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Title:
Comments: Maggie Coon comment on Midnight Project
May 14, 2024

Thank you for the opportunity to comment on the Midnight Project.

I write as a 50 year resident of the Methow Valley and someone who has derived countless hours of enjoyment on National Forest lands in the Methow Valley. In the summer of 1976, I was privileged to serve as Backcountry Ranger on the Lake Chelan Sawtooth Backcountry and was extremely pleased to see a large portion of this area officially designated as wilderness in the Washington Wilderness Act of 1984. These lands lie immediately adjacent to the Midnight Project and I hold a keen interest in their future.

When I first knew this area 50 years ago, much of the Okanogan National Forest (now Okanogan/Wenatchee N.F.) had very significant wilderness characteristics. Today, many very ecologically important features remain, including areas of designated late successional reserve. The lands included in the Midnight proposal are habitat for wolves, lynx, fisher, moose, mule deer, mountain goats and this part of the upper Twisp River is a federally recognized recovery area for Bull Trout, spring run Chinook and steelhead. Any actions in the area should not jeopardize literally millions of dollars of investment in salmon recovery in the overall watershed.

The Midnight Project EA refers at length to restoration objectives and some proposed actions are appropriate toward that end. For example, I support:

- Use of very careful and well timed prescribed burning

- Decommissioning of roads throughout the project area

- Non commercial thinning of small diameter trees

- Actions taken where feasible during winter months to minimize soil disturbance, while remaining sensitive to wildlife impacts.

Overall, however, I am deeply concerned that commercial logging objectives predominate in this proposal. Given the availability of funding for true restoration, logging with an economic incentive is unsupportable. Also, actions which will dramatically alter the landscape for the very long term should not be taken.

Specifically:

- To restore old forests on the Midnight Project, all large trees over 20.9" in diameter should be kept.

- I request that the Forest Service drop all exceptions for cutting large trees especially in the Late-Successional Reserves.

- I request that forest management actions be conducted by the marking of trees, rather than "condition based management." The public deserves a transparent approach and to know that prescriptions are being followed.

- Logging should not be allowed on steep slopes because it is in conflict with restoration. Economics should not

justify such action.

- I ask that the Forest Service reevaluate and reduce the proposed extensive use of linear fuel breaks and machine fire lines. These approaches will leave long term scars on the landscape, detracting from both ecological integrity and aesthetic qualities.

As stewards of vast areas of land in the Methow Valley, the U.S. Forest Service is entrusted by our community with a huge responsibility. We ask that you ensure that actions taken in the Midnight Project comport with the central idea included in your agency's mission statement:

"Advocating a conservation ethic in promoting the health, productivity, diversity, and beauty of forests and associated lands"

Thank you for your consideration,

Maggie B. Coon, Twisp River