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Comments: I am writing to object to the planned commercial logging planned under the "Midnight" project in the Twisp River Watershed and the "Upper Methow" project in the Goat Creek Drainage in the Methow Valley, Okanogan County, WA. Scientific studies show that logging on forest service lands more than ½ mile from communities is not an effective method of improving community fire safety. These type of logging operations:
*Leave stumps, skid roads, and logging slash
*Open the forest canopy, drying ground fuels and warming groundwater
*Increase the wind velocity, making fires burns faster and hotter (thus traveling faster towards communities making evacuation more difficult)
*Fracture fish and wildlife habitat, degrade scenic quality (which is highly important to Methow's recreation-based economy), and reduce carbon storage

We should not be spending our tax dollars on subsidizing the logging industry. These tax dollars should be used to implement actions that have been proven to reduce wildfire risk to homes and communities adjacent to forest service lands. In particular, fuels reduction work should be non-commercial projects where the contractors have no incentive to remove large trees. Active forest management projects for fuels reduction should prioritize:

*The wildland-urban interface roughly ½ mile from homes and communities
*Reduction of dense stands of small-diameter timber; intensive treatment of ground fuels via limbing of trees, prescribed burning, and other ecologically-friendly fuels reduction; and maintaining fire-resistant trees
*Preservation of medium/large trees (over 10 inches in diameter) and maintaining biodiversity and ecosystem function
*Preservation of existing roadless areas (new roads are expensive to build, maintain, and decommission; they fragment habitat; and provide human access which can increase wildfire risk and spread of invasive species)

Furthermore, the forest service should develop an improved fire prevention plan and increase enforcement of fire restrictions during times of high fire danger to reduce the frequency of human-caused fires. Studies have shown that 84% of wildfires are human caused. Federal funding should also be provided to help local homeowners make their homes and property more fire resistant and to help local communities improve firefighting infrastructure and evacuation systems.

All federally-funded fuels reduction projects should be developed via a democratic process where all people and organizations have an opportunity to present ideas and concerns. These projects should also consider multiple alternatives for fuels reduction and present diverse management options, like those listed above. Finally, most importantly these projects should comply with existing federal laws and consider pertinent peer-reviewed scientific research.