

**U.S. Forest Service; Christopher Furr, District Ranger,  
Methow Valley Ranger District**

**RE: Scoping Comments on the Midnight Restoration Project  
Methow Valley Ranger District, Okanogan-Wenatchee National Forest**

June 8, 2023

Dear Ranger Furr and U.S. Forest Service:

After reading—with as much objectivity as I could muster—the Scoping Letter and Proposed Action for the Midnight Restoration Project, I believe the time has come to be frank about these watershed-wide, logging-based forest reconstruction projects the Forest Service is pushing with all its might, while in the process, dodging laws, tossing science in the trash bin, and marginalizing the local public.

By being frank, I mean it's time for me to be frank, and for the Forest Service to come clean.

We in the Methow wait for accountability: an honest presentation in human-speak of what the Forest Service agenda is, why is it using an incomprehensibly biased process for achieving it, any why. I'll begin with a reminder of the Forest Service's record of recent logging projects and proposals in the Methow Ranger District, as Midnight is directly connected to these:

With the Mission Project, the Forest Service changed the logging prescription to increase timber yield after the associated timber sales didn't attract bidders. This is an unconscionable breach of public trust, and an egregious violation of NEPA, as the environmental assessment (EA) did not address the actual impacts of the logging done on the ground, only what was scheduled to occur—but did not—in the original prescription.

Unfortunately, legal action cannot be taken after the fact because the damage is already done. Kudos to you, Ranger Furr, for admitting this breach of promises to the five people you spoke with at the May 18 "open house." That may be the first time I've heard a Forest Service line officer take responsibility for a mistake.

Yet the damage done on Mission continues apace, as firewood cutters have been encouraged by the Forest Service to cut in the project area. I know this, because that's what I was told by the desk clerk while picking up a firewood cutting permit at the Winthrop office six weeks ago. Several residents of the Twisp Valley have noted that many snags have been fallen in the Buttermilk Drainage of the Mission sale area, which compounds the damage (particularly to wildlife) done by the logging, referencing in particular the 20 acre clearcut incised allegedly for "aspen release." And, it appears there is no plan to dispose of the profuse, fire-trap logging slash left at that site, and other Mission logging units. This is the agency vision for fuels reduction?

With the Twisp Restoration Project, the Forest Service rushed the NEPA process, refused to hold a public meeting after major changes were made, and refused to include alternatives offered by citizens in the EA. Further, the EA included only a single action alternative, an outlandish decision that rails against the law, not to mention common sense: does the Forest Service really believe there's only one way to address the issue of forest and fire management over a 24,000 acre landscape? If this dumbed-down process is repeated in the Midnight EA, it will be among the rallying cries for the disenfranchised citizens of the Methow Valley.

Many local people, me included, believe the rush job on Twisp Restoration was designed to take advantage of the weakened NEPA regulations—sliced up by the previous administration—before the Biden Administration could change them back. The Forest Service needs a gut check on accountability.

Now with Midnight, the agency has taken this compromised process a step further with its shamelessly prejudicial public process: it has substituted the 22 companies, trade associations, and organizations in the North Central Washington Forest Health Collaborative for “the public.” Us folks here in the Methow love our home, and bypassing us to ram through a logging project that threatens its ecological integrity by engaging in an insider relationship is offensive to say the very least.

For the record, Midnight's well-documented undemocratic process represents violation of the 2007 Collaborative Act, and the 1972 Federal Advisory Committee Act. But those laws seem to be inconsequential to the Forest Service, only inconvenient stumbling blocks that can be circumvented with political and judicial manipulation.

There are too many concerns with the specifics of Midnight to list them all in the 23 days that was given to comment on the over 800 pages of documents cited in the Scoping Documents folder. I am anxious to hear Forest Service officials justify giving the people in the Collaborative *18 months* of personal attention to develop Midnight, yet only gave *24 hours* public notice of the open house. As for the open house, is this kind of informal forum supposed to masquerade as a true public meeting, where the community can hear everyone's concerns and ideas? I'm not waiting for a response, I already know giving straight answers is not one of the Forest Service's strengths.

