

Responsible Official: Michael Williams, Forest Supervisor, Okanogan-Wenatchee National Forest

Comments by Dr. D.W. Johnson, Fisheries Scientist and Retired Professor of Biology (B.S. Wildlife Conservation, Washington State U. 1958; Ph.D. Zoology, Arizona State U. 1969) on

Draft Decision Notice and Finding of No Significant Impact Mission Restoration Project and Forest Plan Amendment #59 April 2018

Date submitted (UTC-11): April 23, 2018

Submitted by: Dr. Donald W. Johnson, Fisheries Professional Emeritus

Organization: Libby Creek Watershed Association

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Comments:

ATTN: objection reviewing officer

Below you will find my objection to the EA and draft DN for the Mission Restoration project.

Required 36 CFR ? 218.8(d) Objection Information

Proposed Project Name: Mission Restoration project

Name and Title of the Responsible Official: Michael Williams, Forest Supervisor

Proposed Project will be Implemented on: Methow Valley Ranger District, Okanogan-Wenatchee Forest

I have submitted comments on the pre-decisional EA for the proposed project on February 20, 2017 and on the Revised Preliminary MRPEA on July 26, 2017.

I include below statements from the Draft Decision Notice and Finding of No Significant Impact Mission Restoration Project and Forest Plan Amendment #59 followed by my comments in red within brackets. Those comments should be taken into consideration and questions dealt with before the Final Decision Notice and Finding of No Significant Impact Mission Restoration Project and Forest Plan Amendment #59 is issued with a refusal to move on with an essential Environmental Impact Statement.

I find the following sections of particular importance and significant to the need to object to this decision and the conclusion that no environmental impact statement (EIS) is needed:

"I have determined that the Mission Restoration Project, Alternative 2, is not a major federal action, individually or cumulatively, that will have a significant effect on the quality of the human environment." [This suggests the MRP area within the National Forest and the public resources those watersheds contain may not be within a "human environment" that Ranger Liu, as "the responsible official" has the duty to protect from adverse affects. I support the objection that the proposed Mission Restoration timber sale is not a restoration project that follows as submitted by Dick Artley and which partially documents my contentions. That objector asked the Responsible Official "to assure the timber sale name does not include the words "restore" or "restoration." Also wherever the NEPA document tells the public a natural resource will be restored and include the basis (with science references) for that conclusion. This wasn't done. Multiple independently authored science papers presented by this objector clearly described how commercial logging activity is the antithesis of forest restoration. The USDA Agriculture Office of Inspector General says: "We concluded that commercial timber sales do not meet the criteria for forest restoration." (Pg. 11) Long, Richard D., U.S. Department of Agriculture Office of Inspector General "Western Region Audit Report: Forest Service National Fire Plan Implementation" Report No. 08601-26-SF, November 2001. <http://www.usda.gov/oig/webdocs/08601-26-SF.pdf> Therefore, the final EA violates the following: 18 USC ? 1519. Destruction, alteration, or falsification of records in Federal investigations and bankruptcy, because the Responsible Official has consciously falsified the Mission NEPA document with the intent to influence the proper administration of the Okanogan-Wenatchee National Forest. 40 CFR ? 1500.1(b) because actions were not taken to protect, restore, and enhance the environment, and 40 CFR 1500.2(f) because **actions were not taken to avoid or minimize any possible adverse effects of their actions on the quality of the human environment.** 18 U.S.C. ? 1001 (a)(3) because the Responsible Official knowingly and willfully "relied on false writing or document" inconsistent with the science conclusions of scores of independent Ph.D. scientists "knowing the same to contain any materially false, fictitious, or fraudulent statement or entry." Knowingly falsifying the project's effects to the environment will give the Responsible Official an excuse to ignore the damage and not prescribe mitigation to reduce the adverse effects. 18 U.S.C. ? 1519 because the Responsible Official knowingly made false

entries in this draft EA with the intent to influence the proper administration of the Okanogan-Wenatchee National Forest. The Administrative Procedures Act directs judges to set aside an agency action if the court determines that the action is "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law." 5 U.S.C. ? 706(2)(A).

How this objection point can be resolved: Comply with the objector's request above."]

