



February 23, 2023

US Forest Service, Walla Walla Ranger District
Attn: Aaron Gagnon
1415 W Rose Street
Walla Walla, WA 99362

Submitted electronically to <https://cara.fs2c.usda.gov/Public//CommentInput?Project=62658>

RE: Comments on the Tiger Mill project Proposed Action

I am writing on behalf of the Greater Hells Canyon Council (GHCC) regarding Scoping for the Tiger Mill Project (“project”). GHCC is a non-profit conservation organization based in Northeast Oregon with over 2,000 members and supporters. Our mission is to connect, protect, and restore the wild lands, waters, native species and habitats of the Greater Hells Canyon Region, ensuring a legacy of healthy ecosystems for future generations.

As an organization with a deep investment in the Blue Mountains, the Tiger Mill project area (“project area”) is of interest to us. In addition to providing the drinking water source for the City of Walla Walla, its location is quite ecologically significant, especially when taken in context with the broader landscape. The Mill Creek Inventoried Roadless Area (IRA) sits immediately north of the Walla Walla IRA, west of the Wenaha-Tucannon Wilderness, and immediately adjacent to two proposed Wild & Scenic Rivers and the South Fork Walla Walla Area of Critical Environmental Concern. As a whole, the Blues (including the project area) provide climate refugia and key migration pathways for fish and wildlife. Maintaining the integrity and connectivity of these areas is absolutely essential to ensure resilient terrestrial landscapes.¹

While we recognize the importance of maintaining a clean drinking water source for the City of Walla Walla and support this objective, we request that the Forest Service (“agency”) consider additional objectives while planning the project.

In the Environmental Assessment (EA) to be developed for the project, please develop an Alternative that will provide the highest level of protections for:

- landscape scale habitat conservation and connectivity,
- fish and wildlife values,
- consideration of climate impacts, and
- protection of ecological values in the Roadless Areas and candidate Research Natural Area

Please also consider the following additional comments in your planning:

Roadless Areas, Research Natural Area (RNA), and Landscape Connectivity

- We appreciate that the majority of the proposed logging is outside of the IRAs and the proposed RNA, and that the interior of those areas will be protected from impacts from mechanized commercial equipment. Generally speaking, we are very uncomfortable with thinning projects inside IRAs.

¹ McRae, B.H., K. Popper, A. Jones, M. Schindel, S. Buttrick, K. Hall, R.S. Unnasch, and J. Platt. 2016. Conserving Nature’s Stage: Mapping Omnidirectional Connectivity for Resilient Terrestrial Landscapes in the Pacific Northwest. The Nature Conservancy, Portland Oregon. 47 pp. Available online at: <http://nature.org/resilienceNW> June 30, 2016.





We are particularly concerned with mechanized commercial logging and non-commercial operations, even at the outer perimeters. We request that the agency strategically limit fuel reduction treatments in those areas to hand thinning treatments of small diameter trees---non-commercial and non-mechanized hand thinning and slash treatments.

- Introducing prescribed fire in this landscape is a significant undertaking. We recognize that the agency is trying to balance fuels management in a municipal drinking watershed with land management in an Inventoried Roadless Area. We appreciate that the non-commercial thinning of potential control lines within the IRA will be limited to hand-thinning on ridgetops. Please work to maintain the unique features of this area, especially the candidate RNA, during this work.

Road Impacts

- We appreciate that the agency is not planning road construction in the roadless area. However, we request that an alternative is developed without the use of temporary roads (12.95 miles), especially the 9.55 miles proposed that are not located on existing templates. Temporary roads are not temporary in impact. Temporary roads left in a state of non-use can have impacts on forests and soils that last for decades. The public often continues to use these roads long after implementation of camouflaging and other activities designed to leave them in a state of non-use. As a result, soil compaction/disturbance and sedimentation impacts will continue to persist. The permanent impacts of temporary road construction have been thoroughly documented. See Beschta et al., 2004; Karr et al., 2004. Such long-term damage has even been acknowledged by the Forest Service. Rhodes, 2007.

Eastside Screens and Climate Impacts

- Forests of the Blues, including those in the project area, have significant potential to mitigate the effects of climate change by storing aboveground carbon, and forests in and around the project area have some of the highest aboveground carbon stocks in the Blue Mountains Ecoregion.²
- A recent scientific study found that the biggest and oldest trees covered by the rule make up only 3% of regional forests in the Pacific Northwest yet store 42% of forest carbon.³ They also provide critical habitat for wildlife, keep water clean and cold, are resilient to wildfire, and are at the core of cultural values.
- We appreciate the statement that the agency will not remove trees over 21" within the IRA. However, the intention to remove trees over 21" outside of the IRAs is concerning.
- The agency should use a scientific definition of large trees which is 20" dbh. And the NEPA analysis should clearly disclose the effects of removal of large trees 20-30" dbh under the amended Eastside Screens, as well as large trees removed for safety and operational purposes. The NEPA analysis should be clear about any proposed removal of large trees, including location, extent, and tree species.
- The National Forest Management Act and its implementing regulations require the Forest Service to follow the requirements of the LRMP, as amended. The Eastside Screens adopted in 1994 and 1995 are valid amendments of the LRMP. The Jan 2021 Amendment of the Screens was not adopted pursuant to proper NFMA and NEPA and ESA procedures and so the Forest Service cannot rely on that amendment to authorize the removal of large trees >21" dbh.

