

An Open Letter to the Walla Walla Community

Re: Implications of Experimental Forest Management in the Mill Creek Municipal Watershed

April 12, 2026

Dear community members,

I hope this message finds you well. I am writing this out of deep care for our shared landscape and the life it supports, in the hope that you will consider the gravity of the matter at hand.

My name is Paul Lynn. I live in Walla Walla. I have spent the past year closely reviewing the Forest Service's "Tiger-Mill Project" and many related documents in an effort to understand why our municipal source watershed is being used, in the agency's own words, as a "test case" for experimental forest management methods.

To be transparent, I am personally categorically opposed to industrial logging on federally managed lands. But what is being proposed in this watershed is more than a timber project. What I have found raises concerns that I believe extend past ideology, and beyond the boundaries of the Walla Walla valley.

It is framed as a "pilot project" that appears to be part of a larger experimental effort by the agency and its industry partners to establish a new scientific rationale for underwriting industrial logging as a "Natural Climate Solution," using its purported benefits as a pretext foreclosing actual analysis of its effects, and expanding its use under broad "emergency" designations to accelerate implementation and bypass regulatory safeguards. This sets a dangerous precedent, and one I believe is worth challenging before it becomes enshrined in official policy.

I am writing this in the hope of raising awareness, and gaining broader public support for re-opening the project record and compelling analysis of its unexamined risks.¹ I ask in advance for your patience with the length and detail of this letter. I have tried to make it as concise as possible while also doing justice to the complexity and nuance of the issue, and to demonstrate the care, scholarship and scrutiny with which I have arrived at the following conclusions.²

Background and Context

As you may know, the northern Blue Mountains are not easily reduced to a single ecological description. The landscape is defined by steep gradients, complex topography, and a mosaic of microclimates that shift dramatically across short distances. This heterogeneity is part of what gives the region its incredible resilience and unique beauty. It is also part of what makes it difficult to generalize in the context of land management policy.

The Upper Mill Creek Watershed is particularly special. It is a predominantly moist, mixed-conifer forest that has not been logged for nearly 150 years. It has been closed to public

¹ Namely, a full Environmental Impact Statement (EIS), in accordance with the National Environmental Policy Act (NEPA).

² For a complete set of the referenced source material, see WallaWallaWatershed.com/openletter.zip

entry and heavily protected from human disturbance for many generations. The entire watershed lies within an Inventoried Roadless Area and it is contiguous with the Wenaha-Tucannon Wilderness Area. It functions not only as an ecological refuge, but as a working hydrologic system, supplying 90% of municipal drinking water for the City of Walla Walla, which is unfiltered. It is, in both ecological and practical terms, a high-integrity forested watershed.

The Tiger-Mill Project encompasses the entire Mill Creek watershed boundary, as well as the headwaters of Tiger Creek, Webb Creek, Griffin Fork, Burnt Fork and the North Fork and South Fork of the Walla Walla River. The Forest Service describes the project as a “forest restoration” and fuels reduction effort. On paper, it combines thinning and prescribed fire with the stated goal of reducing wildfire risk and protecting water resources.

In practice, the project entails over 12,400 acres of mechanical timber harvest in mature and old growth forests. There is no tree diameter limit for cutting and the majority of the project area is extremely steep.³ It includes commercial logging within the protected municipal watershed boundary and extensive commercial logging in the Inventoried Roadless Area. It also includes more than 20,000 acres of prescribed fire.

The discrepancy between how the project is framed and how it functions is difficult to ignore. While presented as restoration, the scale, intensity, and location of the proposed activities align more closely with an industrial timber operation, with possible restoration elements attached. But the greater concern is far less obvious, and far more severe.

Project Rationale & Implications

The central question that has guided my review is a simple one: why are high-risk interventions and landscape-level disturbances being introduced into a watershed that has been specifically protected to avoid those risks for over 100 years? The answer is not as simple as fire risk reduction or timber revenue.

Having read the complete Environmental Assessment, its appendices, the Specialist Analyses, the Biological Opinion, the first two timber sale contracts, the Tiger Creek burn plan and burn report, many of the City’s internal documents and a large volume of peer-reviewed literature on both sides of the conservation vs. active forest management debate, it is difficult to extract myself from the maddening minutiae of this project enough to offer a high-level summary of its implications, but I will attempt to distill it down to some key highlights that reveal a central incongruity in the agency’s core logic.