"As a result, no environmental impact statement (EIS) is needed. This determination is based on analysis of the context and intensity of the environmental effects, including the following factors, which are not in any particular order. Context The context of the environmental effects is based on the environmental analysis in this EA. **This project is a site-specific action that by itself does not have international, national, region-wide, or statewide importance.**" [Amendments "were not supported by the majority of commenters because they felt that the standards and guidelines within the Okanogan National Forest LMRP were placed there to protect important resources". Those comments cannot be ignored. The MRP is within a National Forest and the public affected by management of its resources is of statewide, regional, and national importance. This is especially important because the affected area contains critical habitat of fish and wildlife listed under and protected by the Endangered Species Act, a law passed by our National Congress. See this letter:

Dear Ranger Liu,

I did Forest Watch work for many years as a member of Tonasket Forest Watch. With my partners, I scaled many hillsides, walked many creeks and discovered what good forestry looks like, as well as bad.

I understand the appetite for timber, but once it is off the ground, it doesn't easily come back. Once the structure of the forest is changed it is pretty much on its own to come back, unless a lot of money is spent on reforestation, which doesn't work very well and is rarely fully financed.

Reading about the Libby Creek Project makes me sad because I know there are endangered aquatic and terrestrial species whose habitat will be diminished by this timber sale as proposed.

I care about **the Libby Creek Watershed because it is part of our U.S. National Forest System**, a national treasure.

I therefore ask you to reconsider this sale and redesign your treatment of the watershed to emphasize conserving the forest community.

Thank you Ranger Liu, for considering my comments.

Geraldine Gillespie

Columbia River Bioregional Education Project

Oroville WA 98844]

"Water quality parameters specific to aquatic habitat that are most susceptible to change by thinning and prescribed fire treatments are turbidity, fine sediment, and

temperature. This project would not impact these parameters where the sampling locations exist." [The absence of sampling locations in "critical habitat" within the project area or near does not justify a conclusion of no impact. A collaborative Aquatic Assessment found cause for long-term adverse effects to critical ESA-listed salmonids within the project area. An EIS should be conducted with sampling stations within the project area's critical habitat.]

"The effects of this project have been appropriately and thoroughly considered with an analysis that is responsive to concerns and issues raised by the public." [The Libby Creek Watershed Association membership must be considered an important part of that public and their comments have been ignored.]

"The degree to which the proposed action affects public health or safety. There are limited health and safety hazards to Forest Service employees, permittees, and the general public (see Section 3.15.6, Public Health and Safety EA page 326). None are unusual or unique. Recreationists, home owners, hikers, and permittees could encounter logging traffic" [There is no recognition or concern for the safety of the publics mentioned here who have commented on the threat of loss of life when encountering log hauling trucks over snow and ice covered narrow roads during planned winter operations. This is a critical example of the Ranger Liu's failure to consider Libby Creek Watershed Association members numerous objections. An EIS should be conducted with specific consideration of winter time users of project area roads.]

"The degree to which the effects on the quality of the human environment are likely to be highly controversial. The nature of potential effects on the human environment from the project actions is well established and not likely to be highly controversial." [All comments submitted by residents of Libby Creek and members of LCWA have been ignored. Their families lives and livelihoods are being threatened. The affected area contains critical habitat of fish and wildlife listed under and protected by the Endangered Species Act, a law passed by our National Congress. The MRP exposes those animals together with the human residents and other Forest users to adverse long-term effects. The lack of consideration of their comments should rise to the level of "highly controversial" and should be addressed in an EIS.]

Additionally I submit the following comments and conclusions:

"The 50,200 acre Mission Restoration Project is principally located in the Libby Creek and Buttermilk Creek drainages" [The descriptor "watersheds" should be used in an EIS; it is more positive and functional than "drainages" which suggests the elimination of a waste.] "including Smith Canyon, Elderberry Canyon, Ben Canyon, Chicamun Canyon, Mission Creek, Black Pine Creek, Yoyo Creek, Nickel Canyon, and Hornet Draw. The project area also includes a small portion of the Twisp River Watershed that was added at the request of adjacent private land owners to reduce wildfire hazards on National Forest System lands adjacent to the private lands." [Recognition of one group of citizens, while ignoring the concerns of the LCWA

members for their safety and other environmental values suggests an agency bias and an EIS should recognize and include concerns of all project area residents.]

