

February 22, 2023

Aaron Gagnon, District Ranger
Joseph Sciarriono, Project Lead
Tiger-Mill Proposed Project
Walla Walla Ranger District
Umatilla National Forest
1415 W Rose St.
Walla Walla, WA 99362

Dear Aaron,

I am writing on behalf of myself as an interested citizen to submit public comment, as well as a private landowner recently effected by the Willoughby Urban Interface Protection Project (WUIPP). While I understand the need to improve forest health on all our National Forests, I have some concerns related to the WUIPP that I feel should be addressed by Umatilla National Forest (Agency) in this NOPA prior to final approval and commencement of this project.

Purpose and Need of Project

In your Tiger-Mill Proposed Project, you state that the public health and safety needs of the community will be served by increasing forest resilience and helping to protect natural and social resources. This project is also being proposed to protect the Mill Creek Municipal Watershed and to restore ecosystem processes and functions that improve landscape diversity and achieve desired vegetation conditions.

You list three purposes and needs:

- Management of wildland fire by reducing hazardous fuels.
- Reduce the scale of high severity wildland fire by creating resilient stands.
- Protect the municipal water supply by controlling for soil disturbance.

You propose to achieve these goals by utilizing:

- Mechanical Treatments
- Tree Thinning
- Commercial Thinning
- Silvicultural Prescriptions
- Logging Systems
- Activity Fuels Reduction
- Non-commercial Thinning
- Surface Fuel Reduction
- Prescribed Fire

You mention:

- Maintenance
- Riparian Habitat Conservation Area Treatments
- Roads Management
- Treatments on Non-Forest Service Lands
- Preliminary Design Elements

Comments on the Proposed Action and Analysis

I will shadow your format for ease of reference.

Beginning with your three purposes and needs. There is no mention of diseased or bug infested trees being a priority in harvest or forest improvement. From observation across the Umatilla National Forest, I have seen severe damage done from these sources. The trees have no commercial value but to achieve the desired resilience in forest health and to reduce fuels risks, these trees must be addressed. I suggest including, as part of the Proposal and Request for Bid from the Contractor, that at the least, these trees be identified in the timber cruise with special paint – not orange or blue – that identifies the tree as needing to be cut and piled for burning later. It is my understanding (and this may be outdated science) that bug piled wood can stay piled for a maximum of 18 months and must then be incinerated. Also, an exception to the maximum 21” rule should be granted to include removal of these trees and proper disposal. Otherwise, the bugs live on and continue their damage. The same scenario would apply to mistletoe infestations and any other spreadable disease processes in each specific unit. **See Photo Exhibit 1. WUIPP Buggy Trees Left Behind**



In reducing stand density to achieve fuel breaks how do you plan to promote future Old Growth Tree stands? This includes the trees ≥ 21 ” DBH rule. If you remove most of these trees, which have the most commercial value, you also remove the next generation of Old Growth Forest. To allow for continuity of this resource, I would like to see a percentage of trees ≥ 21 ” DBH at a maximum for each unit for harvest, leaving behind a percent of these trees, that are healthy, not

marred by logging equipment or riddled with bugs or disease, that will survive to Old Growth stage, as an integral part of a resilient forest plan.

You mention the need to protect the watershed from sediment loads and runoff. Protection of the soils is paramount in these projects. However, your proposed Logging Systems will not meet the desired protections with the allowances you state for road distances, landing sites, and equipment. Additionally, you need to include sections on soil condition requirements for equipment. See the WUIPP Design Criteria Section on SOIL in the Willoughby Signed Decision Notice dated May 29, 2019. To adequately protect soils and maximize prevention of damage and runoff, logging should only be done during the dry season. **Please see Exhibit 2: Soil damage from WUIPP.**



Your harvesting practice methods to achieve the Proposed Project goals need three things to ensure compliance with the stated criteria:

1. Oversight. You need a designated Forester who will be on-site daily, observing and monitoring the project. When the Contractor is out of compliance, immediate notification by the Forester needs to be documented. This notice must be available to the public.
2. Accountability: Both the Contractor(s) and the Forester must be held accountable for the work performance on public lands being done for the Good of The People. There also needs to be clear and cooperative communication between the Agency and members of the public. **See Exhibit 3: District Ranger refuses to answer questions (available upon request to protect personal privacy).**

To put teeth into this there needs to be,

3. Enforcement: Contractors being awarded contracts on Federal public land must be held to the highest standard. They should be required to post a bond in an amount commensurate with the total gross amount of the contract. This amount should be held in an escrow account so that if the Contractor is found to be out of compliance, an immediate fine shall be levied and paid from this account. If the Contractor is out of compliance either more than three times per Project, or more

than a dollar amount, they should be relieved of the contract and replaced. The Agency needs to also create a list, and track Contractor(s) who do not measure up to the required standards of performance. Finally, the Contract itself needs to be a public document. The People have a right to know how much money is being made and the details of the contract. This would include a Contractor or their employees delivering loads of logs to residents for firewood. Photos unavailable at time of submission – available upon request.

