Data Submitted (UTC 11): 3/13/2025 4:00:00 AM
First name: Jeffrey
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Organization: Hungry Mtn Ranch
Title: Owner-Operator 53 years
Comments: Along with my wife, we own and have operated a ranch with responsibly managed forest lands on a second order tributary of the Methow River and have observed first hand the effects of USFS management in our adjacent USFS watershed for the last 53 continuous years. We are also the holders of the adjudicated first class water rights in that watershed with a priority date of 1891. The ranch has been continuously irrigated since 1891 and the soils are all classified by the NRCS as "rare and unique".

The watershed is located in a steep and narrow valley lying between 2400ft and approximately 4000ft elevation. The soils in the watershed 50 years ago contained less than two percent organic matter. After decades of continuous "prescriptive burning" which included year after year of widespread fires being ignited with helicopter based incendiaries and human sources of ignition, we are now left with a forest that no longer has the ability to retain the winter snow pack as it once did.

The adverse results of direct USFS prescribed burning policy in our watershed are fourfold:

1. In the spring when the watershed is waking up from a long winter, the USFS prescribed burning

has severely reduced the quality of the soils and the quality of life of all the residents in the tributary by inundating the valley with severe smoke, sometimes for weeks on end. As you should know, all smoke is carcinogenic and results in severe, adverse consequences to all human life. This is a scientific fact supported by the Federal Governments Surgeon General.

2. The result of burning in our steep watershed has resulted in the Creek running on top of the surface for the entire distance from it's watershed origins all the way to the Methow River, year round. This is contrary to the historic nature of the creek which would naturally flow and then go underground through several areas of the Creek riparian areas as it made it's way to the Methow River. This has been directly observed as a result of the fragile watershed soils having less organic matter now as a result of prescriptive burning in our steep watershed. The inability of the watershed to release moisture in a slow and natural fashion is a direct result of the soils having reduced organic matter from USFS prescribed burning. The Creek now discharges at a higher CFS in the Spring and early Summer which results in higher velocities and high erosion rates in all the riparian areas.

3. The prescribed burning activities in our steep watershed have resulted in placing a financial burden on our responsible management of our soils. In the steepest gradient areas we have been forced to react to the increased water velocities which are relentlessly resulting in erosion of our "rare and unique" soils by installing stepped mini dams in the Creek. While this has tremendously helped, we are not financially able to treat the entire watershed which runs for over a mile through our property.

4. Because of higher volumes of water being released in the Spring we are unable for weeks to initiate irrigating because the water is now permeated with eroded soils which have a detrimental effect by severely accelerating wear on our centrifugal pumps.

We urge you to more closely examine the resources you are supposedly treating in a scientific and good soil husbandry manner and confirm with continual soil testing and visual observation to ascertain that you are really achieving results that are beneficial to all the critical aspect of good, steep riparian habitat, not just the population/acre of standing timber. High erosion and CO_2 releases as a result of prescribed burning are detrimental to the long term management of our steep watersheds, soils, our health and lively hood, not to mention the harm to fish and reservoirs filling with sediment that reduces our ability to generate clean and

inexpensive hydropower.

While prescriptive burning may have some beneficial benefits for flat lands, it has no place in steep watersheds for all the reason I have just related as a direct observer in our steep watershed. Please reconsider that you have taken a wrong turn in applying one treatment for all situations. It is blatantly apparent to me that you are not using Best Management Practices for all the elements of good watershed management, but instead are solely focused only on the timber.