The Tiger-Mill Environmental Assessment (EA) repeatedly asserts that the proposed activities will not result in measurable impacts to water quality, streamflow, or aquatic habitat for an extremely imperiled population of bull trout. It further claims that thinning and prescribed fire will improve forest resilience and reduce the risk of severe wildfire.

³ According to the Tiger-Mill Fuels Data spreadsheet, 62% of the project area has slopes greater than 50%.

However, these assertions are not matched by commensurate analysis, nor is there any modelling of or monitoring plan for the direct hydrologic effects of the logging, a very intentional and equally troubling omission, especially within the context of the City's municipal water intake. In effect, the analysis asserts water safety without demonstrating it.

The hydrologic effects of canopy removal from timber harvest and prescribed fire are not speculative. They are well documented, including in the project's own analysis. As noted by the project hydrologist, reductions in forest cover can reduce snow accumulation, accelerate melt, increase runoff, and destabilize channels, leading to increased flood severity, erosion and sediment transport.⁴ But despite this acknowledgement, such effects were minimized, ignored, or, in the case of the very real risk of increased flood severity, were never actually analyzed at all.⁵ These are not abstract concerns, especially in a municipal drinking water watershed with a well-documented history of extreme flooding.

Water systems such as Walla Walla's operate under water quality thresholds that are far more sensitive than those evaluated under the project criteria. The project design specifies a one-time field visit to inspect timber harvest units and determine if additional slash should be piled to slow soil erosion after logging.⁶ But even small increases in sediment or organic material, factors that the project does not measure or consider significant, can still significantly disrupt drinking water treatment processes, trigger regulatory limits and increase already impaired stream temperatures beyond the habitable thresholds of ESA-listed fish species.

The Tiger Creek Fire

Recent events provide a clear and concrete example of these concerns. I think this example merits careful consideration, and so I hope you'll bear with me. In late 2024, a prescribed burn on Tiger Creek—meant as a pilot project for Tiger-Mill—escaped containment, jumped the ridge and burned hundreds of acres inside the municipal watershed, requiring a \$10 million suppression effort and hundreds of wildfire personnel.

Grab samples taken two weeks later measured total organic carbon (TOC) levels in the affected tributary increased by approximately 305% relative to mainstem conditions, which the City attributed to ash runoff from the burn. At the municipal water treatment plant, these increased TOC levels exceeded the Department of Ecology's Aquifer Storage and Recovery (ASR) permit threshold.⁷

The Walla Walla basin's stark dropoff in summer baseflows has been a critical factor in salmonid recovery, and the ASR program is a central component in a decades-long, Tribal-led effort to increase surface flow during the dry months to support imperiled fish populations. Citing this ASR disruption due to this fire, the City declined the Developed Water lease to the Washington

⁴ Tiger-Mill Hydrology Analysis, p. 1

⁵ Increased flood risk was explicitly acknowledged in the project documents, then categorically excluded from analysis. The EA does not examine flood risk at all. I wrote a memo on this subject, which is included in the [source document archive](#).

⁶ Tiger-Mill EA Appendix G - Project Monitoring

⁷ City of Walla Walla Watershed Resiliency Master Plan Draft Final, Ch. 4; Appendix I

Water Trust to augment summer streamflows in 2025, choosing instead to withdraw its full water right from the Mill Creek channel during the critical salmon migration season, thereby exacerbating the conditions that significantly exceeded critical temperature and baseflow thresholds for salmonid habitat—conditions directly relevant to extensive, costly and hard-won Tribal restoration efforts.⁸

I explain this in such detail because this fire was meant to be a “proof of concept” for the Tiger-Mill Project, and because it highlights the interconnected and cascading downstream impacts of upland management decisions. This is a complex, nonlinear system. Small disturbances can produce disproportionately large downstream effects—precisely the kind of effects that would normally require a full Environmental Impact Statement.

