

# Tiger-Mill Project Town Hall Meeting

Tuesday, October 14th at 5:30pm  
City Hall (15 N 3rd Ave, Walla Walla)

## Suggested Questions for City Council and the Forest Service

### Water Quality & Monitoring

- Why is there no quantitative monitoring of turbidity or sedimentation during logging, only after prescribed fire?
- If municipal water intakes are fouled by sediment, will the City or the contractor bear costs for filtration and equipment repair?
- What specific thresholds would trigger corrective action, and who decides when they are exceeded?
- Why were turbidity impacts deferred to a “post-hoc” adaptive approach instead of defined in advance?
- Walla Walla has no filtration plant. If sedimentation increases, who is responsible for the treatment costs and equipment damage? The timber contract explicitly assigns liability for damaged timber, but what about damaged municipal facilities?
- The EA claims “no measurable increase” in turbidity — yet offers no quantitative or monitoring plan. What actual baseline data supports this claim?
- If the City has to invest millions in treatment upgrades, will the Forest Service commit contract revenue toward those costs, or are ratepayers left holding the bill?

*We need an Environmental Impact Statement!*

### Sedimentation & Flood Risk

- Project hydrology specialists acknowledge that canopy removal can accelerate snowmelt, increase peak flows, and destabilize channels. Why isn't downstream flood risk analyzed as a “reasonably foreseeable” impact?

- The 2020 flood caused 57 debris flows and millions in damages. How will tethered logging on steep slopes avoid worsening this hazard?
- With 85% of the watershed >35% slope, why is large-scale mechanical thinning considered safe when soils analyses admit high erosion potential?
- If downstream residents' homes, farms, and businesses are damaged by increased flood risk, what recourse do they have?
- Were flood insurance providers or FEMA consulted about how this project may alter risk maps?
- Why is "wildfire prevention" emphasized as justification, but flood risk prevention—an equally foreseeable hazard—ignored?
- Does the USFS accept liability if reduced canopy cover causes earlier snowmelt and more destructive floods for Walla Walla, College Place, and Touchet?
- Three major floods have hit Mill Creek in just 15 years (2008, 2011, 2020). How can the agencies justify ignoring cumulative flood risk when your own documents show treatments increase runoff?
- The timber contract defines "Catastrophic Damage" (B2.133) to include flood and landslide. If the Forest Service already foresees flood damage as a risk to timber operators, why isn't the same risk acknowledged for downstream residents?
- Who pays for downstream damages (homes, city infrastructure, vineyards, farmland) if thinning accelerates runoff and increases flood severity? Will there be a binding liability mechanism?
- Road construction and temporary roads are major contributors to slope instability. How many new road miles are planned, and where is the flood/erosion modeling for those corridors?

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## Economics & Follow-up

- The EA admits fuels treatments last 15–20 years before fire risk rebounds. How will follow-ups be funded when commercial timber is gone?
- How much timber revenue is projected, and where will it go (federal treasury, county, schools, monitoring fund)? How much is retained locally?

- Will any of the contract revenue be reinvested into flood mitigation or municipal water protections?
- What is the current market value of biomass listed in the timber contract, and why is its removal not quantified in the EA?
- How does the USFS justify tens of millions in treatment costs against uncertain wildfire prevention benefits?
- Has there been any estimation of total project cost, including planning and monitoring? Has a cost-benefit analysis been performed comparing treatment costs to potential damages from either fire or flood?
- How do project costs (planning, roads, inspections, monitoring) compare with revenues? Is this sale net positive or negative for taxpayers?
- The contract allows rate redetermination if floods, slides, or market changes occur. Does this mean the logger's profits are protected while residents bear the environmental risks?
- Will any proceeds be earmarked for long-term watershed monitoring and flood mitigation, or do they simply leave the valley?
- Outside of the commercial timber units, many parts of the plan, including prescribed fire, hand thinning, post-assisted log structures and helicopter harvest carry high cost but little commercial incentive. Who is going to conduct these actions, the USFS or private contractors? What is the current budget for these parts of the plan? Under current budget cuts, what is the likelihood of the rest of the project getting funded?

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## Fire Risk & Prescriptions

- The project is justified almost entirely on the claim of reducing the risk of catastrophic wildfire. What site-specific scientific evidence shows that Mill Creek faces “uncharacteristic” wildfire danger?
- Has the Forest Service conducted fuel load measurements, fire behavior modeling, or stand structure analysis specific to Tiger-Mill? If so, where is that data presented? Why was it not included in the Environmental Assessment?