"wildfire hazard reduction and transportation system management." "Interdisciplinary Team members to assess current conditions, determine needed changes, and evaluate effects of proposed treatments." [Commercial logging will result in using the Black Pine road above Libby Creek as a primary log haul route; that road is narrow, dangerous for other users and is currently sloughing into fisheries habitat. No plan has been disclosed for how this road will be stabilized and maintained for increased heavy loads. This must be addressed in an EIS.] "Since a recent decision had already been made regarding allotment management and monitoring controls are in place to protect resource values, **range management was considered outside the scope of this analysis and decision.**" [The DFEA deals with the MRP actions increasing forage above the streams and concluded that this would reduce cattle pressures on riparian habitat. That makes "range management" an important consideration within the scope of this analysis and decision and must be addressed in an EIS.]

"The Collaborative also provided funding and personnel for stand data verification (completed under the supervision of the District Silviculturist) and for a report on aquatic conditions, which took existing information and consolidated it into one report." [**One aquatic habitat report received and presented to the collaborative was not referred to in the DFEA; all available relevant reports should be considered without consolidation and deletions in an EIS.**]

"Decision & Rationale for the Decision" Alternative 2 "was **selected for implementation after consideration of** applicable laws, Forest Plan consistency, **environmental effects**, information in the Mission project file, **and public comments** received during the scoping, comment, and objection periods. My conclusion is based on **a review of the record that shows a thorough review of relevant scientific information**, a consideration of responsible opposing views, and **the acknowledgement of incomplete or unavailable information, scientific uncertainty, and risk.**" [**A thorough review of the record will show that all presentations of environmental effects (including the collaborative Aquatic report), public comments, and relevant scientific information that did not support the planned MRP were ignored. All relevant information must be considered in an EIS.**]

"Proposed commercial thinning and slash treatments is planned to be completed in **two Stewardship contracts**. The **first contract of commercial thinning treatments** with associated fuels treatments **will remove trees from the Libby Creek drainage, about 6 MMBF**. Much of this contract **will likely be winter harvested**. The second contract will remove trees from the **Buttermilk Creek** drainage, about 2 MMBF. Most of the units in this second contract could be harvested in either summer or winter." [**This MRP is named for a small tributary of Libby Creek to mislead the public regarding the extend of the project;**

it should be clearly designated as the 'Libby and Buttermilk Restoration Project or more reasonably listed separately as "Timber Sales" prior to an EIS.]

"Most harvest activities will use conventional tractor yarding systems, but up to 116 acres of cable yarding systems are proposed. It is important to remember that restoration takes time and that objectives might not be fully met immediately after the initial treatments." [The preceding statement is included to justify that only the commercial logging will be completed without additional public funding of "restoration" related actions. This should be clarified in an EIS.]

"forested ecosystems that are resilient to disturbance often include large, fire tolerant trees, which take many years to develop. Restoration activities are planned to set landscapes on successional trajectories that lead to desired future conditions. ,Additional underburning of treated areas is planned to take place about 15 years after the initial fuels treatments." [Commercial logging of larger "fire tolerant" trees is not supported by best forest ecology science as a method of facilitating succession for an increase of "large, fire tolerant" trees. In addition this commercial logging (MRP) is presented as causing "short-term" adverse habitat affects, but it includes plans for future treatments on a 15 year cycle. This provides a continuous interruption of any "successional trajectories" and should be clarified in an EIS.]

"My decision meets the requirements of the National Environmental Policy Act (NEPA) and follows management direction, except where amended for deer winter range by this decision." [Neither NEPA or the Forest Plan has allowances for exceptions that produce long-term adverse effects to critical fish and wildlife habitat. This should be clarified in an EIS] "The rationale for my decision is further discussed below and considers public comments and issues (EA pages 14–18) along with management objectives associated with:" "One non-significant Forest Plan amendment for deer winter range" [There has been no "best science" basis for a conclusion that removal of mule deer winter range cover is a "non-significant" Forest Plan amendment. Relevant "best science" should be included in an EIS.]

"My decision for selecting the Proposed Action involved balancing several considerations, including which alternative or combination of treatments best supports the purpose and need for action for the present and future generations, and the project objectives described in the Mission EA of protecting the wildland urban interface (WUI) from wildfire while at the same time maintaining healthy watersheds and effective wildlife habitat;" [These objectives should not conflict, but they do because the MRP in Libby Creek is not at the WUI and as a commercial logging operation it would result in long term adverse effects to a watershed not presently healthy by adding sediment, altering flows, and increasing water temperatures in critical fisheries habitat, as well as reducing currently protected mule deer winter cover. This must be clarified in an

