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Comments:
Cynthia Sandeno
Acting Forest Supervisor
Okanogan-Wenatchee National Forest

Dear Supervisor Sandeno
Please accept my comments regarding the Midnight Restoration Project.

Restoration
Restoration of some form needs to occur to correct the mistakes of past logging. However, logging the Midnight area again, to attempt to correct those mistakes, is the wrong approach. Because it is logging…again. Using heavy machinery is hard on the soils and there are oil and diesel leaks that occur that are there for many years. Bulldozing ridgelines as indicated on the maps are very slow to heal, no matter how much revegetating occurs.
Comment timing
I would like to address the length of time we were given to comment on the project. Thirty days to comment on a document of this magnitude is unrealistic. The newspaper of choice is the Wenatchee World. There was no formal announcement in the Methow Valley Newspaper. However an article was written about the project and gave the link to the Forest Service documents, but that is unacceptable.
Collaborative and FS Transparency
The next problem is that the Forest Service is an Ex Officio participant of the North Central Washington Forest Health Collaborative. There is no representation for the general public. The existence of the Midnight Project was not revealed to the general public until after the Collaborative and 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.
The WUI
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. Chris Furr states in the Methow Valley Newspaper May 8th edition that the primary goal of the Midnight Project is to protect the communities from wildfire. What happened to Restoration? What will protect the communities from wildfire is for the residences of these communities to become as Firewise as possible. For if a fire does reach the towns, from what I am viewing, there is a lot of vegetation against houses and trees are not limbed. No amount of logging will save a town if it is not prepared. See what happened to Paradise, CA. Now many of the areas that have been opened up by logging along the Buttermilk Rd. are a tinder box. See images provided.
In many places single standing trees were left and clumps were taken out on the Mission Project. There were a number of blow downs that occurred and any snags left were taken by people collecting firewood. That is unfortunate as snags provide habitat.
Will we be seeing the same thing with the Midnight Project?
Aspen Release
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 right after the logging took place and then again last year and it looks about the same. Quite dismal. Plus, cattle were in the wetland that is Mission Pond last year. It will take a long time to heal, if ever.
Traffic

Twisp River Road has become a busy county road over the years. There are numerous places that have farm animals pulling equipment to the fields, other animals such as dogs, chickens, and many deer. Also it has become a bicycle route for recreation as well as commuting. And people use the road for walking as well. Many children live in the area known as "the Flats". The speed limit should be lowered on the whole road and logging truck drivers should be made aware that caution should be exhibited. No jakes brakes should be used through the residential areas.
No snow plowing should be allowed on both sides of the Twisp River at the same time above the Buttermilk junctions. Many residents use the roads for recreation in a low snow year, and last winter, 2023, was one of those years. That area of Twisp River received more snow than the main Valley.
And what about fossil fuel use for the next 20 years? The machinery used, the trucks hauling logs many miles away and helicopter logging of which there will be some, will have an adverse impact on the air we breathe.
Recreation
Recreation is an important component of the quality of life in the Twisp River watershed and its viewshed. Many people come to enjoy hiking, biking and skiing on their public lands.

Midnight Project Preferences
There should be no "Condition Based Management" nor Designation by Prescription. Trees must not be marked by loggers. Only by silviculturists.
With careful oversight and "true" restoration, forests can become resilient. Examples of "true restoration" would involve thinning out dog hair thickets by hand, cutting out unhealthy trees, and prescribed burning.
Leave the Late Successional, old growth and riparian areas alone, with the exception of very small trees competing next to large trees. These would be done by hand.
No linear unnatural fuel breaks along the roads. This is especially apparent after the Twisp River Fire.
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. 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 15" diameter.
Independent alternatives must be considered. I support the North Cascades Conservation Council's alternative.
Any activities must be independently monitored. Monitoring must be done onsite daily. It may have been for the Misson Project, where it has been admitted by the Forest Service that mistakes were made but it is not evident that monitoring was effective.
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