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Comments: Cynthia Sandeno Acting Forest Supervisor, Okanogan-Wenatchee National Forest Comments related to the Midnight Restoration Project 63933

Dear Acting Supervisor Sandeno: I would first like to object to the labeling of this project as a forest restoration project. No one knows except the indigenous peoples that lived in the Methow Valley for thousands of years what the state of the local forests were in until they were overrun by white settlers. Unless there has been extensive communication with the remnants of the local tribes and discussions regarding the state of the forests based on tribal spoken histories, you don't have even anecdotal data to verify any justifications for determining what restoration is. Even then, we can never know the historical conditions that existed. To claim that this project will restore the forests to some previous state that the experts think will reduce fire danger is ludicrous. These forests evolved for millennia with fire as a significant element that shaped them. Surely, there was never a time when fire didn't influence the evolution of these forests. We as humans need to learn to adapt to the earth and nature, not force nature to live up to our expectations or desires. The forest will continue to evolve based on the environment through time regardless of any actions taken by humans.

Upon review of the EA for this project, there are several concerns regarding the proposed amendments to the Forest Plan Forest Wide Standards and guidelines. Amending Forest Plan S & G Forestwide 17-8 is stated as necessary to "provide for economic viability of timber sale operations on up to approximately 3,245 acres that are accessed by these roads. Thinning treatments are proposed to maintain and enhance forest vegetation structure and arrangement, increase ecological sustainability to disturbances such as insects and disease, wildfire, and climate change, and reduce wildfire hazard in the Wildland Urban Interface." Given the distance from adjacent private lands and any reasonable definition of "Wildland Urban Interface", the use of this reasoning is specious and questionable. The excuse that the proposed work will offer any substantial reduction of wildfire hazard to the WUI is misleading and inaccurate given that the area described for this amendment has already burned in 2018 and does not qualify under the definition as described by the USFS: " WUI is an area within or adjacent to an "at-risk community" (see below for the definition of an "at risk community") that is identified in recommendations to the Secretary of Agriculture in a Community Wildfire Protection Plan, or A WUI is any area for which a Community Wildfire Protection Plan is not in effect, but is within ½ mile of the boundary of an "at risk community". A WUI is also any area that is within 1 ½ miles of an "at risk community" AND has sustained steep slopes that may affect wildfire behavior, or has a geographic feature that aids in creating an effective fuel break, or is in fuel condition class 3. (An area classified as fuel condition class 3 implies that the current condition of the vegetation within the area would not be sustainable due to the absence of two or more natural fire cycles. In other words, an excess of vegetation and fuels has occurred due to the exclusion of fire which naturally reduces the level of forest fuels.) Given the Crescent Mountain Fire of 2018 and its extreme reduction of fuels in the described area, further fuels reduction as proposed is absurd and nonfactual. "At risk communities" are areas where conditions are conducive to a large scale wildland fire disturbance event, thereby posing a significant threat to human life or property. The areas adjacent to the 2018 Crescent Fire are not currently at risk or conducive to a large scale wildland fire. These areas should not be thinned or logged.

As a landowner up the Twisp River, I've spent the last 45 years traipsing these lands and recognize that there are places that are overgrown with dog hair thickets that do need thinning to reduce the severity of any wildland fires in the area. I have rarely seen trees more than 36"dbh and stand in awe that they are still on the land. Most of the larger trees are remnants left over from previous logging operations and have survived a few fires due to their age and fire resistance. I agree that reducing these thickets will enhance the fire resistance of the forest in general. The proposed logging operations are in the vicinity of existing roads which is not the prime areas which are in need of thinning and cutting larger trees will not reduce the severity of wildland fires. The work that is needed are best thinned by hand crews well off the existing roads on slopes and benches not easily accessible to machinery. The Midnight project is poorly designed to remove larger trees along accessible routes

which have already been logged in the past and resulted in overgrowth of the understory exacerbating the risk of increasing the severity of wildfire. The trees that need thinning are not "commercial"' timber.

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Additionally, the impact upon winter recreation of plowing both the north and south side roads along the Twisp River will be negative. The Twisp River is utilized by both snowmobilers and skiers for winter recreation. Often when the valley floor has little snow, the Twisp River corridor has enough snow to be an alternate to driving up to the Loup South Summit. If climate change is a consideration for the actions proposed in the Midnight Restoration Project, then reducing carbon emissions by all means should be a consideration of the methods and processes in this restoration project. This holds true for the emissions released by all the machinery and trucks involved in this project. It would seem reasonable to estimate the tons of carbon dioxide that will be emitted while pursuing this project to better understand if this project will have a negative effect on one of the criteria mentioned as a rationale for this project. The Climate Report in this EA states:" To calculate an accurate estimate of GHG emissions from project activities, records of fuel usage would need to be maintained. The largest emissions from these project activities are expected to come from the use of heavy-duty vehicles, excavators, dozers, and helicopters. However, these emissions are expected to be minor in relation to the overall project long term carbon reductions.

The relatively small quantity of carbon released to the atmosphere and the short-term nature of the effect of the Proposed Action on the forest ecosystem are justified, given the overall change in condition increases the resistance to wildfire, drought, insects and disease, or a combination of disturbance types that can reduce carbon storage and alter ecosystem functions (Millar et al., 2007; D'Amato et al., 2011)."

This is not a rational analysis of the proposed GHG emissions from the current forest compared with the estimated GHG emissions from the project actions. The premises on which the decisions related to this project are made are faulty since many of the premises are based on estimates of anticipated results without the data to indicate such conclusions are valid. I believe this is a misguided attempt to do something to allay many people's fears of wildfire. There are better ways to prepare our forests and other public lands for the anticipated impacts of climate change where water will be of primary interest. Removing forests reduces the water storage capacity of the soils and impacts the speed of runoff thereby affecting the downstream flows and aquafers.

I fully support the NCCC's Methow Community Alternative and do not support the decision contained in the EA Draft.

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