EIS.] "protecting residual vegetation; providing for public health and safety; maintaining roads adequate for resource and recreation management needs for the present and for future generations" [These objectives would also not be met since logging hauls would be scheduled for narrow unstable roads in winter conditions that would be hazardous to public users. This should be analyzed in an EIS.] "while minimizing effects to aquatic habitats; minimizing adverse impacts to the grazing permittee;" [Using the term "minimizing" adverse effects acknowledges they would accompany and follow MRP actions and they would be long term as defined by the USFS. This is inconsistent with the decision to omit consideration of grazing and should be addressed in an EIS.] "and reducing the risk of increased invasive species populations." [This statement is incorrect since the road work and other commercial logging activity will create bare soil by removing ground cover and the increase in "transitional forage" will result in maintaining cattle grazing activity; both of these actions are listed in the EA as contributing to the past and current spreading of invasive plants. This must be further discussed in an EIS.]

"Travel analysis recommended decommissioning about 33 miles of National Forest System roads; **adopting 16 miles of roads that are currently non-system roads** during treatment activities; rehabilitating 12.1 miles of non-system roads found excess to the needs for future administrative or public access; replacing 8 culverts where fish barriers exist on fish-bearing streams and replacing 15 culverts where existing culverts are undersized in non-fish-bearing streams, applying rock to the road surface at stream crossings on up to 33 stream crossings (6 prior to haul and 27 **when funding is available**) replacing the West Fork Buttermilk Creek bridge **when funding is available**; and constructing an estimated 1.2 miles of temporary roads. **Pre-haul road maintenance and/or reconstruction activities are proposed for approximately 56 miles of road and will be completed prior to use of the roads for harvest activities.**" [**"Treatment activities" for several years are planned to consist primarily of those related to commercial logging and would result in adverse effects to public health and safety, fish and wildlife habitat, watershed function, and the spread of invasive species. Most "restoration" actions would be addressed "when funding is available". This should all be addressed in an EIS.]** "Road reconstruction activities will include the restoration of drainage features, slope stabilization, applying spot surfacing, and/or resurfacing with crushed aggregate, and pavement patching. In addition to road reconstruction work, other roads that will be used for timber haul will require pre-haul road maintenance, primarily blading and shaping of the roadbed and ditch, and brush removal." [**Currently closed roads with restored ground cover will be re-opened and a major haul road, Black Pine road, that is unstable and contributing sediment to Libby Creek will require extensive and continuing maintenance; it has a history of extended closures. This road work will be detrimental to critical aquatic habitat. In addition it must be noted that "restoration activities" will only be completed if or "when funding is available" from Congressional allocations. This also requires clarification in an EIS.]**

"Preferred Alternative (Alternative 2) will best meet the purpose and need described below and further described in the EA on pages 4 - 6. The purpose for action is to: 5 • Restore and maintain aquatic and hydrologic processes impacted by management, **improve habitat for Threatened and Endangered aquatic species, and increase watershed resiliency to existing and anticipated disturbances;**" [See above comments. The EIS should explain the difference between "minimized" adverse effects and "improved habitat".] "• Restore soil-related processes and **functions where past management practices have created detrimental effects;**" [Those past practices have been identified as logging, cattle grazing, and road management. How this will now be remedied must be included in an EIS] "• **Maintain and restore forest vegetation characteristics to within estimated historical and future ranges of variability**" [Those historical conditions have been referred to as pre-European and early 20th century and have not been reconciled with anticipated future conditions. That should be included in an EIS.] "to improve forest resiliency to insect, disease, and wildfire events; • **Develop, maintain, and/or enhance habitat for federally listed and other wildlife species**" [Reports submitted by Forest experts include evidence that supports **conclusions of adverse fish and wildlife habitat effects of commercial thinning (logging)**, not enhancement. That contradiction should be dealt with in an EIS.]

" • **Provide the road system needed for safe and efficient travel,** administration, public use, and protection of natural resources on National Forest System (NFS) lands, now and in the future." [Roads currently in this system that are planned to carry heavy loads of commercial logs are **unstable, have been frequently closed by slides, and deliver sediment to critical Libby Creek fishery habitat.** Their planned winter use when covered with snow and ice, will **threaten the safety of other public users. These concerns require EIS analysis.**] "There is a need for action because: • **Several roads currently add sediment,** increase the drainage network, block fish migration, and reduce woody debris recruitment in the project area. Large wood, spawning habitat, and/or pool habitat are currently below desired conditions for ESA listed fish species and in small headwater streams within the project area. In comparison to the desired condition, **some drier drainages have stands of conifers that shade out hardwoods and reduce the amount of water available for stream flow.**" [Commercial logging is planned for the drainage bottoms where the conifers provide shade to prolong snow melt increasing summer stream flows. An EIS should deal with this question.] "These conditions also make some riparian areas more susceptible to uncharacteristic harmful effects caused by wildfires. Road construction, conifer encroachment, and **past vegetation management practices have reduced water flow and wetland habitat.**" [Those past practices have been identified as logging, cattle grazing, and road management, which are extended in the MRP. An EIS should deal with these questions.] "• Soil compaction in the project area limits native plant growth, reduces soil biological activity and water infiltration, limits soil productivity, and reduces the

