Data Submitted (UTC 11): 12/9/2025 12:50:42 AM
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Comments:
Objection to the draft FONSI and Final Environmental Assessment for the Midnight Restoration Project 12/8/25

Thank you for this opportunity to comment. I appreciate the hours spent on this and the later FAQ's that were issued. I also recognize that the USFS is operating with reduced staff and funding. I am a retired public school teacher of 32 years with a special interest in science and vocabulary development. I worked for the USFS for 10 summer seasons here in the Methow Valley as a fire lookout and forestry technician. I have resided full-time in the Methow since 1978 and am a member of the North Cascades Conservation Council and Methow Forest Forum.

First, I wish to emphasize these points and to express my agreement with others on the below items:

A. The FONSI/FINAL EA on the Midnight project is extremely difficult to wade through, and definitely not readable to much of the population - especially on such a tight timeline. Extensive advanced vocabulary and the technology skills required to access documents (especially within in such a short time period) truly limits inclusion for much of the public. For example, it was very difficult to find the exact date and time submissions were due. I finally did a Google search to find the notice in the Wenatchee World (a daily publication which is not local to the Methow Valley.) Public awareness of the actual impact of the proposed projects combined is low.

B. The process for development of the Final E.A. wasn't a democratic process: The initial conception and development of the proposed action, along development of the preferred alternative occurred in meetings during which participation was largely out if reach for most of the public - and certainly without an opportunity for meaningful participation; the bulk of any opportunities engaging the public were to give information to the public rather than to allow discussion of the issues. This objection process is now open to only those of us who filed an objection to the E.A earlier this year. Some interested members of the public have just recently become aware of the extent of the projects in acreage, impact, and years of disruption.

C. The Project Purpose and Needs were not properly stated. The Purpose and Need are based on generalities about forest health, forest pathogens, and climate change. The condition of the forests in the area of the project and adjacent areas of the Methow Valley watershed should be addressed. The soils analysis is weak and fails to address the underlying value of the microbiome to forest health and the impact of this project upon its essential microorganisms such as mycorrhizae, which protect against drought and disease. And drought protection is crucial during this time in history and for this project in particular. (See below comment on Need #2.)

D. The Decision's Finding of No Significant Impact (FONSI) is unjustified: A well-understood definition of "No SIGNIFICANT IMPACT" is lacking. This FONSI does not give a complete picture of the grave nature of these forest management actions over time, across the Methow Valley ecosystem, and its impact upon the inhabitants of the Methow. What would be significant if this isn't?

E. To offer only one Action Alternative is inappropriate and unscientific. Other possibilities that could be introduced by (and to) the public for consideration as to how to address our climate crisis and encourage healthy forests do not come up for public consideration during this process. In view of this, the "all or nothing" emergency approach is not logical nor appropriate scientifically. The weak statement here indicates a highly subjective process: "The project silviculturist, wildlife biologist and other specialists affirmed that the research used in their analysis, published between 1960 and 2020, provides robust support for these amendments, and that no research has been published that provides a strong basis for countering the research used in this

analysis. " (Midnight response to comment letters 24 & 75). Valid research supporting a more natural process for restoration, not only within the USA but also internationally, has been published since 2020 and studies are ongoing. This is a rapidly growing science, and only information published since 2020 addressing the timelines of these extended projects is not reasonable nor scientific.
F. The Cumulative Effects Analysis is inadequate: Separation of the Midnight and Twisp projects is inappropriate. For that matter, the damage done (and ongoing) under the adjacent Mission Project should also have been considered in this scenario, which treats all projects under the same erroneous assumption of "the fewer trees, the less fire." The Twisp River tributary and the whole Methow Valley watershed are affected along with the past and future proposals. They share streams, fish, wildlife, and human values.