In your final section I want to address three additional issues that occurred on the WUIPP:

Maintenance: Also included in the Proposed Project is mention of ongoing activities related to the completion of the project. Burning is a concern and is a concern for the public who will be adversely affected by any smoke and air debris. How do you plan to schedule burning to minimize public health concerns? How will you notify communities of your plans? Will you provide a timeline, as this process may extend for many years.

What is the plan for restoration of the roads, landing areas, and deep gouges and other soil disturbances caused by using logging equipment in soft soils? Because of the extensive damage this causes, and the fact that to reclaim an area causes additional compaction, I strongly encourage you to not allow logging operations when soils are wet. The criteria usually calls for frozen soil, certain ambient air temperatures, and certain snowpack levels. Again, without monitoring and enforcement, soils will be damaged. Your density for logging roads, landing areas, and other staging areas are too high, especially in the shallow upland soils that are so fragile.

What is the plan to address invasive species? How does further disturbance enhance this condition? Please require the Contractor(s) to power wash their equipment prior to bringing it onto USFS lands, as invasive weeds are easily conveyed on equipment. Additional invasives can be brought to the project site by infected equipment.

Also, as far as roads used to transport the raw material to the processing site i.e., log trucks travelling USFS and County roads please include communication with the local residents who will be most affected by the increase in travel, hours of operation (log trucks typically operate from 0200 – 1600 minimum), noise, dust, and increased traffic that may affect farm, ranch, or residence customs, PRIOR to actual activity and approval of this Plan. Please prohibit dry grading of roads due to the increased dust that includes air pollution. Please also inform your Contractor that operation of Off-Highway Vehicles on County roads is prohibited and illegal in Umatilla County. **See Exhibit 4: Dry Grading and Dust**



A note about wildlife and habitat: Because this Project calls for the use of helicopter as well as ground logging, I think the wildlife piece needs to be addressed more thoroughly, based on my observations of wildlife displacement in the WUIPP. As many are aware, there is a problem with elk out-migration from USFS onto private farmlands. This Project will exacerbate the situation, so mitigation measures need to be added to the Proposal. I would submit that you might consider foregoing the hunting season for all units affected by this project for the duration of the project. In addition to trucks, loud equipment (the processors are crazy loud) and helicopters, any hunted species will also have to contend with flying bullets and increased on and off-road vehicle travel (regardless of legality) favored by the hunters, as well as camping and increased human presence. For the duration of the Project, I would suggest eliminating all hunting (not just elk) to ameliorate some of the impact. Furthermore, please note that the Contractor on the WUIPP had an employee that had six hounds. He ran these hounds twice a day, even during elk season. I finally caught him on private land, and I believe that put an end to his tenure. This activity is unnecessary and unacceptable. **Please see Exhibit 5: 6 Hound dogs.**



Finally, I would like to recommend that all federal contracts include a provision that requires the Contractor to supply ample numbers of “Honey Buckets” to each site to minimize human waste pollution and to eliminate the possibility of cross species contamination, in this case, human to wildlife.

In conclusion, I would like to say that I in fact support efforts to improve forest health. For too long the USFS succumbed to popular political pressures and litigation by Big Green to do nothing. The result is the mess we have today. However, it is beyond time that the Agency is held accountable for their decisions and actions as well as inactions. You don’t need any more Acts of Congress or Executive Orders to do your job and do it right. You need to utilize the tools you have and add responsible management and enforcement. In this new era of collaboration, inclusion, and cooperation, don’t forget the Public. Your private landowners are also partners and deserve respect, communication, and participation – regardless of their position on your Project. You are public servants, and you must serve the Public. It is not your land that you steward, nor is it a cheap and easy contract for the Contractor to do with as they please. It belongs to the People. You and the Contractors on these jobs must demonstrate integrity,

intelligence, due diligence, responsibility, and accountability. Nothing short of that is acceptable. You must conduct yourselves as if in a court of law to be kept out of one. Litigation is not the answer. Responsible job performance speaks for itself.

Please, restore our forests in a manner that respects this gift called Earth and all her inhabitants.

Sincerely,

Resident of Umatilla County