

During this short scoping process for the Midnight Restoration Project, I'm submitting the following comments as a salmon recovery professional and former hay rancher that continues to fence cattle out of aspen wetlands.

The public announcement in the Okanogan County Newspaper of Record, the Methow Valley News was unnecessarily short considering private business organizations have been involved in the project planning for over 18 months without notice to the public. This is highly unfair and appears to be an intentional abuse of NEPA and public process.

The primary purpose of this project is to develop a conceptual management plan that addresses the role of timber management on a land management and ignores vast data on known hydrologic history and needs of the Twisp River watershed function and hydrologic processes.

In addition, the plan doesn't consider how upland watershed land management may combine with natural forest disturbance and climate change to affect streamflow and water quality. Since forest characteristics and forest change naturally over time in response to fire, drought and flood, the diversity of forest characteristics, by nature, define the resilience available to adapt across a broad range of site conditions. Maturity, canopy, understory as well as soil composition, depth and development, strongly influence watershed function. These characteristics must be included in the further analysis of this project within the context of viable alternatives that address the other priority multiple use objectives of the Okanogan/Wenatchee Forest, and the Northwest Forest Plan (NWFP), which was officially adopted in 1994..

While the Midnight Restoration Project Landscape Evaluation-Prescription document reviews SOME best available science related to effects of timber harvest, low level fire and thinning of young stands on future manipulated conditions, this document primarily identifies the broadest range of harvestable commercial timber without any analysis of other recent peer reviewed science regarding effects of forest age and diversity on upland hydrological processes as noted by Isabelle Spohn in comments, June 9 , 2023. Further analysis must include a broad range of alternatives available for public review, for each prescription and the cumulative total impacts of the overall expansive treatment acreage of this proposal.

I'm requesting USFS prepare an Environmental Impact Statement that provides alternatives that address a full range of prescriptions for the Midnight Restoration Project. These prescriptions must be accountable to the public prior to the awarding of contracts and loss of control over harvest mistakes as in the Mission Project. These alternative prescriptions should cover the role of forests and forest change in contributing to both carbon storage through leave of older trees and the total watershed function. Complex prescriptions should be replaced with succinct measurable requirements to protect and preserve watershed function in the Twisp River beyond the minimal road sediment component. Summer low flows and water temperature and their effects on aquatic habitat are key issues of concern related to 3 ESA listed fish species, Bull Trout Spring Chinook and Steelhead, in addition to coho recovery.

Complete analysis of multiple prescription alternatives are essential to approximate the impact to the Twisp River hydrology for the three ESA fish species, the habitat they depend on as well as the impacts to the Town of Twisp Public WaterSystem.

Such analysis should define silvicultural practices that are most likely to extend in-situ water storage and slow the export of water out of the watershed to maintain or increase summer soil water availability and streamflow magnitude, and to maintain or decrease water temperature and sediment loading. The road closure proposals may, but are not certain to, assure this outcome. Scarification is an aggressive method dependent on heavy machinery. Proposed roads are of future value as recreational trails if closed properly and the edges are revegetated. Alternatives must be addressed.

The egregious incursion into Designated Roadless Areas is not acceptable without an full EIS analysis of low impact options that do not include commercial harvest. Commercial timber is available for harvest in the designated Matrix area but harvest of trees larger than 10" should not be the only alternative in competition with wildlife, recreation, riparian and overall watershed improvement. The OWNF standards must remain below 20" and less will be evaluated as a watershed protective priority.

Ridgetop firebreak cuts are not justified in the literature as windy areas store more snowpack over the winter season, consist of more mature trees with increased resilience and protect from blowdown on a larger scale. Alternatives must consider other options versus potential of a future fire danger in forest areas well away from habitation.

USFS seems dedicated to protecting at public expense private structures built away from public services and have put USFS staff in harms way here in this watershed. Some alternative must be developed that puts the responsibility of a dangerous investment in the Wildland Urban interface on the community. Communities disconnected from the Urban Interface such as Pine Forest have long been known as a poor investment in a fire prone environment. Large scale harvesting and low level burning are not a guarantee for future safety as already demonstrated in this district. Those structures need to be protected on site by private vegetation management. Clearing the entire watershed forest for a small, ill advised neighborhood, is not the only alternative. Nor is it a USFS obligation that justifies incursion into LSR or Roadless Designations.

Upland hydrological processes also influence watershed streamflow quantity and temperature. The amount, timing, and quality of streamflow in any river is the product of upland watershed processes: rainfall, runoff, soil infiltration, erosion, forest transpiration, soil stability and forest characteristics..

Concerns over low streamflows and high water temperatures are just as important as usfs desired future condition for timber . In addition to a warming climate, human-caused impacts such as forest harvest, road-building, fire, beaver trapping, and in-channel wood removal reduce the amount of water stored or accelerate the export of water from the watershed. Both current

land use practices and legacy impacts affect current watershed function, and will combine to amplify or diminish the projected impacts of climate change. Thus, opportunities exist to adapt management practices and restore watershed function in order to buffer projected climate change impacts. For example, upland forest cover affects the amount and timing of snow and soil water storage, and forest management therefore has the potential to accelerate or delay the melting of snow and the soil moisture retention throughout the warm season. Alternatives must reference these conditions in each potential prescription including addressing the characteristics of both “east side” and West-side forests that occur in this drainage.

Analysis must include modeling of the impacts of atmospheric river events, likely to become more frequent and produce more intense precipitation. These extreme precipitation events have the potential to increase the magnitude or frequency of peak flows and sediment transport.

Although the water balance linkage between snowpack magnitude and streamflow magnitude during the melt season is clear, there are many complex, interacting mechanisms that may amplify or dampen the projected reductions in summer low flows in a warming climate.

Harvest for timber as proposed without strict oversight by accountable USFS employees rather than contracted operators, marked leave trees and a much smaller diameter leave requirement will potentially improve these watershed functions and minimize harmful impacts. Grazing after harvest is counterproductive and should be avoided in all areas but especially in the ridiculous areas designated nowhere as “Aspen Restoration” These outcomes should be analyzed in alternative prescriptions that minimize depletion of soil moisture on the landscape.

Legacy impacts from widespread clearing of riparian forests and in-channel wood removal have contributed to down-cutting of river channels and accelerated export of surface and subsurface water downstream are very different processes and must be included as potential impacts in each alternative across the totality of the Midnight and Twisp River Projects. Extensive salmon habitat restoration of these river systems has been designed to increase sediment and water storage and slow the export of water from the network. The agreed restoration actions in the Salmon Recovery plans will likely be jeopardized without lower impact alternatives and those must be included in an EIS assessment..

I look forward to future public participation in developing a watershed management plan that maintains the hopes and expectations of the Fish and Forest Agreements made during the Clinton Administration. That was a promise to all the users of the watershed. Commercial timber harvest is not necessarily a community benefit but will cost us many headaches as did the well documented impacts of the aggressive cuts of the 1970s and 1980s across the western USA.