Ironically, this fire is being used both as a justification of the fear of wildfire risk in the watershed, and a demonstration of how prescribed fire is safe enough to use in such a sensitive environment. After the fire, a post-burn investigation concluded that the burn plan was followed, and that even though it escaped containment, the result of the fire was well within acceptable disturbance tolerances. The report determined that no corrective action, supplemental analysis or revision of future burn plans was needed.⁹ Prescribed fire escaped containment, water treatment regulatory thresholds were exceeded, yet the project apparently proceeded completely according to plan, which entails burning *hundreds more acres per year* for the next 20+ years.

Mistakes happen. Fire is unpredictable. I acknowledge that disturbances such as fire are an inevitable and even integral function of forest ecology, and can be beneficial in appropriate contexts. But the extent, intensity and nature of the disturbances of the proposed management activities are, in my opinion, irresponsible, shortsighted and completely indefensible in the context of a high-integrity moist forest system on which so many people and so much ecology relies, and the most recent existing site-specific data available support this critique.

More than that, the proposal begs a fundamental question: logging aside, why is so much fire being intentionally introduced into an unusually intact, moist forest? Even the most enthusiastic advocates for prescribed fire are explicit that it should be applied to historically dry, fire-adapted forests, not high-elevation moist forests like those in the Mill Creek watershed. From a very pragmatic, conservative and fiscally responsible perspective, the rationale for this project fundamentally doesn't make sense. Given the stakes for imperiled fish and City water treatment, the standard of proof that any disturbance will be beneficial must be exceptionally high. That standard is nowhere met by the Tiger-Mill Project.

This question has plagued my mind. It is the question that waits for me in the quiet moments, before dawn, when concern for the future ones overwhelms my longing for rest. I have met many of the individuals responsible for these decisions, and want dearly to believe that it is from genuine concern for our shared future that they seek the best course available, and that our disagreement stems from mere difference of opinion. But I just can't make it make sense.

⁸ Ibid.

⁹ Tiger Creek Fire Burned Area Emergency Report, 2025

Logging as a “Natural Climate Solution”

A recent philanthropy grant proposal, which was co-authored by the Forest Service hydrologist Zigmund Napkora, who has been a key proponent of the Tiger-Mill Project since its inception, offers a revealing perspective on how this project is understood within the project team and broader management community.

The grant proposal first frames the Tiger-Mill Project as a response to climate-driven wildfire risk: “In this context, wildfire risk management has effectively become drinking-water infrastructure management.” It extrapolates that “Prescribed fire and thinning are widely recognized Natural Climate Solutions that reintroduce low-intensity fire, reduce fuel accumulation, and improve forest resilience,” an unjustified presupposition which, as I will explain, carries dangerous and far-reaching implications.¹⁰

The proposal explicitly identifies the planned management activities in the Mill Creek watershed as a “case study” for developing decision-support tools that will guide forest treatment planning across broader landscapes: “The Mill Creek watershed serves as a pilot example... intended for use in many watersheds” so that “the workflow can be applied to any forested watersheds across the western United States.”¹¹ Its stated objective is to calibrate a specialized hydrologic modeling tool called the Water Erosion Prediction Project (WEPP), establish treatment thresholds, and optimize the placement and sequencing of prescribed fire and thinning to maximize their scale and speed of implementation.¹²

This framing shifts the purpose of the project in an important way: the watershed is not treated primarily as a place to be protected, but as a system to be tested and experimented upon. The goal is not to assess whether treatments are appropriate—that is fundamentally assumed—but to determine how to implement them more efficiently and at greater scale. The proposal focuses on overcoming “implementation gaps,” increasing treatment pace, and identifying cost-effective strategies for expanding these practices regionally.

This raises a fundamental concern. If the purpose of this work is to calibrate models and justify scaling treatments elsewhere, then the risks borne by this watershed are not confined to this watershed. Specifically, using an exceptionally well-protected, high-integrity moist forest to measure the effects of prescribed fire, and then using that data to establish baselines for maximizing management activities builds a considerable bias toward excessive intervention into the “decision-support modelling tool” that this project is designed to calibrate.

But there is an even more glaring discrepancy at the core of this project that I have not been able to reconcile, and it has significant implications for how its findings may ultimately be used.

