

On behalf of myself, Chris Frue, and as a member of the Libby Creek Watershed Association, this is an Objection to the Mission Restoration Project final EA, Draft Decision Notice and Finding of No Significant Impact for the Mission Restoration Project and Forest Plan Amendment #59 .

The Responsible Official is Michael Williams, (Supervisor, Okanogan-Wenatchee National Forest).

I incorporate all of my previous comments and other communications concerning the Mission Project within this Objection.

Introduction

I strongly object to the Draft Record of Decision and to the Mission Project proposal. The proposed Mission Project will have severe, wide-ranging, and lost-lasting impacts on the environment and on recreational and aesthetic enjoyment of the Libby Creek Watershed, and surrounding areas. The Final Environmental Assessment (“EA” or “Final EA”) fails to disclose many of these impacts, and the EA does not adequately justify them. Moreover, the process by which the EA was developed has failed to provide the statutorily-required opportunities for meaningful public input. In addition, the project does not adequately address how concurrent practices, such as near total suppression of naturally ignited wildfires and large scale grazing, and inadequate models of climate change contribute to cumulative impacts and long term outcomes for this area.

The Mission Restoration Project (“MRP”) is a large scale, high impact manipulation of public lands planned to take place over an indefinite period of time. Despite detailed discussion in the EA of a variety of “treatments”, essentially the only one with funding at the current time is the overstory thinning (hereafter referred to as “logging”) component. This is also by far the most controversial element of the MRP, and received an overwhelming number of negative comments during the scoping process, including opposition by the majority of residents in the area. The project has been marketed to the public in the context of addressing concerns about fire, but has buried the significant information that according to the Methow Ranger District’s own documents and personnel, treatments have had no affect on fire behavior during severe fire conditions.

I. Cumulative Impacts

A. Grazing

Critically, the EA does not adequately address the cumulative impact that ongoing high levels of grazing will have on the project area in areas disturbed by logging. As I wrote in my comments during the scoping period, “In terms of an integrated approach, how is the Forest

Service examining the Mission Project from an interdisciplinary perspective that examines the impacts of cattle on recently logged areas; and forest health in general?" NEPA regulations at 40 CFR § 1508.25 state:

To determine the scope of environmental impact statements, agencies shall consider

(a) Actions (other than unconnected single actions) which may be:

(2) Cumulative actions, which when viewed with other proposed actions have cumulatively significant impacts and should therefore be discussed in the same impact statement.

(3) Similar actions, which when viewed with other reasonably foreseeable or proposed agency actions, have similarities that provide a basis for evaluating their environmental consequences together, such as common timing or geography. An agency may wish to analyze these actions in the same impact statement. It should do so when the best way to assess adequately the combined impacts of similar actions or reasonable alternatives to such actions is to treat them in a single impact statement.

The EA's final range report is dominated by a discussion of the proposed logging's impact on forage, and how the closure of roads would affect permit holders. Impacts of cattle on newly logged land, some of which has been subject to prescribed burns, are regarded as non-existent, or minimal. The possibility of significant damage to the soil structure and the sedimentation of streams is hardly considered at all, and when mentioned, disregarded. The assumption is made that the cattle will remain in the upland locations much longer than is realistic. No consideration is given to delaying the grazing of lands impacted by logging.

In informational hearings for the scoping process and the draft EA, District Ranger Michael Liu explicitly stated that range and grazing issues could not, and would not be discussed.

The EA acknowledges detrimental impacts from cattle in section 3.3, "Both the Buttermilk and Libby Creek sub-watersheds experienced decades of timber harvest, fire suppression, livestock grazing, firewood cutting, dispersed recreation impacts, and road construction with varying effects to aquatic and riparian resources." Also, it notes in 3.4 that "Legacy soil disturbance (disturbance that occurred as a result of past activities) forms the foundation of the soil conditions on the landscape today, the existing soil condition. These activities include but are not limited to: timber harvest, grazing, road construction, recreation, shake mills, and fires." However, the limited discussion of range does not even consider the possibility that long term negative impacts from cattle on logged units should be considered.

