by a complete Environmental Impact Statement. Thank you.