G. Designation by Prescription (DxP) is inappropriate: This practice has been shown in the adjacent Mission Project to have caused unnecessary damage to the forests. In particular, I am still concerned about unnecessary damage to wetlands, such what occurred at Mission Pond within the adjacent Midnight Project.
H. Impacts to recreational use and resulting economic impacts are not disclosed: There is no substantive discussion as to the impacts the Midnight Project will have on traditional recreation uses in the Twisp River Corridor, nor how the project will affect the economy of the town of Twisp and related safety concerns (for example, logging truck dangers and the impacts of smoke). Possible serious impacts to public use of the very popular adjacent Sawtooth Wilderness and its accessibility are not revealed. The possible impacts upon the Sawtooth Wilderness in regards to violations of PSD requirements under the Clean Air Act for Class 1 Air should have been addressed.

I. Real impacts from new/reconstructed roads are not fully analyzed: The impacts of 30 miles of road reconstruction and eight miles of new road construction are not discussed in terms of impacts to wildlife, dispersed recreation use, or water quality. Likewise, the real impacts of many miles of road reconstruction and eight miles of new roads are not disclosed.

J. Logging Activity Locations and Compliance with Standards are Unclear: There do not appear to be distinctions of logging and burning units in maps provided in the Final EA.

K. Departure from Northwest Forest Plan directives for Protection of the Northern Spotted Owl: I agree that it's alarming that this project is being rushed through prior to the forthcoming amendments to the NWFP. Therefore, it is concerning that measures required in the NWFP for the protection of mature forest-dependent species are not being followed.
L Departure from Northwest Forest Plan Directives for Protection of Riparian Areas and Aquatic Habitats: It appears that a number of violations of the NWFP directives for the protection of aquatic species that rely on the integrity of riparian reserves, as well as terrestrial species that require riparian reserves for dispersal, are being ignored.
M. Forest Plan Amendments: I agree with this question: Is there a reason for the seven forest plan amendments initiated for Midnight other than the desire to cut more timber? A project requiring seven forest plan amendments to proceed should not be conducted without amending those forest plans. In addition, so-called amendments to the NWFP render the NMFS and FWS conclusion of "no jeopardy" for the NWFP invalid within the range of the Spotted Owl. New language indicates that logging the LSR will occur regardless of Regional Ecosystem Office approval, which is unprecedented in the 30 years of the NWFP. See also "E" above in regards to the amendments.
N. Concerns with Consultation and Impacts to Listed Species: For a project of this size and with 14 listed species that may be affected by the project, it is unacceptable that consultation with the National Marine Fisheries Service and Fish and Wildlife Service has not been completed prior to a final EA for a project of this size, with 14 listed species being possibly affected. Also the listed species that inhabit the project area should be considered.
O. There is No Wildfire Prevention Plan and No Adequate Plan for Escape: The most important step in making communities and people safe from wildfires is to prevent them from occurring. The next most important is to

provide escape routes in the case of (especially) wind-driven wildfire (such as occurred in Paradise, CA.) The Okanogan County Community Wildfire Protection Plan (OCCWPP) authored by the Okanogan County Conservation District and cited in this FONSI) has no target dates for any of the mitigations mentioned in this regard and no real sources of funding. This is especially tragic in view of the deaths that have already occurred due to wildfire entrapment in our county. See below, "Need #4" for additional comments. The lack of sufficient planning to designate the numerous dead-end roads in our forest and county in order to prevent unnecessary deaths by entrapment by wildfire is shocking.
P. New Information: Significant amounts of information in the project record were released after the public's opportunity to comment on the draft EA. Additionally, there is more information that needs to be publicly released before the public can provide informed comments on this landscape level project. After incorporating all this information, a new draft EA or EIS should be issued, giving the public the opportunity to comment on Midnight.

Next, I wish to point out that several of my comments on Needs #1-4 in the Draft EA were apparently not considered by the authors of the FONSI . I repeat and expand upon them below.

NEED #1: Move Current Vegetation Structure, Spatial Patterns, and Composition Toward Desired Reference Conditions (Previously "Late-successional and Riparian Reserves, understory diversity, and unique habitats")

My comments:

* "If wildfire suppression in the past is largely to blame for mega fires or fires of high intensity, why does this plan not encourage natural wildfires to burn under appropriate conditions, times, and locations, thus reducing the wildfire suppression by humans that has (according to this viewpoint) actually caused or contributed to the problem in the first place?