Cattle grazing on the arid public lands of the mountain west is indisputably destructive to soils and watersheds, and inevitably results in degradation of riparian zones and sedimentation of streams. It is acknowledged in the EA to be a major factor in the past degradation of the project area's health, yet is not addressed as a cumulative impact.

B. Fire Suppression

The ongoing attempt to suppress all wildfires in the project area, even in conditions of low to moderate fire spread and severity, continues to be one of the most significant impacts on the project area. Nowhere in the EA is the combination of ongoing fire suppression, and logging that attempts to simulate fire examined-- suppression is taken as an a priori assumption. The proposed logging and and modest amount of (and minimally funded) prescribed burning accompanying it will in no way substitute for the ecological role of fire in this environment. As I stated in my draft EA comments, "What best available science does the Forest Service claim supports that this amendment should be given priority over amendments to change harmful fire suppression, or destructive grazing (which this proposed amendment will encourage rather than limit)?"

II. Climate Change

In section 1.4.4 of the EA, The Desired Condition, a key goal of the project is stated as a condition where "Key components of the composition, structure, and pattern of forest vegetation are within either the Historic Range of Variability (HRV), the Future Range of Variability (FRV), or moving towards them." This implies that 1) the Forest Service's model of past conditions is accurate; 2) it is possible to return to them; and 3) future climate change is accurately forecast.

The analysis of past conditions relies heavily on aerial photos from the 1930s; there are virtually no other data points. Whether these photos accurately represent an "ideal" reference point is highly debatable. According to section 3.6 of the EA, "HRV refers to the fluctuations in ecosystem composition, structure, and process over time, especially prior to the influence of Euro-American settlers (USDA Forest Service 2012a)". However, the photos from the 1930's are from a period of intensive grazing and settler impacts on forest lands, and were taken many decades after the "Euro-American settlers" forcibly removed native tribes. The historic conditions of these forests cannot even begin to be understood by such a small and inadequate sample.

To predict future climate conditions and their impact on the forest, the EA relies entirely on EMDS software. I had multiple communications with Richy Harrod, the Okanogan-Wenatchee Forest's EMDS expert. The EMDS software is proprietary, according to him, and the public cannot examine the algorithms it uses, so there is no way for the public to examine the specific methodology used. He stated it uses a single, conservative model of climate change; he expressed that it could be improved by having additional models, but that the funding was not available. He said that essentially, the model predicted that Libby Creek (the key drainage inside the Mission Project) would in the future have the climate of similar canyons 5 or 10 miles to the south. To fail to take into account the very real possibility that climate change could be much more extreme than this, while irrevocably re-engineering the forest structure,

flies in the face of current scientific consensus; simply put, climate change may be more extreme than previously thought, and this type of simplistic modeling is not dependable enough to risk endangering the future of this watershed. As I stated in my scoping period comments, "If [climate change] is being considered at all, it is under a "best case" scenario of a relatively modest increase in temperature and summer aridity. A full disclosure of the model should be made; and other scenarios of greater change should be considered that could influence tree survival, forest type, etc." Because this type of forest engineering without adequate data risks the irrevocable loss of public resources, an EIS should be prepared for this project, as I stated in my scoping comments.

III. Fire

From the onset, the Forest Service has played upon the public's fear of wildfire to promote the Mission Project. One of the key architects of the Okanogan-Wenatchee Forest's restoration strategy, Paul Hessburg, has made presentations with the title of "Mega Fire" (which would be more appropriate on a Hollywood marquis than as the title of a scientific examination). The public has been informed of the number of acres of "stand replacement" fire that burned during the 2014 and 2015 events, without being informed that this acreage includes by definition shrub-steppe. Thus, it is particularly ironic that fire modeling in the Fire and Fuels Resource Report ("FFRP") excludes the top 10% of more severe conditions, and assumes no wind. Page 13 of the FFRP states, "Treatments proposed by this project are not intended to effectively change fire behavior past 90th percentile weather as these environments include low humidities, high temperatures, and winds that create fire behavior that is difficult to alter with thinning and prescribed fire treatments. Winds can accelerate fire characteristics dramatically, but for this analysis, fire behavior was modeled in FlamMap with no wind to show baseline crown fire activity without its influence." Instead of burying this information deep inside the EA, the public should be clearly and directly informed that the proposed treatments will not reduce the intensity and spread of wildfire during severe conditions. As I stated in my scoping comments, "The proposal should identify how the proposed fuel reduction treatments fit into the broader fire plan. What are the specific goals of the fuel reduction effort-- reduce severe fire under extreme conditions?"

