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Organization:

Title:

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United States Forest Service  
Methow Valley Ranger District

I write as a professional outdoor action sports athlete, who holds degrees in Environmental Studies and Outdoor Recreation. I am currently red carded as an engine boss on a local wildland fire fighting crew. I grew up at Second Mile Ranch on Poorman Creek and represent our Community, which has been here for over fifty years. We have three generations living on the ranch. We live here because of the peace, and connection to our natural surroundings, and we hold the principle of working with each other to find common ground and living with nature in the highest regard.

We appreciate the opportunity to comment on the draft EA for the Midnight Project up Twisp River. Our first concern is that providing 30 days is an unreasonable amount of time to read, digest, and comment on the document, especially given the length of it and the complexity of the proposed project.

Management of the Twisp River Watershed via the profusion of federal funds at your (our) disposal, presents an excellent opportunity to shape the health of our forests for generations to come, and be a leader in ecology based forestry.

Unfortunately, the local Ranger District wants to reduce wildfire risk using old school, commercial logging practices. What the forest and the people who love it need, is innovative holistic science-based solutions that respects nature as the bottom line.

What we have seen on the ground with the Forest Service's Mission Project does not give us faith that the Midnight project will be responsibly managed with a light hand with the overall quality of our natural environment as a key concern. The nearclearcuts, slash, and compacted ground leave a depressing forest that's an eyesore, and an affront to science-based principles with respect to fire risk reduction.

What we are left with is no longer a thriving, diverse forest, but a machine logged landscape with little species variability, and a forest canopy that will only ensure overgrowth of brush flashy fuels, and stumps, along with machine piles that will be nearly impossible to burn.

This is unacceptable. It heavily impacts our way of life and our prime economic driver, low-impact outdoor recreation. People do not come to the Methow to see a loggedover landscape, and the residents despise it. Our entire Twisp Watershed should not be treated with such heavy-handed disrespect. Most of the landscape within the project areas on Buttermilk and Libby Creek look denuded.

We have followed the proper Forest Service procedures by attending the rare Zoom and in person public meetings. We have commented and later objected to the Twisp Project, which would log right at our back yard. We do not feel our voices were heard,

and the project was pushed ahead with not even one of our objections implemented. This diminishes the trust we should have in the Forest Service to implement responsible fuels reduction.

Unfortunately, the Mission Project was pushed through with little concern for the many local residents whose lifestyle, water supply, scenery, and natural ambiance are impacted. We are far more afraid of these logging projects than the projected fire danger.

Now, how are we to trust local agency leaders to follow through with proper disposal of slash, and complete the post logging clean up? Federal funding for cleanup and prescription burning is not guaranteed. We note that last summer, one of our most cherished and visited campgrounds, Black Pine Lake, was not taken care of except for the cutting and removal of large "hazard trees". We personally piled dead and down forest litter and cleaned up the campground to improve the atmosphere, and decrease fire danger. Why is there money to log our campgrounds, but none to maintain them?

We feel these projects are being fast tracked using the fear of wildfire as the catalyst to enable commercial logging of medium and large diameter trees, seemingly returning to industrial-scale logging that caused the decline of all species that depend on old growth habitat.

If the primary goal of Midnight is to reduce the risk to the community of fire, can you show what the plan is for long-term stand management post logging? The Midnight DEA does not prescribe future activities post-project, allowing wildfire to resume its natural role, or show what interval fire will be reintroduce. We wonder where the actions proposed in Midnight have been proven effective?

Cutting medium to large fire-resistant trees in the name of fire protection is an insult to our understanding of how a natural ecosystem works with fire. It opens the canopy, lowering humidity returns and exacerbating wild fire potential.

The Forest Service phrase that we heard on public field trips with respect to the supposedly imminent catastrophic wildfire is, "it's not if, it's when." By what rationale can the Forest Service predict wildfires?

What we would like to see:

Logging and true thinning of crowded, small-diameter trees, is what we would like to see, with manageable hand piling and broadcast burning. To fashion these projects with a blunt instrument instead of precise technical practices is unacceptable.

By no means should the project temporarily suspend the Roadless Area Rule and the Northwest Forest Plan, especially with the allowance of cutting big trees. There's no legal precedent for suspending rules without due process and should not occur under any circumstances. If you must "suspend" these rules, then the rules could be easily violated.

- No to cutting large trees In LSR
- Trees to be removed need to be marked by agency personnel
- No to conditioned based management.

- No trees over 15" in diameter should be removed.
- Any tree deemed diseased or with mistletoe needs to be documented with photographs, reviewed and marked prior to the commencement of cutting.
- No to Matrix shaded fuel break- there is no scientific justification for cutting more medium to large trees along the roads to create a shaded fuel break. Why is it even called "shaded" when the forest canopy will be significantly opened, creating more sunlight, lowering humidity, and drying ground fuels, contributing to drought.
- No to machine piling- These piles are well documented across our landscape and are jackpots in a wild fire scenario.
- No to machine made fire lines which will leave scars on landscape and encourage atv, and driving off road use, further contributing to erosion.

It is time for a progressive, present day fuels reduction plan that has our natural ecosystem's native structure as the prime intent of the project.

Having only 2 choices for fuels reduction activities in the EA is insufficient. The public has only the choice of either agreeing with the Midnight Plan, or doing nothing.

Recommendations to be considered:

Award contracts only to logging companies that have a proven track record of responsible practices.

The contracted, ecologically based thinning will be funded by appropriations from congress, the contractor will not be paid with trees. Deck the logs and have the mills bid on the log decks. Have a clear plan for cleanup post logging and a prescribed burn plan that has been tested in similar vegetation and soil and slope types to show the plan's validity.

Our bottom line:

We don't agree with using our precious Twisp River Watershed as a test plot based on a flawed hypothesis with a flimsy environmental assessment that is farmed out to subcontractors who have no tie to our community or natural landscape. The value of our natural resource is worth so much more than that.

Weigh the net worth of logging of 69,000 board feet that is projected from the midnight timber sale and who benefits, to what sustainable outdoor recreation will bring many of its valley residents. 25% of The Valleys income is derived from outdoor recreation, with the projection of users growing steadily. Besides making bigger parking spaces for trail hikes, we don't see how these projects factor in the significant impact it will have on outdoor recreation.

The Final EA for Midnight must conclude a finding of significant impact, thus requiring an EIS. Our precious, life giving Twisp River Watershed deserves it.

Creating positive awareness:

With complete transparency, I am happy to share with you a film we have co-produced called, Our Backyard. It is circulating world wide, and helps bring about awareness to these FS projects which are in the process of impacting nearly 200,000 acres across our beloved valley.

Were happy to say our film has had thousands of views on social media, and we now have it available on You Tube.

Please enjoy watching Our Backyard

<https://www.youtube.com/watch?v=-C1H6wrbAso&t=2s>

Sincerely,

Michael "bird" Shaffer

On behalf of our Second Mile Ranch Community.