resiliency of plant communities to climatic and biological changes over time. • **Past management practices**, including fire suppression, changed forest vegetation structure, overstory and understory species composition, and spatial patterns in comparison to historical conditions. These **changes include a large increase of densely-stocked stands with multiple canopy layers or closed canopies with a high proportion of young shade-tolerant species** (including Douglas-fir and subalpine fir in the dry forest type and subalpine fir in the moist forest type). These densely stocked stands tend to be arranged in a more continuous or unbroken pattern across the project area compared to historical conditions. Dry and moist forest stands with lower tree stocking levels and open canopy closure have decreased in total area and patch (stand) size compared to historic levels. **Dry and moist forest stands comprised primarily of large trees also have decreased in total area and patch size compared to historic levels.** Portions of the project area are susceptible to dwarf mistletoe infection, defoliating insects, and bark beetle attacks due to vegetation composition and structure changes from historical conditions. **The risk of crown fire initiation and spread and associated fire effects are greater than historical conditions, particularly in the Buttermilk watershed,** due to increased tree density and development of forest stands with multiple and closed canopy layers across the landscape. Dry and moist forest vegetation in the project area is susceptible to increased frequency and severity of natural disturbances (including insects, disease, and fire) associated with a warmer, drier climate." **[This is one reason the two commercial thinning (timber sales) should be dealt with separately.** Existing drainage conditions shade the drainage bottoms proposed for commercial logging which would result in decreased stream flows and increased water temperatures degrading fisheries habitat.] **"Meadow habitat around Mission Pond and Black Pine Meadows is shrinking due to conifer encroachment. [This can be attributed to intensive cattle use of the meadow and can best be remedied by increased protection from cattle, rather than cyclic commercial logging.]** The amount of large-tree habitat that provides nesting and foraging opportunities for northern goshawk, white-headed woodpecker, western gray squirrels, and other species in the project area is below desirable levels.[These species are dependent on older trees with a closed canopy that will be lost with planned commercial logging. **All of these questions should be examined within an EIS.]**

"Road surfaces have poor drainage and have lost durable road surface which contributes to the potential for road failure and increased maintenance needs." [Introduction of heavy use by an extended commercial logging operation will not solve the problem of forest roads on unstable slopes above creeks (Black Pine road).] "Several roads do not meet current safety or design standards or are now surplus to management needs because of changes in logging system practices or management objectives. The **existing road network costs more to maintain than is available in road maintenance funding;** "about 15 years after the preliminary treatment;" **[Commercial thinning/logging (a timber sale) is scheduled to be the first action of the MRP, other**

actions will be dependent on future budget allocations. Commercial logging will increase the need for road maintenance. The ability to fund that need should be dealt with in an EIS.]

"Alternative 1 was not selected because it does not meet the Purpose and Needs identified for landscape scale restoration. It also does not address known road related impacts to aquatic resources nor does it address increased hazardous fuels conditions within the WUI." [None of the Alternatives meet the purpose and needs because "best available science", including Forest reports, should tell the managers of this public resource that existing and past management have created many watershed function problems that have adversely affected public values including downstream flows, fish and wildlife habitats, and recreational opportunities for future generations. Those problems have been identified as primarily derived from ill advised logging, domestic livestock grazing, and road building in watershed headwaters. Forest lands cannot be "restored" to "historic" conditions or managed to accommodate future, unknown, environmental conditions. Ecological science research has determined that "restoration" of values that have been lost can best and most economically be recovered by not interfering with successional processes. An EIS can resolve this contradiction.]

