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Organization:

Title:

Comments: I object to many, many facets of this project. But the most important facet that you absolutely MUST, MUST change is the upper diameter limit of the trees to be cut to 12 inches DBH.

First, you state that you can't consider the alternative that was proposed which stated that only trees under 12 inches DBH should be cut, to limb all remaining trees to a minimum of 20 feet from the forest floor, then use prescribed burning in the Fall to contain all fire-prone and understory trees. Then evaluate future needs of prescribed burning on an alternating-year basis.

You stated that this alternative was not developed further because using these upper diameter limits would decrease stand diversity facilitating movement towards more even-aged stands over time, which departs further from the historical and future ranges of variability desired in treated areas. This is absolutely not true. You don't have any idea what this forest looked like over 200 years ago. The only people who might know would be the remaining remnants of the tribal people who lived here during that time and the oral histories that they have. What you are doing will significantly reduce stand diversity because almost all of the trees that y plan to cut will be Douglas Fir, and you plan to leave only Ponderosa Pine in its wake. If that isn't reducing stand diversity, I don't know what is.

It is very likely that Douglas Fir grew to hundreds of years in age and hundreds of feet high alongside Ponderosa Pine in this forest, prior to the logging events of the last two centuries. LEAVING ALL TREES REGARDLESS OF SPECIES IN THIS FOREST THAT ARE OVER 12 inches DBH will allow ALL species of trees to remain and to return the forest to its likely historical state.

In addition, there are very few remaining Douglas Fir trees, in the Midnight Project Area that are of the 21-25-inch diameter that is the limit of your planned cutting scope. An upper diameter limit of 21-25 inches DBH gives you a very wide girth to take almost all of the trees in any planned cutting unit. Reducing the cutting diameter limit to a maximum of 12 inches still eliminates many Douglas Fir trees but leaves all fire-resistant trees remaining to keep the forest canopy at least somewhat in-tact. It will still certainly open the canopy and allow more sun-needing Ponderosa Pine trees to grow, especially if there is planting of ponderosa seedlings in the thinned area that I suggest.

Also, why are you so concerned about a more even-aged stand over time when you have no idea what this stand will actually do over time? What we MUST think about here is, first and foremost, is keeping as many trees as possible because we NEED every tree possible to sequester as much carbon as possible. Bigger trees sequester more carbon than smaller trees, and sequestering carbon should be first and foremost in your thoughts, as we (and our forests) may not have a long-term future if this is not done. For every tree you cut down, you are stopping oxygen from being produced and producing massive amounts of carbon in your logging operations.

Not only that, the biggest concern that you state is for communities to be safe from wildfire, and for forests to be able to survive wildfire. The alternative above does all of that, by thinning all trees that are a upper limit of 12 inches in diameter, limbing those left to a minimum of 20 feet above the forest floor and prescribed burning at least every 5-7 years will do this! As I have stated above, there are few Douglas Fir trees above that limit so you will be creating a forest that is more open, allowing for wildlife habitat because the ground is much, much less disturbed by logging machinery. As far as climate change is concerned, you will be leaving not only fire-resistant trees but also trees that have withstood drought conditions over time and have the age and strength to continue to do so.

I have watched many a logging truck roll down Interstate 5 towards Hampton Lumber and other lumber mills and I have noticed that at least 80% of the visible log piles there are of logs that are 12 inches or less in diameter. Many, many lumber mills in North Central, Northwestern and Northeastern Washington, including Hampton Lumber have become accustomed to much smaller logs, and therefore would still be able to have a commercial harvest with the alternative that I suggest above.

All of your reasons for rejecting the alternative stated above are absolutely false. By reducing the limit to 12 inches DBH regardless of species, limbing remaining trees to a minimum of 20 feet off of the forest floor and initial prescribed burning of each site, followed by continued monitoring of the site for prescribed burning needs, which would likely be at a 10-15 year interval can work and will provide you with every aspect you deem important in Needs #1,2 and 4. You must stop cutting down large diameter Douglas Fir Trees, and destroying all remaining landscape with heavy machinery. Your work on upper Buttermilk Road has created a ruinous landscape that will take many, many decades to recover from.

Lastly. You must have the contracted work done monitored by an independent, unbiased third party who will make sure that the contractor stays within the project scope. You must not have the contracted work monitored by Michael Borowski, or any other member of the Forest Service Collaborative for this project.

Please, please listen to what I have to say. This is my forest just as much as it is yours.

Thank you,

Tamar Baber