

November 4, 2024

RE: Tiger-Mills #62658 Project Objection

VIA: <https://cara.fs2c.usda.gov/Public/Commentinput?Project=62658>

To: Johnny Collin, Walla Walla Ranger District

From: Umatilla County property owner adjacent to Umatilla NF and Umatilla County Taxpayer and Resident, as a Citizen Advocate

Dear Mr. Collin and Mr. Sciarrion, et al:

Thank you for providing me the opportunity to object to the Environmental Assessment, Finding of No Significant Impact, and the Draft Decision Notice for the Tiger-Mill Project.

1. Let me begin by stating that I am not an expert in this process, I lack any PhD in Public Comments for USFS projects. I mention this as part of my objection. NEPA requires public participation through the commenting process, but nowhere is it mandated that this process needs to be complex, convoluted, and high context. According to the Final Summary Assessment for the Blue Mountain Forest Revision Plan, (BMFRP) of which the Walla Walla District and subsequent Tiger-Mills Project is included, the demographic for this region is most immediately Walla Walla County with the second largest population in the region, and Umatilla County with the largest population; which, "can be an indicator of a region's desirability to live and work, whereas population declines can signal challenges in economic opportunities or aging populations."<sup>1</sup> It further describes education level as, "Education level is one of the most compelling indicators of economic success and well-being. Historically, communities with a more educated workforce tend to have higher incomes, have faster growth rates, and are better able to withstand economic downturns and recessions. The socioeconomic planning area has average high school graduation rates and below average college and postgraduate rates when compared to national averages. This pattern is a nationally occurring distinction between urban and rural areas."<sup>2</sup> Therefore, I submit to you that the requirement to participate as a concerned citizen and forest user, in fact, a member of the local community affected by management decisions on the Forest as a whole or as a part, is far beyond the

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<sup>1</sup> <https://usfs-public.app.box.com/v/PinyonPublic/file/1654453199032> (p65)

<sup>2</sup> <https://usfs-public.app.box.com/v/PinyonPublic/file/1654453199032>

capacity of most of the folks in our region. I believe you need to go back to the drawing board and create a document that is written at the 8<sup>th</sup> grade level, in accordance with your own demographic findings.

2. Speaking of the Blue Mountains Forest Revision Plan (BMFRP), known by several other names, which I just said (I'm going all 8<sup>th</sup> grade from now on) is way overdue. Many of us remember the failed attempt that got tabled in 2018. We're already two or three years into the newest version. Your Project references the **1990 Umatilla National Forest Land and Resource Management Plan 9 times**. Again, I refer to the BMFRP, "The National Forest Management Act of 1976 requires every national forest or grassland managed by the Forest Service to develop, maintain, and periodically revise an effective land management plan (also known as a "forest plan").

*It also requires that plans are revised or amended when conditions significantly change. The existing plans, written in 1990, are outdated in many ways.*

*Natural resource and social conditions have changed, new scientific information is available, and there are additional land management laws.*

*There have been changes in communities, economic activity, and land and resource use patterns.*

Forest plans provide strategy and guidance for managing sustainable and healthy forests. We included the three national forests in one plan revision because the landscapes and communities share many similar attributes and values connected by land and water. The process for the development and revision of plans, along with the required content of plans, is outlined in planning regulations, often referred to as the "Planning Rule" (*italic's mine for emphasis*).<sup>3</sup>

For this reason, I think this and all other "Projects" that have any possible negative consequence for the forest or the community, should be tabled also, until we can get a new Forest Plan for the three subject forests.

3. Did someone say Wildfire! As it happened, this September 26<sup>th</sup> I had business in Walla Walla and ended up with a little time on my hands, so I thought, let's drive up Mill Creek Rd. What an education. I was met with a jungle of dried vegetation

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<sup>3</sup> ibid

and overgrown trees in a narrow canyon at the base of steep grassy slopes. Most of the residences, which appeared to have been summer cabins when originally built, were crowded closely and of older construction which spells – dry. I have to admit, on that narrow, basically one lane road that was still paved, I was nervous. If a fire got started in there it would be an inferno. And you'd be trapped.