"Alternative 3 was not selected because it will not provide the road system needed for safe and efficient travel, administration, public use, and protection of natural resources on National Forest system lands now and in the future." "Locating and gathering cattle would become more difficult. This would be considered a long-term, moderate to major, adverse impact to grazing. Decommissioning or closing these additional roads would also result in higher future vegetation treatment costs" [These concerns are to protect ongoing subsidization of commercial beef production on forest lands, however the introduction stated that consideration of livestock grazing would not be included in the EA. Grazing fees are inadequate to cover allotment management costs nor the costs incurred by the environmental damage the grazing produces by spreading invasive plants requiring treatment, as well as the damage to aquatic, wetland, and riparian habitat. An EIS should answer these questions.]

"Public comments requested that the team provide an action alternative that did not require any temporary, non-significant Forest Plan amendments for implementation. The Interdisciplinary Team considered this alternative but decided to not fully develop it because many of the objectives of the project would be compromised to the point of being not implementable or being ineffective in order to attain complete compliance with the Forest Plan." [This indicates that regulations included in the Forest Plan to protect forest resources, including fish and wildlife habitat, would have to be avoided to implement the MRP. An EIS should support that conclusion.]

"Informal consultation has been initiated with the U.S. Fish and Wildlife Service and National Oceanic and Atmosphere Administration – National Marine Fisheries Service in February 2018 based on a Forest Service determination of “likely to adversely affect” summer steelhead and bull trout for the short term due to instream restoration work. “May effect, not likely to adversely affect” is the determination for Spring Chinook,"

[see Revised Temp MRP 07252017.doc “Comments by Dr. D.W. Johnson, Fisheries Scientist and Retired Professor of Biology (B.S. Wildlife Conservation, Washington State U. 1958; Ph.D. Zoology, Arizona State U. 1969) on Revised Preliminary Mission Restoration Project Environmental Assessment. July 2017”. **An EIS would provide the necessary information to settle the initiated consultations.]**

"The proposed activities, including potential access routes and road closures were discussed with the range permittee." **[Resource consumptive interests subsidized by public funding of their activities within the MRP area were supportive of planned activities that would benefit them economically, while residents and LCWA members criticisms of actions with adverse effects on public safety and environmental values were disregarded. The introduction stated that consideration of livestock grazing would not be included in the EA, although here again their consideration is confirmed. Since cattle grazing has been demonstrated to be an important consideration supported by members of the planning collaborative (Cattlemen's Association and County Commissioners) it should be included in the FEA and a subsequent EIS.]**

"The proposal for the Mission Restoration Project includes a project specific Forest Plan amendment to exempt the project from Standards and Guidelines related to the management of deer winter thermal cover." **[Amendments “were not supported by the majority of commenters because they felt that the standards and guidelines within the Okanogan National Forest LMRP were placed there to protect important resources”. Those comments cannot be ignored and the Amendment should not be made.]**

"this amendment allows to the current plan's direction is a reduction in deer winter range cover to levels below Forest Plan Standards and Guidelines (S&G)." "using the best available scientific information" **[There is no evidence that reducing mule deer winter cover from 51% to 33% in their winter range area would have any beneficial affect on the mule deer population. The Forest Standards and Guidelines were established by USFS experts to benefit over wintering mule deer in the absence of grey wolves now present, which increases the importance of that cover. There is no evidence of what “historical” cover was (or when it was since it changes over the centuries), nor what future conditions will be. All of the justification provided above for this amendment serves one purpose; it will benefit the economic condition of the lumber industry supported by “collaborators” that designed the MRP. The amendment allows commercial logging of one 388 acre site of mature timber coveted by a single business at the expense of mule deer and other beneficiaries of a protected watershed**

functioning to the benefit of all that rely on it. A comprehensive EIS should settle this question.]

"Thinning would have beneficial, short- to long-term, minor to moderate effects on ecological conditions within the broader landscape because it would open up the forest canopy and result in an increase in forage available to mule deer and other animals" [**"Other animals" would target cattle for subsidized beef production to encourage a permittee to not abandon his permit for Libby Creek grazing, to satisfy the Cattlemen's Association support, and to maintain sufficient AUMs to retain budget funding for a program lacking economic efficiency. In addition see Revised Temp MRP 07252017.doc "Comments by Dr. D.W. Johnson, Fisheries Scientist and Retired Professor of Biology (B.S. Wildlife Conservation, Washington State U. 1958; Ph.D. Zoology, Arizona State U. 1969) on Revised Preliminary Mission Restoration Project Environmental Assessment. July 2017".]**