The Tiger-Mill Environmental Assessment, the aforementioned research grant proposal and the associated monitoring framework emphasize measuring the effects of *prescribed fire*.

¹⁰ Allen Family Philanthropies Proposal, p. 1

¹¹ Allen Family Philanthropies Proposal, p. 12

¹² Allen Family Philanthropies Proposal, pp. 1–2, 8

Instrumentation, sampling design, and model calibration are all oriented toward capturing *post-fire* sediment and runoff responses. Monitoring sites are established to evaluate burned versus unburned conditions, and the stated goal is to improve predictive capacity for *fire-related* disturbance.¹³

At the same time, the proposal consistently presents “prescribed fire and *thinning*” together, as a unified treatment category. Throughout the document, these interventions are described jointly as “Natural Climate Solutions,” and the decision-support tools being developed are explicitly intended to guide both activities *in combination*.

However, the effects of *mechanical thinning*—particularly in the form of industrial logging proposed within the Tiger-Mill Project—are not equivalent to the effects of prescribed fire. The hydrologic and ecological effects of timber harvest on canopy removal—changes in snowpack dynamics, runoff timing, soil exposure, and sediment mobilization—are not equivalent to those of fire, and cannot be assumed to be interchangeable. Yet the structure of the proposal suggests that the data gathered under one treatment regime will be used to fast-track decisions about the other.

When asked in a recent public meeting, the lead hydrologist confirmed that water quality monitoring would not occur downstream of *any* timber harvest units, only post-fire in unlogged subbasins. This distinction is not reflected in how the treatments are described nor how the results are intended to be applied. **The project is designed to measure the effects of fire, and then generalize its findings to a combined treatment regime that includes large-scale mechanical “thinning.”**

This would be less concerning if “thinning” were a narrowly defined, low-intensity intervention. But within the Tiger-Mill Environmental Assessment, as with much of the present Forest Service terminology, the term is used far more broadly. Of the 12,438 acres of proposed mechanical logging in the Tiger-Mill project, *all* of it is called “thinning.” The EA defines thinning as an *average* 58% reduction in basal area, though the project includes several “total stand replacement” units which are functionally equivalent to clearcuts, yet all of which are consistently categorized under the same blanket term, “mechanical thinning.”

A look at the actual timber contracts underscores this concern, showing that most units allow higher removal rates of 60-70%, at the contractor’s discretion, and a structural ambiguity in how “basal area” is defined and estimated means that even these contract provisions are unenforceable.¹⁴ The only enforceable contract provision determining the extent of “thinning” in any given timber unit requires the contractor to “retain the 3 largest diameter trees per acre.”¹⁵

¹³ Allen Family Philanthropies Proposal, pp. 5–6

¹⁴ In the Tiger-Mill EA, “basal area” is consistently defined as the total cross-sectional area of *all vegetation*, including grasses and shrubs, whereas the timber contract uses the narrower and more conventional definition of the cross-sectional area of *timber*. It also states that the *total vegetation* is unestimated. This means that contract compliance is fundamentally unverifiable.

¹⁵ Tony Timber Sale DxP Contract, p. 148. Post-logging field surveys have repeatedly confirmed that “thinning” consistently involves far more substantial removal than the parlance implies. See

This creates a structural ambiguity. A high-impact activity—industrial timber harvest with substantial canopy removal—is grouped under the same label as lower-intensity treatments, and then paired with prescribed fire in both analysis and communication. When monitoring focuses on only one component of that system, but conclusions are drawn about the whole, the resulting analysis risks being incomplete at best, and systematically misleading at worst.

This matters not only for this project, but for how its findings may be used elsewhere. If the Mill Creek watershed is being used to calibrate models and establish acceptable disturbance thresholds, which are being used to justify and expedite management decisions, and if those thresholds are derived primarily from fire-related data gathered from a high-integrity moist forest system, then applying them as a scientific justification to *maximize* logging “treatments” that “can be applied to any forested watersheds across the western United States and other fire-prone regions” introduces a significant bias on several distinct levels..¹⁶

In this context, the project begins to take on a different character. It is not simply evaluating the impacts of specific treatments within a specific watershed. It is generating a body of evidence that will be used to support a broader management paradigm—one in which mechanical thinning, including high-impact industrial logging, is positioned as a scientifically-grounded “Natural Climate Solution.”