*"This plan should contain a decision tree (as was previously being utilized by the agencies before the Yellowstone fires) that would address which wildfires would be allowed to burn and under what conditions (time of year, location, proximity to population centers, under what weather conditions, cause of ignition, etc.)?" This does not appear as one of the alternatives.

* "All science does not necessarily support the importance of reducing high-severity fires for forest health. Historical research does not substantiate that high-severity fires did not regularly exist in the past in healthy forests. Different findings and newly developed perspectives should be considered, not disregarded, and Alternatives should be developed to acknowledge their existence. Recent findings substantiate the theory that fires that create the highest level of biodiversity (and thus forest health) are lightning-caused over diverse ecosystems, creating areas of mixed severity of fire.. As commenter Sarah Lane stated in Scoping comments, "Wildfire science, and information on the effects of logging to reduce fire risk is far from settled, and the Forest Service cannot cherry- pick the studies that support logging, they must consider all the science." A mosaic of varying levels of fire intensity is desirable for forest health. And as NCCC has commented, "Without a plan to allow fire to resume its natural role, the forest will revert back to its former condition over time." Utilization of only research and observation done through 2020 is not adequate.

NEED #2: Protect and Maintain Wildlife Habitat and Complex Forest in Strategic Places.

*The discussion does not consider to any appreciable extent the benefit of natural wildfire as to the best creation of habitat diversity and protection of species that are dependent upon snags and burned landscapes (ie: Black-headed woodpecker, etc. Refer to Hanson, et. al)
https://www.biologicaldiversity.org/news/press_releases/2014/black-backed-woodpecker-04-02-2014.html

*Soils/mycorrhizae : Science is now exploring the intricacies of mycorrhizal fungi related to old growth forests and the interrelationship of trees and tree species via these fungi. We do seem to know that when mycorrhizae are present, plants are less susceptible to water stress. It is also known that different species of trees relate to and support each other through the networks of mycorrhizae in the soil. These interrelationships do exist in a diverse forest setting. This information should raise the flag of caution in the current trend toward creating large monocultures of Ponderosa Pine forests, which it appears is one unstated goal underlying this "Restoration" project - which appears to minimize the mixed conifer forest, especially in the sections relating to LSR 's. https://www.nytimes.com/interactive/2020/12/02/magazine/tree-communication-mycorrhiza.html'

NEED #3: Provide an Affordable, Safe, and Efficient Transportation System and Reduce Sedimentation from Roads on National Forest System (NFS) Lands)

Safe Transportation System: There has been little attention given to the problem of possible entrapment on dead-end roads in case of wildfire. The Okanogan County Community Protection Plan does not provide steps toward solving this particular problem.

Decommissioning of roads: There isn't any discussion of how or when the necessary funding for these actions will be required. Under this plan, the engineers and hydrology staff would be determining whether/which culverts would need to be removed. Will there be delays due to lack of funding for these individuals and their work time? Will this cause deterioration of water quality, including temperature and turbidity, along with the decline of essential benthic macro invertebrates and the species that feed upon them?

NEED #4: Reduce Fire Risk to Communities, Reduce Hazards Along Ingress/Egress Routes, and Improve Firefighting Effectiveness Within and Adjacent to Wildland-Urban Interface (WUI)

My Suggestions for improvement in regards to Need #4:

*Identify and work with other governmental bodies and partners to post signs on dead-end or impassable roads to avoid entrapment. Dead end roads outside the towns still have not been identified nor is there any apparent plan.