"Thinning as provided by the amendment would have an adverse, shortterm, negligible impact on water quality because some thinning would result in commercial haul on forest roads that may contribute sediment to streams and impact water quality."[**Commercial thinning/logging would not be short-term by USFS definition. It is projected to last three years or more and require cyclic "treatments" to maintain project "purpose and needs".]**

"Thinning as provided by the amendment would have a beneficial, long-term, moderate effect on range because thinning in deer winter range cover would promote more open stand structure and increase in forage that would be available as transitory range"[**See the 2008 "Draft Revised AMP"(not provided with MRP documents) which was never initiated when it was replaced by the MRP to obtain the same objective - increased "transitory forage" to avoid reducing cattle AUMs. The MRP was designed to satisfy two short-term economic special interests – the Cattlemen's Assoc. and an Okanogan County mill, not long-term public resource protection.]**

"Thinning as provided by the amendment would have an adverse, short-term, negligible impact on key characteristics associated with aquatic ecosystems because, as discussed in 219.8(a)(2)(iii), it would result in some commercial haul on forest roads that may contribute sediment to streams and impact water quality." [**As submitted on numerous occasions the adverse impacts to critical fisheries habitat would not be "short-term" impact and there is no "best science" evidence for the claim that commercial logging operations have beneficial effects on aquatic values, including Forest expert reports on the effects of past logging in the MRP area. See Revised Temp MRP 07252017.doc "Comments by Dr. D.W. Johnson, Fisheries Scientist and Retired Professor of Biology (B.S. Wildlife Conservation, Washington State U. 1958; Ph.D. Zoology, Arizona State U. 1969) on Revised Preliminary Mission Restoration Project Environmental Assessment. July 2017"]**

"Thinning would cause a beneficial, short- to long-term, minor effect to grizzly bears because thinning would open up forested stands and encourage growth of forage for prey species (deer)" **[As submitted above and elsewhere the MRP was created in part to assure that cattle grazing would continue on increased “transitory forage” , to maintain that level of available forage cyclic “treatments (15-year) would be required. That would assure long-term adverse effects; protection of cattlemen's economic interests is a primary cause of wolf and bear mortality.]**

"Spring Chinook, summer steelhead, and bull trout: Thinning as allowed by the amendment would have an adverse, short-term, negligible effect on habitat for these species because log haul traffic associated with commercial thinning would cross streams on roads and contribute some sediment to streams." [See above comments and Revised Temp MRP 07252017.doc “Comments by Dr. D.W. Johnson, Fisheries Scientist and Retired Professor of Biology (B.S. Wildlife Conservation, Washington State U. 1958; Ph.D. Zoology, Arizona State U. 1969) on Revised Preliminary Mission Restoration Project Environmental Assessment. July 2017”. All of the above "thinning" comments would be resolved with an EIS.]

"Forest-wide and Management Area Standards and Guidelines, and management area specific direction (with the exception of the Forest Plan amendments for winter thermal cover) . One non-significant and temporary, project specific, Forest Plan Amendment is necessary in order to accomplish the Proposed Action." [A commercial logging operation that reduces mule deer winter thermal cover from 51% to 33% is neither non-significant nor temporary with the removal of trees over 100 years old.]

"No Forest Plan Old Growth within the Mission Project boundary is proposed to be treated." [See relevant comments submitted by LCWA members, including Revised Temp MRP 07252017.doc “Comments by Dr. D.W. Johnson, Fisheries Scientist and Retired Professor of Biology (B.S. Wildlife Conservation, Washington State U. 1958; Ph.D. Zoology, Arizona State U. 1969) on Revised Preliminary Mission Restoration Project Environmental Assessment. July 2017”]

"Proposed reductions in effective ground cover in riparian reserves would be avoided, minimized, and mitigated by project design criterion to limit bare soil creation near surface water areas." [This will not happen with commercial thinning/logging occurring in drainage bottoms and subsequent exposure to continuous cattle grazing.]

"Thinning and prescribed fire activities would be designed to maintain effective ground cover and utilize existing roads, skid trails, and landings to minimize the creation of more disturbed soil." [There has been no logging in the area for decades and the previous skid trails, landings, and temporary haul road surfaces have over that time regained a vegetative ground cover; more disturbed soil will be created on those sites in addition to the new skid trails, landings. And roads.]