- Why wasn't a quantitative risk comparison included (e.g., likelihood of severe wildfire with vs. without treatment)?
- If the watershed has already experienced major floods (2008, 2011, 2020) but not recent catastrophic fire, why is fire emphasized while flood risk is ignored?
- The Monitoring Plan requires turbidity monitoring for prescribed fire, which implies a recognized risk to water quality. Why is there no equivalent requirement for logging impacts, which disturb more soil over larger areas?
- Given that the prescribed fire in 2024 escaped containment and burned outside planned units, what assurance can residents have that future burns won't do the same? What metrics are used to compare the damage of prescribed fire to the potential damage of wildfire, and what are the respective costs?
- How will the Forest Service compensate the City or residents if a prescribed burn escapes and causes damage, flooding, or erosion in the watershed?
- If the only justification for logging is wildfire risk reduction, but the scientific evidence is weak or missing, shouldn't the agency prepare a full *Environmental Impact Statement (EIS)* before proceeding?
- How will the public know whether the treatments actually reduce fire risk — what measurable benchmarks are being tracked?
- If treatments fail to reduce risk (or worsen other risks like flood or erosion), what corrective actions will be taken, and who will be held accountable?

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## Soil Disturbance & Landslides

- The Soils report states that ashy volcanic soils lose productivity permanently when eroded or compacted. Why risk this in a municipal watershed?
- What safeguards ensure tethered logging equipment will not initiate landslides on slopes above 35%?
- Will landslide inventories be updated during and after the project, and will they be made public?

- If a debris flow occurs post-project, years after operations, who is responsible for remediation?

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## Aquifer Recharge & Drought Resilience

- Logging reduces canopy cover, which alters snowpack retention and evapotranspiration. What are the expected effects on late-season streamflow and groundwater recharge?
- Has the agency modeled how Tiger-Mill treatments will affect drought resilience for city wells and irrigators?
- If thinning increases spring floods but reduces summer baseflows, how is that consistent with “climate adaptation”?

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## Fish & Habitat

- How will ESA-listed bull trout and steelhead be protected from sedimentation when riparian buffers allow thinning within 300 feet of streams?
- If sediment or temperature increases exceed PACFISH standards, what enforcement actions are taken—pause operations, fines, restoration? If site inspections occur only after timber units are cut, what are the
- How will ESA-listed steelhead and bull trout be protected from herbicide runoff, especially since the contract anticipates “Seed Tree with Reserves” clearcut units likely requiring herbicide?
- How will herbicide applications in regeneration units be monitored to prevent contamination of Mill Creek and North Fork Walla Walla, especially given the investment in salmon recovery in these watersheds?
- Where exactly are the 308 acres of clearcutting located, and what streams are adjacent?
- How will increased sediment and altered flow regimes be reconciled with the millions invested in fish passage and habitat restoration downstream?

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## Biomass & Commercial Thinning

- The EA prescribes ~58% basal area removal on average, but contracts allow up to 70% or more in some units. What percent of trees will actually remain?
- If contractor discretion exceeds prescriptions, what recourse does the City or public have?
- Biomass tonnage is “unestimated” in the EA, yet contracts allow its extraction. How will the environmental impact of biomass removal be measured?
- Why wasn’t a separate NEPA analysis conducted for biomass removal, which changes soil cover, carbon retention and erosion?
- The EA’s carbon reduction estimates and Hydrology Analysis both indicate that “basal area” is a metric of total vegetation, not only timber. But if total vegetation remains “unestimated” as stated in the contract, how are actual basal area reduction prescriptions measured and enforced?

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## Accountability & Liability

- The Monitoring Plan lacks quantitative water quality metrics. Why?
- If deviations from Project Design Criteria result in damages to municipal water or downstream property, who pays, the contractor, USFS, or the City?
- If Project Design Criteria are followed but damage still occurs (e.g. mass movement, aquifer recharge decline), who accepts liability?
- What happens if damage occurs years later, after inspections are closed? Does liability disappear, or is there an ongoing responsibility?
- The contract allows changes in marking and cutting prescriptions at the discretion of the Contracting Officer. How can the public trust that thinning won’t exceed what was analyzed in the EA?
- The FONSI depends on strict compliance with Project Design Criteria. Who enforces these criteria in the field—the logger, USFS staff, or a third party? How is that compliance and enforcement recorded and reported? What is the recourse for violation?

- Why does the EA say fire monitoring will be collaborative with the City, but logging monitoring excludes City participation?
- Will monitoring reports be published publicly, in real time?

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## Public Access & Equity

- Mill Creek is closed to recreation to “protect water quality,” yet logging trucks, heavy equipment, and herbicide spraying are permitted. How do agencies justify this double standard?
- Contracts require protection of roads, survey markers, and culverts. Why is there no comparable requirement to protect community access or equity?
- Will local firewood cutters or small operators have access opportunities equal to large contractors?

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## Governance, Transparency, & Risk

- District Ranger Collin admitted on record: “There’s certainly some risk to any of these actions.” What are those risks, specifically? Why are they not acknowledged in the FONSI?
- Given the scale of impacts on water, fish, and residents, why was no full Environmental Impact Statement (EIS) prepared?
- Who benefits most financially from this project — the community, or out-of-area timber contractors?
- Why isn’t there a community oversight committee for adaptive management in a municipal watershed where thousands of people depend on the outcome?
- Why was a full Environmental Impact Statement not required when hydrology and soils specialists both admitted “significant effects possible”?
- Why was this project advanced before completion of the Watershed Resilience Master Plan, which involves broader collaboration?

- If litigation arises from downstream damages, will the Forest Service indemnify the City and its taxpayers?

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