*Work with other "partners" and governmental bodies to supply directional signs (arrows pointing to landmarks or towns, with mileage in case of egress from wildfire.)This has now been accomplished along the South Summit at French Creek. Thanks to the Methow Valley Ranger District. Areas other than the South Summit still need to be identified as possible evacuation routes from the Methow Valley in the event that HWYs 20 and 153 are closed.
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*Twisp's vulnerable position encompassed by the Twisp River WUI, along with a lack of regulations in the Town of Twisp to mitigate wildfire within the community (by hardening of homes etc.), is an issue.The Okanogan County Community Protection Plan is cited by the Final EA/FONSI as containing mitigation measures; however, the Town at this point appears to have few or none of the financial resources that might be involved. Instead of creating fire breaks many miles from town, I suggest that funding focused upon hardening the Town of Twisp would be a better solution to this need.

FINALLY

DISCUSSION: NEED FOR AN EIS, INCLUDING A REASONABLE RANGE OF ALTERNATIVES.

As defined at 40 CFR 1508.1(z), "Reasonable alternatives means a reasonable range of alternatives that are technically and economically feasible, and meet the purpose and need for the proposed action."

My previous Comment: It's incumbent upon the USFS to prepare a full Environmental Impact Statement. A section should be included included regarding expected cumulative impacts of related and already-proposed projects in the Methow Valley.. The EIS should include a wide range of Alternatives based upon various perspectives as to the history of fire and promotion of healthy forests, including recent studies and scientific observation. Lessons learned from the so-far unfortunate Mission Project and for the future intended "restoration"projects in the northern end of the Methow Valley must be included. Fires move up and down the Methow Valley. So does wildfire, and so do smoke and logging trucks. The Methow River drainage is one ecosystem. The Draft EA excluded reasonable Alternatives proposed by the public for various inadequate reasons, such as not being "reasonable." The USFS cannot claim the benefit of "partners" and collaborating agencies/groups and their financial contributions with one breath and then state that economics do not permit consideration of additional alternatives. Below are possible alternatives suggested by the public but dismissed in this EA. ("Reasonable alternatives" means a reasonable range of alternatives that are technically and economically feasible and meet the purpose and need for the proposed action.")

PROPOSED ALTERNATIVES:

My previous comment to Draft EA: Merely two Alternatives addressing "All or Nothing" extremes, as in Alternatives #1 and #2 below - is not a reasonable approach for such an extensive proposal upon which human welfare as well as healthy forests and life in general in this valley depends. This is a complex issue involving trees, fire, microorganisms in the soil, threatened species, human survival, economics, history of fire and forests, and other issues. We need at least one alternative that focuses on protecting homes, communities and private property, and promoting healthy forests along with all aspects of forest health - rather than "focusing only on an attempt to change the composition of the forest ecosystem to our advantage."(North Cascades Conservation Council)

Alternatives proposed for the Final EA

Alternative 1: No Action (proposed by USFS)

Alternative 2: (Proposed by USFS), the currently proposed Alternative, which assumes that low-intensity fire and logging are the essential solutions to our climate change dilemma.

Alternative 3: (Proposed by the Public, rejected by USFS) A Forest Health and Human Adaptation Alternative based upon the alternative theory that mixed fire intensities (including high intensity fire) are a natural and essential part of a healthy forest and that there are ways humans can and must adapt to this reality. This could also include, at minimum, protection of Apex predators, the mycorrhizal network of healthy forest ecosystems and other elements of the soil as part of a healthy forest ecosystem.

Alternative 4: (Proposed by North Cascades Conservation Council, rejected by USFS) NCCC alternative as proposed, and/or NCCC Alternative combined with Alternative #3 (Mixed Fire intensity) above and/or any other reasonable alternative suggestions or combination of suggestions from the public. The NCCC Alternative was entitled "the Methow Fire Risk Reduction and Biodiversity Conservation Alternative." The NCCC alternative or combination of the NCCC alternative plus other public suggestions as summarized in #3 above are reasonable. There is no current consensus on the science regarding historic conditions upon which the USFS proposed alternative relies, and successful strategies geared toward public safety are not adequately addressed in the

proposed alternative. This situation demands multiple alternatives to choose from, including at least #3 and #4 mentioned above. I fully support the Methow Fire Risk Reduction and Biodiversity Conservation Alternative, submitted by the North Cascades Conservation Council. I also support the elevation of the benefits of mixed fire intensity as an integral part of healthy forests.