"Design criteria and objectives would provide for low to moderate fire behavior, resulting in a **low potential to generate short-term fine sediment.**" **[Logging and fire related activities remove ground cover; rain and snow melt will result in soil erosion and fine sediment will be transported downgrade to into drainages and fisheries habitat. See the results of Hunter-McFarland "treatments" in Squaw Creek.]**

"Thinning and prescribed fire treatments would not likely generate measurable increases in sediment yield due to buffers" **[Treatments will be accompanied by continuing cattle grazing and riparian habitat vegetation will not provide adequate buffer zones.]**

"Rock armoring is proposed at up to 33 stream crossings which will reduce sediment delivery to streams."**[See above notations that these treatments will occur only when or if additional public funding appropriations are made available.]**

"Existing fine sediment levels in the project area streams appears to be functioning at risk."**[This "at risk" condition is documented in the reports of Forest and other agency reports reviewed in versions of the MRP EAs.]**

"Mitigation measures such as isolating culvert replacement work sites, decreasing road miles within 300' of streams, removing 6 road crossings of streams, rock armoring of up to 33 road/stream crossings, and repair/replacement of up to 23 culverts **will minimize short-term and long-term sediment impacts.** Fine sediment levels are expected to improve, **once restoration work in riparian habitat is completed.**" **[The MRP is planned to be initiated with commercial logging, prescribed burns, and continuing cattle grazing. As cited above in this and other MRP documents the mitigation measures will not be scheduled until the Forest budget contains allocations for those treatments.]**

"The proposed action meets the Okanogan LRMP for range resources due to increasing and maintaining transitory range for the short-term" **[This document and the DEA contain the stipulation that range and cattle grazing are not part of the MRP yet here again the original goal of the 2008 Draft Amended AMP for increasing cattle forage is documented. It has also been pointed out that this treatment would have to be repeated in 15 year cycles and therefore would not be short-term. See Revised Temp MRP 07252017.doc "Comments by Dr. D.W. Johnson, Fisheries Scientist and Retired Professor of Biology (B.S. Wildlife Conservation, Washington State U. 1958; Ph.D. Zoology, Arizona State U. 1969) on Revised Preliminary Mission Restoration Project Environmental Assessment. July 2017" for more relevant comments.]**

"No short-term loss of recreational opportunities are anticipated" **[The area planned for winter commercial logging operations covered by the required "thermal cover" Amendment is currently used by winter sports enthusiasts including a groomed snowmobile course part of which will become a winter log hauling road. Access to adjacent areas will be reduced by threats to personal safety resulting from logging trucks on the narrow snow and ice covered roads.]**

"Management objectives to protect ecosystems from the impacts of invasive plants and to minimize the creation of conditions that favor invasive plant introduction, establishment, and spread will be met" **[This objective cannot be met while maintaining**

existing permitted cattle grazing as called for without modification within the MRP plans.]

"Endangered Species Act The project "may affect, likely to adversely affect" Spring Chinook, Upper Columbia Steelhead and Bull Trout and for wildlife determinations of "may affect, not likely to adversely affect" for grizzly bear, Northern Spotted Owl, Canada lynx and their critical habitat" [ESA-listed wolves have been omitted here. See Revised Temp MRP 07252017.doc "Comments by Dr. D.W. Johnson, Fisheries Scientist and Retired Professor of Biology (B.S. Wildlife Conservation, Washington State U. 1958; Ph.D. Zoology, Arizona State U. 1969) on Revised Preliminary Mission Restoration Project Environmental Assessment. July 2017" for more relevant comments.]

"Consultation is proposed to take place in February 2018." [This decision has been made by Ranger Liu, but consultation has only been proposed.]

"Magnuson – Stevens Fishery Conservation and Management Act The project analysis area contains habitat for fish species listed under the ESA, Regional Forester's Sensitive Species, Management Indicator Species (MIS), and species for which Essential Fish Habitat (EFH) has been designated under the Magnuson-Stevens Fishery Conservation and Management Act (EA pages 52, 53, and 73-74) under the 1996 amendment to the Magnuson-Stevens Fishery Conservation and Management Act." [These laws and protective measures are in effect to protect these species, although this document proposes MRP treatments that will result in adverse long-term affects to their currently at risk critical habitat by determining non-significance and the avoidance of an EIS. See Revised Temp MRP 07252017.doc "Comments by Dr. D.W. Johnson, Fisheries Scientist and Retired Professor of Biology (B.S. Wildlife Conservation, Washington State U. 1958; Ph.D. Zoology, Arizona State U. 1969) on Revised Preliminary Mission Restoration Project Environmental Assessment. July 2017" for more relevant comments. All of the above comments would be settled by a comprehensive EIS.]