

Jamie Williams, President, The Wilderness Society
jfu@twsw.org

Mitch Friedman, Executive Director, Conservation Northwest
mitch@conservationnw.org

Jasmine Minbashian, Executive Director, Methow Valley Citizen's Council
jasmine@mvcitizens.org

Chris Wood, CEO, Trout Unlimited
<https://www.tu.org/staffer/chris-wood/>

September 15, 2022

Dear Mr. Williams, Mr. Friedman, Ms. Minbashian, Mr. Wood:

The support of your organizations for massive timbering projects on the national forests—billed as fuels reduction—encompassing entire sub-watersheds and which defy environmental laws, has us perplexed, disappointed, and leaves us with a number of questions. We would appreciate your indulgence.

For many years, our organizations worked hand-in-hand with yours to reduce unsustainable Forest Service logging and other resource exploitation on the national forests, desperately combating the loss of wilderness and biodiversity. Together, we realized many successes. But now we are distressed to see that relationship fading, as we appear to be on opposite sides of management issues impacting some of the most splendid places in the West.

In particular, we have several questions regarding the involvement of your organizations in the North Central Washington Forest Health Collaborative (NCWFHC), and your relationship with the Okanogan-Wenatchee National Forest. Given the support of your organizations for this, and similar projects on national forest lands in the West, we have become more fearful for the future of the national forests as providers of high quality undisturbed habitat, mitigation of climate change, not to mention the status of ecosystem advocacy and allegiance to science.

While we support responsible, surgical fuels reduction projects to mitigate past logging damage, we do not support massive commercial logging projects—paid for with the removal of large trees—as the solution. For example, the Twisp Restoration Project (TRP), and the Midnight Restoration Project, which you have endorsed via your organization's membership in the NCWFHC, would log a combined 77,000 acres encompassing nearly the entire Twisp River Watershed. In the TRP, via a decision that has been approved, the Forest Service has not even disclosed the number, or board foot amount of large old trees that will be removed.

With those projects in mind, we pose the following questions:

1) NEPA has been one of forest advocates' strongest tools to compel the Forest Service to validate its logging projects and minimize ecological impacts. Yet the TRP Environmental Assessment was only analyzed by an Environmental Assessment with a Finding of No Significant Impact. The EA only analyzed one alternative, and the Forest Service rejected a citizen's alternative submitted by the North Cascades Conservation Council. The EA was conducted under NEPA regulations severely weakened by the previous administration.

What is your legal basis for validation of a project as large and complex as the TRP to be authorized with an EA as opposed to an EIS, and that includes only a single action alternative? Even if you feel this is legal, do you believe it is the best approach to analyzing the impacts, and evaluating the options for responsible fuels reduction and ecosystem restoration?

2) The original TRP, prior to its reduction in size in deferring to the Midnight Project, included logging in Late Successional Reserves designated in the Northwest Forest Plan. The Midnight Project, which you are supporting via the North Central Washington Forest Health Collaborative, and are assisting the Forest Service in developing, will authorize logging in the LSR that encompasses most of the area.

Can you provide a legal justification for logging in LSR's? Why do you believe logging LSR's contributes to the protection of ancient forest-dependent species, or that wildfire is an imminent threat that will deplete ancient forest habitat more than logging will?

3) We have reviewed a number of recent studies that show fuels reduction logging is often not successful in preventing unnaturally large fires, and that the reduction in overstory can exacerbate fire danger by allowing extreme drying of ground fuels. In eastside forests, logging slash and natural woody debris, shrubs and grasses are the primary factors enabling fast fire spread, and exacerbating fire intensity. Some of these studies also dispute the common portrayals of "historic" and "desired" conditions.

Have you considered recent contradictory studies, for example, the 2022 study Have western USA fire suppression and megafire active management approaches become a contemporary Sisyphus? by DellaSala, Baker, Hanson, Ruediger, and Baker? Or, Adapt to More Wildfire in Western North American Forests as Climate Changes by Tania Schoennagel, and approved by the National Academy of Sciences? What scientific validation can you provide to support the actions proposed in the TRP?

4) It is widely accepted that the removal of trees up to 25 inches diameter, particularly fire-resistant ponderosa pine and Douglas fir, is counter-productive toward reducing wildfire risk. As you know, the Forest Service has received billions of dollars through the bi-partisan infrastructure bill, the Inflation Reduction Act, and general annual appropriations to pay for fuels reduction. Removing large, old trees to pay for restoration actually undermines the effort. The TRP EA does not limit the number of trees up to 25 inches diameter that will be logged, nor does it disclose how many trees will be taken or how many board feet will be produced overall.

Can you provide scientific validation for the removal of medium/large ponderosa pine and Douglas fir trees over 80 years of age as a means of reducing fire risk and combating climate change? Will you support precluding the removal of medium/large trees from fuels reduction projects due to the recent appropriation of federal dollars to north central Washington forest recovery projects?

5) In formulating the TRP, and currently in the development of the Midnight Project, the Forest Service reached out to the Collaborative exclusively, without informing other publics. Your organizations have been actively assisting the Forest Service to develop the Proposed Action for the Midnight Project, while the agency has not even publicly announced its existence.

Are you aware that the public apart from the organizations, agencies, and companies outside the collaborative are being excluded from participation in the development phase of logging projects? Do you believe all publics should have equal opportunity to develop Proposed Actions, and to be aware of plans to initiate actions impacting national forest land at the inception phase?

We would appreciate having a positive working relationship with the Forest Service, and with your organizations toward the development of projects to (for example) decommission roads, repair trails, eradicate weeds, and inclusively devise surgical fuels reduction projects that focus on reducing ground fuels and removing small standing trees that contribute to fire risk.

But if discussions are limited to concocting commercial timber sales encompassing entire sub-watersheds, with actions continuing over 20 years or more, we take great pause. We believe you would pause as well

if you were to observe the logging that has occurred on the Mission Project—which your organizations helped to develop, and supported in federal court.

If a partnership involves excusing Forest Service implementation of commercial logging during fire suppression efforts; back-burning to enable future fire salvage logging; and sweeping “hazard tree” removal projects—all to avoid accountability to the public and defy law—we cannot justify a partnership based on our missions and organizational objectives.

Many forest advocacy organizations have abandoned their involvement in collaboratives due to the concerns we have raised here. Your responses as to how your organization’s collaborations with the Forest Service, and the projects they enable, fit with your missions and conservation objectives would help us as we seek to achieve the best possible ecological future for the West’s public forests.

Sincerely,

Phil Fenner, President
North Cascades Conservation Council
philf@northcascades.org

Greg Dyson, Conservation Director
WildEarth Guardians
gdyson@wildearthguardians.org

Tim Coleman, Executive Director
Kettle Range Conservation Group
tcoleman@kettlerange.org