THE US FOREST SERVICE DETERMINATION THAT THE ALTERNATIVES PROPOSED BY THE PUBLIC WERE INADEQUATE IS ARBITRARY AND CAPRICIOUS.

My previous Comment to draft EA: The Forest Service rejected several alternatives with this generality: "In general, the proposed actions in this alternative did not meet the definition of a reasonable alternative because they were outside the scope of, and/or did not meet project needs for, the Midnight Restoration Project's Purpose and Needs for the Proposed Action."(https://www.ecfr.gov/current/title-40/part-1508#p-1508.1(z)). For example, on the "Incorporation of Elements of Mixed-Severity Fire" in Alternatives, the USFS states: "The IDT considered an alternative that allowed for mixed-severity fire as "natural forest management" and emphasized the need for humans to adapt to these higher severities. The commenter did not provide enough information to describe how this alternative would be accomplished. Therefore, the alternative
was not described in detail. The IDT recognizes that mixed- intensity fire has an important place in a healthy forest ecosystem in the project area and does not propose eliminating it."

My response: It's not up to the public to develop a specific and complete Alternative within 30 days, when it took the USFS almost a full year to publish this EA. The USFS only requested additional alternatives from the public, not complete project descriptions with details such as those found in a draft EA. The fact that the ID team didn't specifically propose eliminating consideration of mixed-intensity fire (wildfire), as they have stated, does not mean that this EA adequately addresses mixed intensity fire and its place in maintaining forest health along with the diverse wildlife habitat that low-intensity fire can't achieve. This is a major defect in the EA. A revised EA or a complete EIS with alternatives is necessary.

*Shaded Fuel breaks: Once again, I must agree with others who have stated: "Since this is a restoration project to create a more resilient landscape to extreme wildfire, the need for shaded fuel breaks is greatly reduced. Once treated, fire can burn across the landscape to maintain a healthy forest that can withstand fire. Shaded fuel breaks provide little to no habitat for native wildlife species and extend sight distances from roads that reduces the effectiveness of adjacent habitats."

And, again: "In addition, these fuel breaks present an attractive nuisance for damaging off-road vehicle traffic (and accompanying sedimentation) and should be discouraged, especially far from human habitations. The example of the Eagle Creek fire along the Columbia River (Oregon/Wa) demonstrated the ineffectiveness of this strategy in the case of wind-driven fire." In that case, the fire jumped even the Columbia River.

*The "Edge Effect": Regarding the increase in fire lines to accommodate smaller areas which could be burned during prescribed burning: The "edge effect" was discovered long ago, especially when the Spotted Owl was a hot topic, when biologists found that certain wildlife did not willingly cross over roads, even small ones, that divided up their natural habitats. What has become of the attention this "edge effect" used to attract? The fewer any breaks, even fire lines, the better for wildlife. We are creating more "edges" and less acceptable wildlife habitat with this change; but the impacts of the "Edge Effect" only increase with more roads, more people, additional motorized traffic, and now with more fuel breaks.

Late Successional Reserves - No logging should be allowed in a Late Successional Reserve. This is contrary to the reason for the creation of this land classification. The biodiversity and intricate relationships among trees in such Reserves should be preserved without interference from human beings. Please drop all exceptions for

cutting large, fire-resistant trees trees, especially in the LSR's

DxP: Allowing DxP is to welcome unauthorized cutting of larger trees. The lack of oversight displayed with the Mission Project, which will occur again with such logging , is a great problem with this project and has already been seen in the "model" Mission Project . Take the commercial aspect out of the restoration projects. Trained USFS personnel must mark the leave trees. The outcome of larger scale landscape planning depends upon implementation, monitoring, and follow-up. So far, the USFS has neglected its duty and "allowed the fox to guard the henhouse" in its model project (Mission.) This must be corrected.

Thanks once again for your work.