



November 2, 2024

Umatilla National Forest
Attn: Eric Watrud, Forest Supervisor
72510 Coyote Road,
Pendleton, Oregon 97801

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

RE: Objection to the Tiger Mill project Proposed Action (#62658)

We are writing on behalf of the Greater Hells Canyon Council (GHCC) regarding the Environmental Assessment, Finding of No Significant impact, and Draft Decision Notice for the Tiger Mill Project ("project"). This objection is filed pursuant to issues raised in GHCC's February 23, 2023 scoping comments on the proposed action for the project. The responsible official for this project is Johnny Collin, Walla Walla District Ranger. Our objection is filed pursuant to CFR 218 and we respectfully request a meeting for potential resolution of our objection.

The Tiger-Mill project is located in the Walla Walla Ranger District, approximately 13 miles east of the city of Walla Walla, WA. In addition to providing approximately 90% of the drinking water supply for the City of Walla Walla, the project's 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.

87% of the project area has never been logged, likely due to the constraints of terrain and existing protections. 72% of the project area is the Mill Creek IRA, and 85% of the project area has slopes exceeding 35%.

The Draft Decision Notice would implement Alternative A modified and approve actions including:

- Outside the IRA, commercially thin 6,622 acres, non-commercially thin 5,246 acres, and non-commercially thin 570 acres within type 4 RHCAs.
- Inside the IRA, commercially thin 1,268 acres, non-commercially thin 3,486 acres, and non-commercially thin 190 acres within type 4 RHCAs.
- Prescribed burn 21,325 acres.
- Construct 10.6 miles of temporary road, with 4.8 reusing historically disturbed areas. This would manifest as 64 segments ranging from 0.03 to 0.7 miles long. Haul logs on approximately seven noncontiguous miles of unpaved roads within RHCAs.
- Treating 7,002 acres of undeveloped lands.

These actions may affect or are likely to adversely affect ESA-listed Pacific lamprey, Redband trout, Columbia River bull trout and their Designated Critical Habitat, Middle Columbia River Steelhead and their Designated Critical Habitat.





Statement of Objections

We were disappointed to see that the agency released the Environmental Assessment, Finding of No Significant impact, and Draft Decision Notice at the same time. A project this complex in such an important place is deserving of more time for the public to review and provide feedback.

We would also like to state that we have significant concerns with the use of tethered logging equipment in this project, which is a relatively new technology with limited examples to draw conclusions from. We did note in the Soils Effects Analysis that there is one Project Design Criteria specifically referencing results from Oregon State University graduate study of Sparta units on the Wallowa-Whitman National Forest, but as far as we are aware those results have not been made available to the public yet. The Soils Effects Analysis also references the Supplemental Information Report for the Thomas Creek project as additional rationale, and says it is offered as an Appendix, but we were also unable to find that document in the project record. We have concerns that effects from tethered equipment, which is relatively unproven, could lead to further issues with sediment levels and could adversely affect listed fish species. As noted above, the project actions may affect or are likely to adversely affect ESA-listed aquatic species. Tethered logging will increase this risk.

We appreciate many aspects of this project that are contained in Alternative A including plans for landscape-scale prescribed fire and the downgrading of several treatment types in sensitive locations like the Mill Creek IRA and the Research Natural Area. However, we believe that Alternative B, with some modifications, is a better balanced alternative that would meet the goals of the project while addressing some of the key concerns we addressed in our scoping comments.

Specifically, we object to the commercial harvest of material within the Mill Creek Inventoried Roadless Area, the creation of additional temporary roads outside of existing templates, the harvesting of trees greater than 21 inches at breast height, and commercial logging within undeveloped lands.

While we appreciate that no roads would be constructed in the IRA, there are still opportunities for significant detrimental impacts from the use of commercial harvesting equipment within the roadless area. The creation of temporary roads outside of existing templates in the project area will almost certainly exacerbate impacts to soil and hydrologic resources. Removing trees over 21" would have substantial impacts on habitat quality and carbon storage (as the EA states, up to 38% of the carbon stored in the project area would be removed).

Even though they have no official protections in the forest plan, undeveloped lands outside of IRAs are very ecologically important. We were disappointed to see the extremely limited discussion about them, and that the analysis was conducted primarily within the recreation resource framing. This attitude is best summarized by a statement in the EA, which says that fragmentation or elimination of these areas "would largely be unnoticeable to the casual forest visitor", without any discussion of their benefits.

Our concerns could be addressed by adopting Alternative B with the modification of no commercial treatments or temporary road construction in undeveloped lands.

We recognize the tricky balance that is managing a municipal drinking watershed that exists within an Inventoried Roadless Area. However, we must also remember that the origin of many protected landscapes was to insure that they were not so heavily logged or developed that they lost their abilities to provide critical values to human and ecological communities.





Thank you for your consideration of these objections to the Tiger Mill project. We appreciate the Umatilla National Forest's commitment to thoughtful stewardship of our public lands.

Sincerely,

Jamie Dawson

Jamie Dawson, Conservation Director
Greater Hells Canyon Council
PO Box 607
Enterprise, OR 97828
jamie@hellscanyon.org

Brian Kelly

Brian Kelly, Senior Advisor
Greater Hells Canyon Council
PO Box 607
Enterprise, OR 97828
brian@hellscanyon.org

