



**DEPARTMENT OF
NATURAL RESOURCES**

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February 17, 2023

Aaron Gagnon, District Ranger
Walla Walla Ranger District, Umatilla National Forest
1415 W Rose Street
Walla Walla, WA 99362

Re: Tiger-Mill Project

Dear Ranger Gagnon,

Please accept this comment letter on behalf of the Washington State Department of Natural Resources (DNR). DNR's mission is to manage, sustain, and protect the health and productivity of Washington's lands and waters to meet the needs of present and future generations.

Shared Stewardship and Washington's 20-Year Forest Health Strategic Plan: Eastern Washington

DNR appreciates our partnership with the Umatilla National Forest. Over the last several years our agencies have worked together to proactively advance forest restoration and wildfire risk reduction projects on National Forest System lands. DNR, through our various programs, is also working with the Confederated Tribe of the Umatilla Indian Reservation and other public and private landowners to plan and implement cross-boundary treatments.

DNR is excited to continue to grow our partnership with the Umatilla National Forest and advance the goals outlined in the [Shared Stewardship Investment Strategy](#) and [20-Year Forest Health Strategic Plan: Eastern Washington](#). The Tiger-Mill Project represents a critical next step in responding to the forest health and wildfire crisis facing our state.

The Tiger-Mill Project lies within the Touchet-Mill priority planning area as identified through [Washington's Forest Health Assessment and Treatment Framework](#) and 20-Year Forest Health Strategic Plan. Touchet-Mill is one of 47 priority areas identified in eastern Washington and one of the three priority areas in the Blue Mountains of southeast Washington. The Touchet-Mill planning area encompasses the Touchet River and Mill Creek. Each priority area is selected based on an assessment of forest health and wildfire risk factors, and Mill Creek is a particularly high priority for treatment and long-term resilience given that the watershed serves as the primary drinking water source for the City of Walla Walla.

Tiger-Mill Purpose and Need and Preliminary Proposed Action

The restoration needs identified in the landscape evaluation for the Touchet-Mill Priority Planning Area are well aligned with the Forest Service's purpose and need and preliminary proposed action.

Washington DNR supports the overall project objectives proposed by the Umatilla National Forest, including:

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- Increase opportunities to manage the spread of wildland fire safely and effectively;
- Create stands that are resilient to future disturbances across the landscape and reduce the scale of high severity wildland fire; and
- Reduce the risk associated with wildland fires potential to degrade the municipal water supply.

Planning landscape-scale restoration projects such as Tiger-Mill require significant investments of time, energy, and staff expertise. Given that the Umatilla National Forest may not return to this planning area for some time, we encourage the forest to maintain the current scale of proposed treatments. The preliminary proposed action includes thinning and prescribed fire treatments at a scale commensurate with the threats that climate change, wildfire, and drought pose to drinking water, fish and wildlife, and nearby communities.

Wildfire, Drought, and Climate Change

DNR forest health scientists conducted a landscape evaluation of the Touchet-Mill Priority Planning Area to evaluate existing conditions, departure from historical range of variability, and susceptibility to drought and future wildfires. Fire risk in Mill Creek is moderate, high, and very high relative to other portions of the Touchet-Mill area and relative to other forests of eastern Washington.

Projected warming over the next 20-40 years will shift conditions suitable for moist forest towards conditions suitable for dry forest. Further, low-elevation dry forests may no longer sustain forest cover in the watershed, a change that may be catalyzed by disturbances such as wildfire and drought. Given that portions of Mill Creek include dry and moist forest types that will be vulnerable to increased incidence of drought and wildfire under a changing climate, emphasis should be placed on reducing tree densities through thinning and prescribed fire. Proactive restoration of the watershed will reduce risk of uncharacteristic, high-severity wildfire that could result in the loss of forest cover. Future high-severity wildfire would also undoubtedly lead to degraded water quality and expensive infrastructure upgrades for the City of Walla Walla.

Forest health treatments should be conducted in a way that enhances wildfire response benefits. DNR, in partnership with the Forest Service and other land managers, identified Potential Operational Delineations (POD) and Potential Control Lines (PCL) within the Touchet-Mill priority planning area. The Tiger-Mill preliminary proposed action includes mechanical treatments along a number of the PCLs. DNR encourages that fuel breaks along PCLs be implemented by intersecting large, landscape-level treatment areas with potential control lines as much as possible (effectively creating large versus narrow fuel breaks and achieving the dual benefit of forest health and wildfire response). Increasing the connectivity and size of fuels treatments will enhance the ability of the agency to utilize those treatments to manage a wildland fire or conduct landscape-scale prescribed burns. Limited stand-alone fuel breaks along potential control lines are appropriate when large, landscape-level treatments cannot intersect the control line, and highly valued resources are present, or there is a need to harden a control line for tactical fire reasons. More information on the role of shaded fuel breaks in support of the 20-Year Forest Health Strategic Plan: Eastern Washington can be found online at: [Shaded Fuel Breaks](#)

The findings from the landscape evaluation support the Forest Service's decision to prioritize forest restoration and fuels reduction treatments in the Mill Creek watershed. The full Touchet Mill Landscape Evaluation can be found online at: [Touchet Mill Evaluation](#)

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Forest Restoration and Wildlife Habitat

Mill Creek provides habitat for a diverse range of wildlife. Habitat for species that depend on moist, closed canopy forest with large trees (e.g. Northern Goshawk) is very abundant in the Touchet-Mill Priority Planning Area, with large and aggregated patch sizes. In high fire risk locations such as Mill Creek, the results of the DNR landscape evaluation recommend reducing tree density and canopy cover to reduce crown fire potential and enhance drought vulnerability while maintaining habitat in the most sustainable locations. Treatments will also increase the extent and patch sizes of open canopy habitat on dry and moist sites.

Given the lack of wildfire and disturbance in Mill Creek, dense forest is overly abundant. The landscape comparison photos from the Table Rock Lookout, as shown on page 9 of the NOPA, make clear that many areas previously dominated by open conditions have become forested since the early 1900's. This has impacted wildlife species that rely on young and open forest conditions such as pollinators. Forest restoration and fuels treatments that create more open conditions will not only prepare the landscape for future drought and wildfire, but will also enhance forage and improve habitat for a diverse range of wildlife species.

Public Engagement and State-Federal Partnership

DNR commends the Forest Service's approach to the project and early engagement with the public to seek input throughout the planning process. The interactive story map and open house are thoughtful and inclusive ways to engage with the public and our partners. Building and maintaining stakeholder and partner support will be critical to the success of Tiger-Mill.

DNR is prepared to assist with any additional scientific analyses, technical support, or public engagement that may be useful to the Umatilla National Forest as the agency works to develop alternatives and analyze effects.

The Tiger-Mill project area spans both Washington and Oregon. The comments provided by Washington State Department of Natural Resources are focused on the portions of the project area within Washington State.

If you have questions or would like to discuss these comments further, please contact Andrew Spaeth by emailing Andrew.Spaeth@dnr.wa.gov or by calling 360.890.5543.

Thank you for your consideration of these comments in the project.

Sincerely,



George Geissler
Washington State Forester

c: Andrew Spaeth, DNR