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Title: Chairperson
Comments: I am writing on behalf of the Olympic Environmental Council (OEC) as Board Chair. OEC has participated in educational activities to ensure the protection of forest resources among all the natural resources of the Olympic peninsula. OEC participated in the collaborative development through the 1990s of the "Fish and Forest Plan" in order to protect All remaining old growth and late successional reserves across the Pacific Northwest and therefore have status to comment on the "Midnight" proposal and EA as it blatantly proposes to circumvent the tenants of that Forest Plan:
The proposed harvest element is clearly a timber logging operation without science to support recovery of "historic" conditions especially soil characteristics, ground cover, water retention, ground dwelling amphibians, birds, insect, epiphyte populations critical to future forest recovery and carbon storage. And yet it also creates a fiction of a desired "future" condition across a vast area of unique mountainous microclimates of differing elevation and aspect.

The proposal is clearly an Experimental action not allowed at this scale due to lack of evidence and pre-planned and FUNDED post harvest monitoring. By using Condition Based Management any predictability and certainty of future outcome is lost .

CBM has been explained in numerous field trips by local USFS staff to encompass a range of actions that are NOT quantifiable in result. NO dedicated units to be marked, no leave tree marking and no quantity measured for removal as all action is based in the "moment" on the personal choice of an individual manager and the logging contractor/operator. Ranger Fur has admitted in public conversation that the previous harvest operation on Buttermilk and Libby Creeks "didn't turn out as expected". What does that mean for his responsibility to determine future conditions in and area he little expertise ,. This is Hubris.

The determination that older trees up to 20 to 25 inch DBH and most Douglas fir trees "may need" to be removed to reduce severe fire is not based on the resilience of bark thickness common in trees over 10 inches. There is no certainty of any stated desired outcome, therefore the proposal EXPERIMENTAL and oxymoronic at best. Kill the patient to cure a disease. Maybe even a disease the forest is not suffering from. Historic conditions are not settled science at this point.

In including this area in the WEstside forest plan, its been assumed in the past to be predominately west side conditions with restrictions per the Forest Plan, therefore Douglas fir trees must be retained as trees naturally dominant esp on north slopes. Conversely, if the USFS assumes this is "historically" open ponderosa over story then shouldn't the required "Eastside Screens" by used to limit harvest of larger diameter trees of any species?

The size and scale of this proposal must be considered alongside the adjoining actions. Calling it a national "fire shed" does not preclude the NEPA requirements to evaluate the impacts of multiple alternatives to the entire scale of contiguous activity.

The proposal should not allow incursion into Late Successional Reserves as this sets an unnecessary and unproven elimination of actual desired future condition that allows the formation of protected old growth as intended since 1994. The goal was to curtail loss of older carbon storage, moisture retaining forests necessary for the protection of all life.

My comments are backed by my family's history in the commercial salmon fishery for over 40 years, including professional participation in habitat recovery on both the Methow watershed and the Olympic Peninsula. We are personally affected due to loss of income from fish harvest reduction. Detrimental impacts of timber harvest on

this scale are known causes of ecosystem impairment and habitat loss . The scale of this proposal will not allow RESTORATION of actual riparian or upland habitat sediment control and water retention in any foreseeable future.

Despite the unfounded claims in the EA of forest restoration, the damage to this watershed over the extensive harvest period will increase the potential of extinction of Chinook salmon. These factors must be evaluated in a multiple alternative analysis through a NEPA ENVIRONMENTAL IMPACT STATEMENT rather than this abrupt and dismissive EA.

Is it fire safety? Is It forest restoration? It's it a timber grab? This proposal is aimed squarely at defeating the purpose of the Forest Planning process created while these current USFS employees were in elementary school. USFS can do better to protect out future with less timber removal and more smaller restoration actions.