If that evidence is built on a monitoring framework that does not directly measure the effects of logging, and baseline data drawn from the result of fire in an exceptionally well-protected old growth moist forest, then the conclusions drawn from it will carry a degree of confidence that is not supported by the underlying data. In a high-integrity watershed—particularly one that functions as an unfiltered drinking water source—the burden of proof should be exceptionally high. Where uncertainty exists, it should be made explicit, not absorbed into generalized categories that obscure meaningful differences in impact.

For these reasons, I find this discrepancy difficult to dismiss as a technical detail. It appears instead as a foundational issue in how the project is designed, how its results will be interpreted, and how those results may be used to justify future interventions, especially in similarly intact, high-integrity landscapes. (The grant proposal explicitly indicates Bull Run and Cedar River, the forested municipal watersheds of Portland and Seattle, respectively.)

Encoding Systemic Bias

From the perspective of a casual observer, I can understand how my concerns may seem reactionary or inflated. But the suggestion that this modelling tool could be used to encode systemic bias in decision-making is not speculative, it is already being used for precisely this purpose.

“Post-Thinning Gallery” in the [source document archive](#); a casual satellite imagery survey of federal timber projects demonstrates this as well as anything.

¹⁶ Allen Family Philanthropies Proposal, p. 12

In the context of Tiger-Mill, the WEPP model was used to furnish scientific support for the claim that logging for fuels reduction will reduce the hydrologic effects of wildfire. For each of the seven watersheds in the project area, three scenarios were modeled for sediment and water yield: current conditions, post-fire conditions in undisturbed forest, and post-fire conditions after logging. Conspicuously, the direct effects of the logging itself were never included in the modeling.

I assumed that, if there was a pre-logging fire scenario and a post-logging fire scenario, the difference between the parameters used to calibrate the model could then be used to parameterize the effects of logging itself, allowing me to run the model scenario that the hydrologist neglected to apply. At great length I was able to obtain the complete WEPP model input data used to generate these findings, and what it revealed was telling.

None of the built-in modelling parameters pertaining to logging were applied to any hillslope under any scenario (“thinning,” “skid trails,” etc.). The only difference between the pre- and post-logging scenarios was minute reductions in forest cover and fire severity on a subset of slopes. The post-logging fire scenario was based on two assumptions, neither of which are supported by the evidence: that logging uniformly reduces fire severity, and that logging itself has no direct hydrologic impacts. The actual effects of logging were systematically precluded from the modelling scope.¹⁷

In other words, the hydrologist—the same one who co-authored the grant proposal—ran the model using assumed reduction in fire severity, then used the results to support the claim that fire impacts would be reduced. This tautology was not a mistake or an oversight, it was exercising the hydrologist’s intended function of the tool, within the “decision-support” context, in precisely the manner that that function is to be expanded for broader use.

By publishing a results summary graph representing model outputs as nuanced scientific data, the analysis effectively laundered its most problematic assumptions through a black box, producing its own presuppositions as scientific conclusions, which could only be audited through a months-long FOIA blockade-and-appeal swashbuckle, effectively preventing any third-party oversight before the Final Decision Notice and closure of the administrative record under existing NEPA timelines.

What This Means in the Uncertain Future of Federal Policy

Stepping back, this discrepancy also raises a broader concern about how this work may function within the current policy landscape.

In recent years, forest management has increasingly been framed through the lens of “emergency”—wildfire crisis, climate urgency, and the need to accelerate implementation. At the same time, there has been a marked shift in how environmental review is conducted, with

¹⁷ These findings are the result of analysis of the WEPP input data I obtained via a FOIA records request. I summarize these findings in my flood risk analysis (included in the [source document archive](#)) and would be glad to share a more detailed report if interested.

explicit pressure and Executive Orders to streamline or bypass more rigorous analysis under NEPA in favor of expedited decision-making.

Within that context, the development of “decision-ready” tools takes on added significance.