Critically, there is no discussion of the negative effects that opening the canopy will have on the speed of fire spread. Much of the infrastructure and buildings lost in the large fires of 2014-15 were due to the rapid progression of the fires through open areas. I wrote in my earlier comments that, "First, no acknowledgement is offered of the fact that if the canopy is opened by overstory logging, fire will spread at a faster rate." The possibility that a wildfire may move more rapidly towards critical areas as a result of treatment, including Twisp, should be carefully examined.

The value of severe fire to many species, and the ecosystem as a whole, is not investigated or taken into account; nor is any amount of severe fire seen as desirable.

III. Future Treatment

The claimed long term benefit from overstory logging in terms of fire resilience before re-treatment is needed is stated in the EA to be around 15 years. Page 42 of the Vegetation Resource Report states, “The improvements in diameter growth and fire resilience would last until a new understory establishes, which would be 15 to 20 years...” However, the likelihood of funding in the future for this treatment of thousands of acres is not explored. Nor is the fact that previous logging operations in the watershed have not received follow up treatment (e.g. the thickets of undergrowth in the S. Fork of Libby Creek in the areas logged in the late 1980s, or the clearcuts up Hornet Draw, still unhealthy decades after the previous logging.) I questioned in my scoping comments the district’s ability to stay engaged in ongoing care of these lands; historically, any larger scale commitment is limited to the times when some kind of commercial extraction is available.

IV. Public Participation

According to 40 CFR 25.3 - Policy and objectives, (b) *“Public participation includes providing access to the decision-making process, seeking input from and conducting dialogue with the public, assimilating public viewpoints and preferences, and demonstrating that those viewpoints and preferences have been considered by the decision-making official.”* Additionally, (c) (2) *“To assure that the government does not make any significant decision on any activity covered by this part without consulting interested and affected segments of the public”.*

The Forest Service, from the inception of the Mission Project, has operated as if management made a decision as to what overstory logging the district wanted to do, and then the scoping and environmental assessment were completed so as to justify that decision. Units were marked before the scoping period was completed. The North Central Washington Forest Health Collaborative contributed heavily to the scoping data and initial analysis, but did not accept stakeholders who were opposed to the overstory component (such as myself). No significant impacts for a 10,000 acre project were acknowledged, and no significant changes to the overstory component made. As I stated in my scoping comments, “The scoping document does not appear to be an open query into what might be beneficial to this area, but instead a very specific plan well on its way to execution.” Nothing that has occurred since contradicts this statement.

V. Public Safety

The EA states (Appendix D, page 385) that concerns about logging traffic on icy winter roads will be addressed by signs, not allowing hauling on weekends and holidays, and prohibiting

use of roads except by those who need to access private property. This does not address the safety of the majority of residents who travel the road during the week, or those who live on FSR 43, on the very steep slope at the bottom of the road, with poor visibility from their driveways. The Forest Service claims that they have no responsibility or interest in discussing the risks that log hauling from their timber sales introduces to the public on county roads; any injuries or fatalities that occur are someone else's responsibility. As I stated in my earlier comments, "Is this document really claiming that there is no increase in risk to the public with heavily loaded log trucks running on these mountain roads under winter driving conditions?" If there is indeed an additional risk, it should be clearly assessed.

Conclusion

At a time of unprecedented climate change and disruption of natural ecosystems, a scientifically and ecologically sound approach to caring for our public lands should not rely on heavy-handed mechanical re-engineering of our forests-- rather, it should rely on the natural world's ability to adapt.

Sincerely,

Chris Frue

PO Box 194

Carlton, WA 98814