I had the same feeling this summer at my home at 4200 feet and adjacent to the Umatilla National Forest in the North Fork District. To the west was the Battle Mountain Complex rapidly morphing into the Monkey Complex. To the SE of USFS 52 was a small lightning start as yet un-named. But at 8 miles SE, with a 10mph wind, it was too close for comfort. To the east was the Durkee Complex. If I needed to evacuate I could not because to the west Hwy. 395 was closed north and south. To the east, on that particular day, I-84 was closed from Pendleton to Ontario. Hwy 244 was open but there was nowhere to go, and like Mill Creek Road, it's narrow and surrounded by brush and dead trees, or as I've come to call them, Roman Candles in Waiting. I would have to shelter in place. That's why I've gone to extensive expense and exhaustive work to fire harden, including removing over a dozen 18"+ diameter ponderosa out to 300 feet from all structures. Still, my insurance has skyrocketed. My property taxes increase every year to pay for ODF assistance. All this *after* being the posterchild for the Willoughby Urban Interface Protection Project, which brought me years of quality-of-life disruption, stress, and no protection.

That's because wildfire is a natural part of our landscape and nothing you do will stop it. You can't stop the wind. You can't stop the lightning, you can't stop floods, hurricanes, tornadoes. Our big disaster maker in this neck of the woods is wildfire. And until the Forest Service can get its policies and management around the fact that fire will happen, and loss will happen, your projects are nothing but a new name for logging. And the problems with USFS logging, aka, Silviculture are nothing anyone would want to hang their hat on.

Then October 1<sup>st</sup> as it happened, my brother came to visit. He likes to wet a line, and I wanted another look at the Tiger-Mills watershed I never made it to last time. So off we headed, first stop Jubilee Lake. Further north on USFS 64 we turned off to check out the Bone Springs Warming Shelter located within spitting distance of the Wenaha-Tucannon Wilderness area and just east of...a large plume of smoke. It had the color and smell of a hot fire. Then I saw the spotter plane. Once again, I would miss out on seeing the Tiger-Mills Watershed because I know a wildfire when I see one. We turned around and beat it back to Hwy 204 and the lowlands of the Columbia Basin.

The Willoughby Urban Interface Protection Project should be a posterchild for *why not to do these projects*. I've already talked about that in my first commenting go-round but again, since the damage has been done, instead of rinse and repeat, let's hold the phone and look at the mess USFS has made this time. Let's study this beast – for the timeline you propose for Tiger, anywhere from 0-50 years before we cause damage that cannot be undone.

4. Were we talking about watersheds? And saving them from wildfire, the new Boogie Man of the West. Did someone say, Bull Run? In an article on your website from October 11, 2022, "The Mill Creek Municipal Watershed plays a vital role to the residents of Walla Walla and surrounding communities, providing nearly 90% of the city's water needs. The watershed also provides important habitat for wildlife and fish. The Umatilla National Forest and City of Walla Walla have co-managed the Mill Creek Watershed since 1918 under a unique agreement signed by the Secretary of Agriculture and the City. Protecting the health and resiliency of forested landscapes within the watershed is crucial for reducing runoff of snow, rain, and soil, and for maintaining high quality water for the communities, wildlife, fish and economies that depend on it."<sup>4</sup> I've added the highlights because what I read is that since 1918 this watershed has been providing 90% of the water needs for the Walla Walla area. Without ever logging. And because of not logging this watershed is as virginal as a forest can get around here these days. And because of that it is rich with biodiversity, which is just what the doctor is ordering right now. Because we really need clean water and clean air and wildlife habitat. They're not making it anymore. Have you checked the price of real estate these days? It's a great investment because it's a finite commodity.

Once upon a time, when we the European colonists were few and far between, and predominately believed in Manifest Destiny and the Christian Biblical idea of Man's Dominion (Genesis 1:26), our idea of conquering nature arguably made a little sense. We needed shelter, heat, food, the basics of life. But we're a long way from those days, and we are no longer all of Christian belief systems, that man has dominion, which is what the USFS "science" of Silviculture is created from, in all its misinformed and maligned intentions. Look at Bull Run Watershed that provides, "unfiltered water for nearly one-quarter of Oregon's population, including Portland residents and nineteen suburban cities."<sup>5</sup> Why not look to the USFS and City of

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<sup>4</sup> <https://www.fs.usda.gov/detail/umatilla/news-events/?cid=FSEPRD1066222>