² Law BE, Berner LT, Mildrexler DJ, Bloemers RO and Ripple WJ (2022) Strategic reserves in Oregon's forests for biodiversity, water, and carbon to mitigate and adapt to climate change. *Front. For. Glob. Change* 5:1028401. doi: 10.3389/ffgc.2022.1028401

³ Mildrexler DJ, Berner LT, Law BE, Birdsey RA and Moomaw WR (2020) Large Trees Dominate Carbon Storage in Forests East of the Cascade Crest in the United States Pacific Northwest. *Front. For. Glob. Change* 3:594274. doi: 10.3389/ffgc.2020.594274





- In the event the Forest Service may rely on the Trump administration's last-minute decision to approve the [regional Screens Amendment](#) allowing removal of large trees, we object. This amendment is unlawful for a variety of reason, including but not limited to:
 - The Screens Amendment was a public involvement nightmare. The agency failed to provide a scoping period and failed to provide an objection period even though one was promised from the beginning. The agency failed to meaningfully respond to public comment.
 - The decision to amend the Screens and allow removal of large numbers of large trees across a large region is likely to have significant effects on the environment and therefore requires preparation of an Environmental Impact Statement.
 - The Screens EA violated NEPA in numerous ways, including an inadequate analysis of cumulative effects, failed to take a hard look at effects on carbon and climate, habitat for viable populations of species that depend on large and old trees, dense/unmanaged forest, snags and dead wood, riparian and aquatic habitats, etc.
 - The Screens EA failed to consider reasonable alternatives to meet the purpose and need such as retaining old trees regardless of size, and allowing the large-young trees within the dripline of legacy trees to be converted to snags, using prescribed fire to control encroachment of shade-tolerant tree species, and adopting a quantitative, science-based standard for conservation and restoration of large snags and green recruitment trees to meet population goals for snag-associated species.
 - The Screens Amendment also adopted a standardless approach to managing snags and green replacement trees, calling for the provision of *some* snags and green trees to meet the needs of *some* species, but without any assurances that logging will maintain population viability for the species which are most sensitive to the absence of abundant snags.
 - Approval of the Screens amendment violates the procedural and substantive requirements of the NFMA and its implementing regulations.
 - The agency failed to consult with NMFS and FWS regarding ESA-listed species.
 - There is significant new information indicating that grand fir may be more fire resistant than assumed in the NEPA analysis supporting the Screens Amendment. "Fire resistance increases with age due to increased bark thickness and crown base height (Schmidt et al. 1976), and thus there may be differences in fire severity between young (less resistant to fire) and mature stands of fire-resistant species. For instance, large grand fir trees can have a relatively thick bark (Howard and Aleksoff 2000; Hood et al. 2018b). In fact, Flint (1925) highlighted that grand fir can have a degree of fire resistance nearly equal to Douglas-fir."⁴
- We incorporate by reference our scoping comments and comments on the Large Tree Amendment EA and preserve all legal claims related to the issues raised in our NEPA comments.
<https://cara.fs2c.usda.gov/Public/Letter/2612878?project=58050>

⁴ Jose V. Moris, Matthew J. Reilly, Zhiqiang Yang, Warren B. Cohen, Renzo Motta, Davide Ascoli 2022. Using a trait-based approach to assess fire resistance in forest landscapes of the Inland Northwest, USA. *Landsc Ecol* (2022) 37:2149–2164. <https://doi.org/10.1007/s10980-022-01478-w>,
https://www.fs.usda.gov/rm/pubs_journals/2022/rmrs_2022_moris_j001.pdf.





- The Trump Administration's last minute amendment of the Eastside Screens is now under litigation, and if the plaintiffs prevail, the Screens amendment will likely be set aside, and the agency will be required to modify projects to retain trees >21" dbh. The Forest Service should avoid the complications associated with post-decisional changes to this project, by adopting a 21" dbh limit for this project while the litigation proceeds.

We appreciate the time that the agency has devoted to public engagement on this project, especially at the open house event in Walla Walla on February 15, 2023. Thank you for the opportunity to participate in this planning process and for your review of these comments. GHCC looks forward to working with the Forest Service as this project progresses. Please don't hesitate to contact me with any questions.

Sincerely,

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