As with Mission and Twisp, in Midnight the Forest Service is virtually ignoring the growing body of science that tells us fuels reduction logging is getting us nowhere in the efforts to reduce wildfire risk and combat climate change. According to recent credible studies, in many cases, the logging may actually worsen fire danger. I've cited these studies many times in comments to the Forest Service, but no one seems to take note, so there's no point in repeating them here.

For example, when we look at the local Cub2 fire, we see massive mortality among large old pines in an area that was previously “thinned,” whereas in the Cedar Creek and Crescent

Mountain fires in the Twisp Watershed, the old tree mortality was minimal. What does this tell us? The same thing recent scientific studies have, that logging to protect large trees doesn't work. But the Forest Service just keeps insisting it will work.

As for the logging proposed in inventoried roadless areas, we can only hope this among the "toss-out" provisions the Forest Service includes in its Proposed Actions (like the ATV expansion provision in Twisp Restoration) that it doesn't particularly need anyway, and will be excluded in the preferred alternative so the agency appears to be giving concessions to the public.

Most of Midnight's logging is proposed in Late Successional Reserves as per the Northwest Forest Plan. This is a betrayal of the promises made when Jack Ward Thomas and other agency scientists attempted to protect species in danger of an extinction caused by the voracious Forest Service commercial logging program. Now, the agency proposes to invade these last vestiges of ancient forest that remain. Midnight does not meet the test outlined in the Northwest Forest Plan logging loophole, and I think agency leaders are well aware of that fact, but are as usual erring on the side of more logging.

Meanwhile, the massive logging shows like Midnight, allegedly designed to combat climate change, produce carbon emissions from the trains of log trucks and heavy equipment. They facilitate the reduction of carbon storage in the forest by removing carbon-storing trees, while at the same time the credible predictions from the National Academy of Science of a forthcoming major human-caused extinction event fly over the Forest Service's head like a drunken pigeon. The dismissal of the impacts of these logging extravaganzas on fish, wildlife, and biodiversity have been as casual as a complacent parent turning their back on a child running into traffic.

Adding to the climate change reality is the fact that no one can point to any "historic forest condition," since climate change has completely altered the equation. Yet the Forest Service continues to insist it knows what the forest is really supposed to look like, and uses chainsaws and bulldozers to do the work nature used to do on its own. We call this agenda "compulsive anthropocentric forest manipulation."

We in the Methow wait impatiently for the Forest Service to stop insisting that logging is the answer to every question, and the solution to every problem.

Perhaps the Methow Ranger District, the Okanogan-Wenatchee National Forest, the Regional Forester, or the Chief's office—whichever is pushing this logging agenda—believe federal judges will hesitate to stop a project that claims to be protecting people from fire no matter how illegal it is. I hope they're wrong, we will soon see. But I must ask, what dignity is there in deliberately violating federal law, deceiving the public, and ignoring science?

Sigh...I realize I am not a "friend" of the Forest Service. I've been working with—and against—the agency for 50 years. Still, I am proud of the three years I served on a Forest Service

helitack crew, and I maintain deep respect for the many agency employees who battle wildfires, manage recreation, and attempt to inject objective science into the fuels reduction equation.

Over that 50 years, I've been waiting for one Forest Service official to stand up and tell the truth about the timber supply agenda (as per the dearly departed Gifford Pinchot), and the self-serving agency budget and timber-based staff complement designed to keep the chainsaws buzzing no matter the cost to the ecosystem.

Even Mr. Pinchot would be alarmed by the Forest Service's morphing into a contracting agency at the service of the timber industry. And aw shucks, I recall with great regret the words of Senator Hubert Humphrey at the passage of the National Forest Management Act in 1976: "The days have ended when the forests will be seen only as trees, and trees only as timber."

Sadly, he was wrong.

I urge Forest Service leadership to at least try to salvage some credibility by withdrawing the Midnight Proposed Action, withdrawing the Twisp Restoration decision, and starting the process over from scratch with an EIS, full and open public involvement, respect for objective science, and most of all, concern for the ecosystem the agency has so thoughtlessly afflicted.

Sincerely Yours,

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