

On behalf of myself, Donna (Pema) Bresnahan, 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.

Please assume that acronyms I use in this Objection have the same meaning as they are used in the Final Environmental Assessment (EA). My use of FS means Forest Service.

ASPECTS OF THE PROPOSED PROJECT ADDRESSED BY MY OBJECTIONS:

I. Election by the FS to not do an EIS and the determination of FONSI

Violates NEPA and ESA

Remedy: do an EIS

Supporting reasons can be found below as well as connection to previous comments.

From my previous comments, "This project requires a full EIS. The impacts would be significant and are not fully represented in this EA, especially regarding ESA listed species."

NO IMPACT TO THE HUMAN ENVIRONMENT

The Forest Supervisor states the project "is not a major federal action, individually or cumulatively, that will have a significant effect on the quality of the human environment. As a result, no environmental impact statement (EIS) is needed."

This statement, in an attempt to excuse the need for an EIS, is false. The definition of "human environment" includes the natural and physical environment in the NEPA law. Clearly, this landscape level, multiple watershed project has impact on the human environment, especially given the high degree of recreation that these areas are used for, the need for carbon, the dependence on biodiversity and clean water. We, as humans, are in the 6th mass extinction and this project would contribute to furthering that devastation.

Regarding the degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks, I quote the responsible official, "The Forest Service has considerable experience with implementing the types of actions proposed. The effects analysis as well as science and monitoring shows the effects are not uncertain. Effects do not involve unique or unknown risk."

On the contrary, the FS does not have experience implementing these types of actions. This FRS is new as pointed out below under "precedent." Also, it is simply illogical and unreasonable to claim that there are no uncertain risks. For one, the EA states "the project may affect, is likely to adversely affect Spring Chinook, Upper Columbia Steelhead and Bull Trout." Given that these species are threatened and endangered how could the FS claim there is no risk? Any further degradation of fish habitat risks their decline and/or extinction.

According to the EPA, the following 2 points are basis for objection to an environmental impact statement, and therefore would also be basis for objection to an EA:

- Where there are no applicable standards or where applicable standards will not be violated but there is potential for significant environmental degradation that could be corrected by project modification or other feasible alternatives; or

- Where proceeding with the proposed action would set a precedent for future actions that collectively could result in significant environmental impacts.

There are no Forest Service applicable standards for Natural Range of Variability, but without this standard being part of the analysis there is significant potential for environmental degradation. (The projects Historical Range of Variability and Future Range of Variability are the only “ranges” used which is extremely limiting, not mention that the data the FS used to produce these ranges is highly questionable. From previous comments, “The Forest Service did not consider Natural Range of Variation along with broad and current understandings of historical conditions outside of Forest peer reviews as requested in my scoping comments.”

Regarding bullet point #2 above:

PRECEDENT: The Supervisor states “My decision to implement the actions included in the Mission Restoration Project, Alternative 2, does not establish a precedent for future actions or represent a decision in principle about a future consideration. The project consists of site-specific resource management activities. “

To the public, the FS has consistently presented the Mission Project as setting a precedent. Also, the “site-specific resource” includes 50,000 acres and multiple resources with multiple proposed treatments.

The nature of the proposed action is without precedent and will be a template. One of the authors of the Okanogan Wenatchee Forest Restoration Strategy, Richie Harrod, states “It (*the strategy*) will be a template for future management.”

From the *Methow Valley News*: “The Mission Project is seen as a pioneering undertaking in the Methow Valley by Forest Service officials...restoration on a much larger scale than previous projects, encompassing entire watersheds....”

Furthermore, below you will see the conditions requiring an EIS that apply to this project.

32 CFR 651.41 -conditions requiring an EIS The proposed action has the potential to:

- (a) Significantly affect environmental quality, or public health or safety
- (b) Significantly affect historic (listed or eligible for listing in the National Register of Historic Places, maintained by the National Park Service, Department of Interior), or cultural, archaeological, or scientific resources, public parks and recreation areas, wildlife refuge or wilderness areas, wild and scenic rivers, or aquifers.
- (c) Significantly impact prime and unique farmlands located off-post, wetlands, floodplains, coastal zones, or ecologically important areas, or other areas of unique or critical environmental sensitivity.
- (d) Result in significant or uncertain environmental effects, or unique or unknown environmental risks.
- (e) Significantly affect a federally listed threatened or endangered plant or animal species, a federal candidate species, a species proposed for federal listing, or critical habitat.