If such tools are used as a substitute for site-specific analysis—particularly in projects where full Environmental Impact Statements are no longer required—then the assumptions embedded within them may effectively stand in for the more detailed scrutiny that NEPA was designed to ensure. Where those assumptions are incomplete or selectively informed, the resulting decisions may carry an appearance of scientific rigor without equivalent depth of evaluation.

This becomes especially consequential when considered alongside the rapid expansion of carbon markets and funding streams for “Natural Climate Solutions,” such as the philanthropic grant fund for which the above proposal was created. As these frameworks grow, so too does the incentive to define certain land management practices as climate-beneficial.

If mechanical thinning, including heavy industrial logging, becomes broadly accepted within that category, it raises the possibility that activities traditionally understood as extractive and destructive could be reframed and *subsidized* as carbon-positive climate interventions, using carbon offsets, tax exemptions and other incentives.

After reviewing the available materials, I have come to a conclusion that I offer cautiously, and with openness to correction: this project is not simply about wildfire risk reduction. It appears to be part of a broader industry-wide effort to establish a scientific and policy framework for expanding industrial logging under the banner of beneficial “Natural Climate Solutions.”

If the Mill Creek watershed is being used to help establish the analytical and policy foundations for this shift, then the implications extend well beyond this project. They touch on how forests are valued, how interventions are justified, and how public and Tribal lands may be managed under the evolving framework of climate response. If that is the case, I am concerned about the precedent it may set, and believe that this is a watershed moment, so to speak, for the ongoing and multi-generational efforts to protect these precious lands.

Moving Forward

The Mill Creek watershed is often described in administrative terms: as a municipal water source, a project area, or a management unit. But it is also part of a larger landscape that supports Tribal fisheries, anchors regional hydrology, and offers a vast refuge for biodiversity, wildlife connectivity and climate resilience. It is irreplaceable.

Decisions made upstream do not remain upstream. Administrations and their agendas come and go, and policy shifts according to the priorities of the day. But the real changes, on the ground, in the forest, cannot be reversed. Perhaps the next generation will make strides that we could not, just as we have come further than our forebears, thanks to their tireless efforts. But it takes many generations of aligned values and coordinated action to restore what can be devastated in a single season by the mere swing of a gavel, or the sweep of a pen.

After extensive analysis, an environmental law group has found a variety of strong legal claims under numerous laws (including NEPA, ESA, CWA and NFMA) that could compel a more careful look at the project's risks. But even with an airtight case, a small nonprofit is not likely to receive deference or injunctive relief from a federal judge without a more robust legal coalition behind them. While the legal team plans to move ahead with litigation, they are apprehensive that a loss could set a precedent the other way, and enshrine this kind of management framework in future case law.

This brings me to my purpose in writing this. What I am hoping for, first and foremost, is just some more awareness about this issue. This project was quietly approved with almost no public knowledge or participation, and I hope to change that going forward.

Beyond that, even a few key voices publicly raising concern about this project could have bearing on how it is understood by a judge. I'm not asking for unilateral opposition to the project or its stated goals, but simply for a closer look at its implications, an examination of the unexamined risks and, notably, an Environmental Impact Statement—prudent demands.

Alternatively, as this matter proceeds toward litigation, I would seek to explore whether there is interest in broader coordination or participation, including the possibility of a standing declaration or an amicus brief. I offer that not as an expectation, but as a potential path should you be moved, as I am, by your concern for our community's future.

If appropriate, I would welcome the opportunity for further conversation. I am well-versed in the project specifics and would be happy to discuss any of its details or present source material, if desired.

In closing, there is one final concern I would like to share. Practices such as prescribed fire and selective thinning have deep roots in ecological and Indigenous land stewardship. They are important tools, and their slow reintroduction into federal forest management has been hard-won.

When those same tools are used under the language of restoration, but in service of large-scale extraction, it risks eroding trust—not only in agencies, but in the practices themselves. That erosion of trust carries its own long-term consequences.

I believe we all share a common interest in protecting the integrity of this landscape, the water it sustains, and the life it supports. It is with gratitude and sincere hope that I offer these thoughts for your consideration, and I will be glad for any thoughts you are willing to share in return.

Thank you for offering so much of your time.

With deep care,
Paul Lynn
Walla Walla, Washington