<sup>5</sup> <https://www.pcc.edu/library/wp-content/uploads/2019/06/bull-run-watershed.pdf>

Portland partnership which, "...Congress passed the Bull Run Act in 1977. This law formally authorized the Forest Service and the City of Portland to work together to manage the Bull Run. **The law also created the Bull Run Watershed Management Unit, which includes the water drainage area and the perimeter area closed to the public.**"<sup>6</sup> It's one of the healthiest watersheds in Oregon and, wait for it, is closed to human activity, especially and most specifically, logging. Why? Because past logging practices and roads caused turbidity, or muddying of the waters, that made the drinking water yucky.<sup>7</sup> So again, I implore you, save the drinking water for the folks in the Walla Walla area and stop logging and "forest resiliency" projects. Mark my words, they don't work.

Just look at places where logging has destroyed watershed: Lincoln City, Rockaway Beach, Seaside, Coquille, the list keeps growing. These cities are having to assess their tax base enormous amounts to rebuild their systems, replace them, and/or purchase the land to prevent further degradation. This cost is prohibitive to many lifetime and generational families that live there. "Now, a new joint report from NASA and Oregon-based nonprofit Oregon Wild confirms coastal residents' observations and echoes their concerns,"<sup>8</sup> about turbidity in their water systems. Another article explains, "Jetty Creek is a small, coastal stream flowing into Nehalem Bay that provides drinking water to the communities of Rockaway Beach, Twin Rocks and Nedonna Beach.

In the late 1990s the forest canopy in the Jetty Creek watershed was healthy and intact and the stream ran clear and cold.

Over the past 20 years, this corporate-owned, 1,340-acre watershed has suffered a 90% loss of its forested canopy due to intense timber harvesting, and is now one of the most extensively logged watersheds on the Oregon Coast.

As a result of losing its protective forest canopy, Jetty Creek has experienced a significant decrease in stream flow during hot, dry summer months, and a significant increase in turbidity levels during wet fall and winter months.

During heavy rain events, these increased levels of turbidity can force the shutdown of the water treatment plant located at the lower end of Jetty Creek.

**Studies have shown that removing even a relatively small percentage of forest canopy in a watershed result in erosion of the exposed soil along with an increased**

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<sup>6</sup> <https://www.google.com/search?client=firefox-b-1-d&q=is+bull+run+public+land>

<sup>7</sup> <https://www.fs.usda.gov/detail/mthood/landmanagement/?cid=fseprd1176424>

<sup>8</sup> <https://www.sierraclub.org/sierra/oregon-s-drinking-water-risk-clearcutting>

risk of landslides; with sediment washing into streams and filling them with a fine silt that clogs filters in water treatment plants.

In addition to clogging filters, the organic sediment in turbid stream water reacts with the chlorine used to disinfect drinking water, forming toxic chemical byproducts such as trihalomethanes (THMs) and haloacetic acids (HAAs).

Over the past two decades, the Oregon Health Authority and City of Rockaway Beach have issued multiple alerts about the local drinking water exceeding federal Environmental Protection Agency limits for these chemicals. The first was issued in fall 2004, a few years after Stimson Lumber Company began clear-cutting trees in the Jetty Creek watershed. By 2006, 30% of the forested canopy of the watershed had been destroyed.”<sup>9</sup>

Although this project does not call for clear-cutting, what is apparent from the Willoughby Urban Interface Protection Project, that also did not clear-cut, is that clear-cutting is in fact the end result of forest resiliency treatments including all the methods outlined in the Environmental Assessment, Finding of No Significant Impact, and the Draft Decision Notice for the Tiger-Mill Project.

Please consider setting this project aside. You have around 500 acres of recently burned landscape to assess and study before any further action is taken. I do not agree that you found no significant impact. There sure will be if you proceed with this project. And I think your Environmental Assessment is lacking. Finally, the process for the public to participate in these decisions is far beyond most folks' capability. Just reading 113 pages of this report is exhausting and stressful.

I appreciate the opportunity to comment and voice my objections and provide some suggestions.

Respectfully, Citizen Advocate from Umatilla County

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<sup>9</sup> <https://columbiainsight.org/how-intense-logging-degraded-water-at-a-popular-oregon-coast-town/>