From previous comments, “Also, the FS has told the public that this is seen as a pilot project, therefore setting a precedent that could affect many more acres than the Mission Project area itself, being that it would influence other decisions on this the Okanogan Wenatchee National Forest and possibly other National Forests. This cumulative effect should be acknowledged and should be a signal for an EIS.”

II. The distinct lack of adaptive management, including monitoring and evaluation

Violates: NFMA, ESA, BMP, Executive order 11514, NWFP

Remedy: fund all adaptive management components, monitoring and evaluation; demonstrate how each will be planned and executed and for how long and with what budget

Supporting comments are below.

Previous comments: bottom of page 1, all of page 2 and top of page 3 and top of pg 7

Adaptive Management aspects included in the EA are simply on paper with no guarantee that these policies and practices will be attended to in implementation. Along with enforcing design criteria, the assessments, inspections and monitoring spoken of in Appendix D have no funding, yet the EA states in 2.4 “These criteria are an integral part of the proposed actions and the effects analyses presented in Chapter 3 are based on these measures being implemented. Monitoring would occur during implementation and to assess potential impacts caused by project activities. Depending on the impacts observed, specific mitigation measures would be implemented to reduce negative effects. “

The implementation of the adaptive management components will not happen without funding, which makes the above statement false.

Furthermore, the Economics Report makes clear that the FS wants to carry out the commercial logging component no matter what, because “there is no other way to achieve forest health without commercial harvest.”

“Non-Timber Sale Project Costs:”

“The proposed action requires a level of investment that may not be possible within current or expected levels of appropriations. In order to be as effective as possible within budget constraints, an implementation plan would be developed that prioritizes treatments. General guidelines have been developed that would be used to guide this prioritization process. The following three types of treatments have been identified as having the highest priority for implementation.

- Areas closest to the wildland-urban interface (WUI) and emergency egress routes.
- Strategically located treatment units, which because of their location would have a relatively greater effect on modifying fire behavior at the landscape scale.
- Treatments that could be implemented with little or no cost, or which generate funds which can be used to pay for other treatments.

The issue of strategic placement and timing of treatments to effect fire behavior at the landscape scale is the most critical of these in terms of budget constraints. As part of the implementation process, further analysis would be performed to identify the most effective sequence of implementation given budget expectations.”

Clearly, the FS does not even consider the ecological components of the project to come first within budget constraints. The above paragraph makes it obvious that “treatments” (logging and thinning) come first no matter what.

The FS must guarantee that all components of adaptive management, monitoring and evaluation are funded and demonstrate how each component is planned and will be carried out. Specifically, monitoring of sediment need to be well planned (including how many years of monitoring will take place), executed and explained to the public.

III. Aquatic Resources

Violations: ESA, ACS, NWFP, NEPA

Remedy: restoration by only doing rock armoring and decommissioning/closing roads, install appropriate passage pipes for fish and water flow. Provide sediment analysis for all road maintenance and re-construction; do an EIS with sophisticated aquatic analysis

Supporting comments below

There is no complete explanation of whether pre-haul road maintenance/re-construction on Blackpine Lake Rd will be done by the FS or by the timber contractor. Either way, this road is a current demonstration of an extremely poor effort on the part of the FS to steward the transportation system. In 2017 this road had a wash-out that made it nearly impassable, but certainly deposited sediment down a 200' embankment into Libby Creek. The FS made little if any attempt to remedy the situation. This spring the wash-out worsened and the road edge is actually washing into the creek. Aside from the EA claiming that the logging won't cause any sediment problem, Blackpine lake road and other roads present sediment problems now and will also present problems with reconstruction and during hauling or during storms. Who will deal with this road? How will it be monitored for sediment?

“Fine sediment within the Libby Creek drainage is functioning at risk and below desired levels for fish production.” From my comments, “These roads have documented slides from previous logging and the major haul road discussed (*Blackpine Lake Rd*) had a wash out just a few years ago that kept it closed for over a year.”

