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Organization:

Title:

Comments: My Midnight Project Comments:

I am commenting on the Midnight "restoration" project because I am really opposed to the way it is being handled and what you, the FS plan to do. I live four miles up Twisp River Canyon and are as concerned about protecting my property from fire as anyone, but what the Forest Service has planned brings no comfort whatsoever.

My first issue with this project and all of the so-called science behind it is that you are only using the science that agrees with what you want to do. You say that the forest in this project area has become too dense and fire prone, and you need to bring it back to historical levels. But you don't know what historical levels were 200-300 years ago, only what it looked like after logging started 150 years ago. There is current scientific information that supports the fact that these forests were, in fact very dense before they were logged and were mixed conifer forests. If a particular stand is very dense, it is because that location is naturally capable of supporting that much biomass. Look at these studies, not just studies that support the logging that you want to do.

As Chad Hanson, author of the book Smokescreen, states: "The most troubling aspect of the overgrown forest narrative is that it diverts attention from the fact that today's forests have much less carbon than they naturally did before many decades of intensive logging- far less carbon than they could store if we dramatically increased forest protection to draw down the catastrophically excessive levels of CO2 in our atmosphere. "

Fire is as much a part of the forest ecosystem as any other part, and we humans are the ones who MUST learn to live with fire, instead of trying to fight it and limit it. When a forest fire happens, it creates a different kind of ecosystem- a snag forest ecosystem which is hugely important to the general forest health. At times, the highest level of plant species' richness has been found in high-intensity fire patches- more than in lower-intensity fires areas or adjacent unburned old forest.

Fire is already doing the job you want to do with logging, as evidenced by the Crescent Mountain (2018) and Cedar Creek (2021) fires. Despite burning in the neat of mid/late summer, most of these two mostly-wilderness fires do not appear to have crowned out. However, the Cub2 fire was in mostly previously logged land, and it experienced far more crowning.

Did you know that Current forests in the western United States have much less snag forest habitat from both high-intensity fire and cycles of drought-than they did before fire suppression and logging began. There is only about 1/3 as much snag forest habitat in today's forests compared with historical forests inhabited by black-backed woodpeckers, according to Chad Hanson's research work on these forests.

We NEED fire-adapted human landscapes instead of massive logging projects, so that humans and their dwellings learn to keep their properties and towns fire-wise, and nature can keep the ecosystem that it desperately needs and that we are destroying.

I am adamantly against the Matrix/Commercial aspect of this project and insist that you take all commercial logging out of this project. There is nothing restorative about commercial matrix thinning- leaving only Pine trees about 100 feet apart in what once was a mixed conifer forest. I have seen this destruction firsthand in the Mission Logging Project. You will absolutely ruin the forest ecosystem for centuries, and actually make climate change worse if you allow for commercial Matrix thinning. Regardless of a tree's condition or inhabitants (bugs or beetles), All trees over 12 inches in diameter MUST be kept in the forest, as these are fire resistant trees and even if some of them die, they provide food (bugs) and habitat for birds and other creatures and keep the ecosystem in balance. What you want to do is destroy that ecosystem.

Also, when you consider what Matrix thinning removes in terms of carbon storage, compared to what a fire may have done in the same area, the percentage of carbon storage loss is much greater in the thinning project than what would be there even if that whole stand burned, which it rarely does.

I request the following:

- 1.Take out ALL commercial thinning from the project and remove ONLY trees 12 inches or less from the landscape, regardless of health. You refer to the concern of "crown fires" but crown fires are extremely rare,

according to Former District Ranger Mike Liu.

2. You must stop the "designation by prescription" style of logging and return to a "leave-tree- marked" style of hand cutting. Prescription style of logging gives much, much too much leverage to the contractor to make their own judgement on the trees to be removed and has in the past caused much more conifers to be removed than what was originally stated in the prescription. I saw this first-hand in the Mission Project and will do everything in my power not to see a treatment area that looks like that again in any project.

3. There must be an independent, third party of people who represent a broad spectrum of community interests and the monitoring must be done prior to and during the implementation, not after any cutting has been done.

4. The Methow Valley is not a logging community. You state a need for a local economic value of the Midnight Project, but the only economic value will come to one logging contractor, doing the work to export logs over 1 to 2 mountain ranges to lumber mills such as Hampton that are over 100 miles from the site. The one local logging company might employ 8-10 people, which it already does. There will be no increase in recreational income for the towns of the Methow Valley. But what about the economic cost to this project? This should be strongly considered, with logging trucks driving Twisp River Road and Hwy 20 putting more local diesel emissions into the air, disrupting recreational use from general logging operations and long-term degradation of natural forest conditions favored by campers, hikers, and bikers.

Remember, these forest lands are OUR lands just as much as they are of the Forest Service, and we have the right to protect them from the devastation that the FS projects want to inflict on them. Stop making wildfires the bad guy and start spending money instead on fire-hardening homes and towns.

Thank you,

Tamar Baber