Pre-haul road maintenance and construction needs to have a specific sediment analysis.

The EA fails a complete analysis of impacts to water resources by eliminating water temperature as an indicator. The Region 6 Aquatic Restoration Strategy and the Okanogan-Wenatchee Whole Watershed Restoration Procedure require identifying degraded habitat indicators which would include stream temperatures. There should be an adequate number of sampling locations, sampling at different periods of flow and at different times of year. “Washington State 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.” This statement is unsubstantiated and leaves “where the sampling locations exist” as far too vague. From my previous comments, “The Aquatics portion of the EA does not adequately address project impact on stream temperatures.”

The EA claims that removal of a few overstory trees along fish streams will not decrease shading or increase temperature. Firstly, “a few” is not quantified. Secondly, this simply is not true because any removal of shade will increase direct solar radiation, thus increasing water temperature. Secondly, removal of overstory trees not directly along the streams will contribute to an entire warming phenomena for that area (increased ground temperature, increased wind), thereby increasing water temperature and early melt-off. Early melt-off will directly affect flow which, along with shade, is a major driving factor for stream temperature alteration.

As stated in the Adaptive Management section of this Objection, the components of this project that are not logging are not funded. The EA has not made it clear what Aquatic/Hydrolic Design Features and Mitigation Measures will be 100% for sure implemented and which may not due to funding.

For one, the EA states “the project may affect, is likely to adversely affect Spring Chinook, Upper Columbia Steelhead and Bull Trout.” Given that these species are threatened and endangered the FS cannot claim there is no risk.

From the EA, “If the purchaser can implement a harvesting plan that meets the winter soil management

objectives then snowplowing and hauling would not take place in winter. “ If the contractor elects to provide a harvesting plan allowing activity not in winter, that plan needs a full environmental assessment and needs to be announced as being available to the public. This is for the protection of aquatic resources. From my previous comments, “The document does not seem to disclose any road work that will need to take place in order to haul logs. All road work will cause sediment which is a detriment to the aquatic resources and ESA listed fish.”

Riparian Reserve buffers are not adequate. From my comments, as quoted from *Implications of New Science for the Aquatic Conservation Strategy of the Northwest Forest Plan*, “Headwater streams warrant wider riparian forest buffers than current ACS provisions to ensure effective retention of sediment and nutrients derived from upslope logging, fire, and landslides.” Clearly, this best available science applies to the Mission Project area where there are ESA listed fish. Recommendations are for 150' or greater. The proposed buffer of less than 50' for slopes 15% or less is simply too little.

Aquatic resource measure of flow using beaver is completely inadequate. Bare soil as a measure of ground cover is completely inadequate. Bare soil and catchment rankings as a measure of sediment are completely inadequate. From my comments, “Water Resource Fig 11 is completely inadequate.”

From the EA Aquatic Report :“Water quality parameters (Washington State Water quality criteria specific to aquatic habitat parameters) most likely susceptible to change by vegetation and fuels treatments are turbidity, fine sediment and temperature. This project would not impact these parameters where the sampling locations exist.” Clearly, the sampling locations were chosen to prove a pre-determined outcome. Sampling locations need to be increased and more strategically located to give a full analysis.

“All identified resource concerns have been addressed, consequently the Environmental Assessment is consistent with 36 CFR 220.7.”

The identified resource concerns are incomplete, as pointed out above.

Furthermore, the sediment sampling information is not current. The EA leads one to believe that the sampling was done for this project, however, the data is from 2011. The data is woefully insufficient given that there were only 2 McNeil samples in the entire area and the data is old. Given that the project has ESA listed fish, the water sampling should be current and sophisticated.

From the EA regarding Riparian Reserves, :”Thinning, harvest activities, and fuels treatments should generate no measurable increase in sediment yield due to buffers and other design criteria.” As I pointed out previously, buffers are not wide enough, design criteria may not be monitored . Best available science does not concur that thinning, harvesting and fuels treatment will not generate sediment, which in the case of ESA listed fish, should be the goal.

Sincerely,
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