



## MUCKLESHOOT WILDLIFE PROGRAM

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July 30, 2024

Brian McNeil  
Acting District Ranger  
Snoqualmie Ranger District  
902 SE North Bend Way Bldg. 1  
North Bend, WA 98045

RE: Carbon River Landscape Analysis project #65083, Scoping Notice dated July 1, 2024

Dear District Ranger McNeil,

The Muckleshoot Wildlife Program and Wildlife Committee have reviewed the Carbon River Landscape Analysis project #65083, Scoping Notice dated July 1, 2024. The comments we present below are only from the Tribe's Wildlife Committee and do not necessarily represent the views of other Tribal programs or members who may comment separately. We applaud the Forest Service's initiative to assess the Carbon River area and propose actions to rehabilitate these lands. This analysis area has seen what seems like an exponential increase in recreation use and a lack of active forest management activities, which in combination have degraded these lands to a point where Tribal members have largely refrained from using the area to exercise their Treaty rights to hunt and gather.

The Carbon River Landscape Analysis area is encompassed by the Medicine Creek Treaty area of the Muckleshoot Tribe and has the potential to provide many spiritual, cultural, and subsistence benefits and opportunities for Tribal members. After reviewing the scoping letter, we would like to comment on a few specific items:

### Access

Carbon River Bridge (Table 6, page 27) – We firmly believe option 1 should be the only option considered, as closing off access to a relatively large proportion of the area's open and unclaimed lands along the 7810 road should not be considered. One alternative not proposed could be utilizing the bridge downstream at Upper Fairfax. However, obtaining easements to connect to the 7810 road may be problematic.

7840 road – We strongly support temporarily opening the 7840 road and treating the overstocked, unhealthy forests covering the Chenuis Creek Drainage. Currently, there is what appears to be an illegal gate at the 7810/7840 intersection blocking access to this road that is negatively affecting Tribal Members' Treaty rights to hunt and gather in the Chenuis Creek drainage. This area is an important corridor between the Clearwater Wilderness and Mt Rainier National Park and should be treated as such. Currently, there are almost no Early Successional Forest Ecosystems (ESFEs) in the drainage due to a lack of active forest management following past logging activities. This has led to large expanses of low diversity, densely stocked conifer stands. This lack of forest diversity at the landscape scale results in very

little forage for ungulates where there could be great habitat through thinning and skip and gap treatments. We hope the Forest Service's plan to treat the area is approved, as it will provide for a much more diverse landscape that will benefit ungulates and other wildlife that winter in the valley.

7720 road maintenance issues (S. Prairie Creek) – Anyone who has driven the 7720-22 road system in the past few years will note that it has been lacking maintenance for years. We hope there are plans to bring this road system up to current Forest Service standards so that Tribal members may access the area without worrying about destroying their vehicles.

7820 road – We support the proposed gate on the 7820 road so long as access is provided for Tribal members. The sensitive areas behind this gate could use the extra protection as it is apparent off-road driving is destroying wetland habitats near East Lake.

### **Forest Management**

While the Northwest Forest Plan (NWFP) provided protection of old forests and ways to promote those characteristics, it also limited the creation or maintenance of ESFEs on lands designated as Late Successional Reserve (LSR). Lack of early successional forests reduces biodiversity and negatively impacts deer and elk by reducing available forage. This reduction in forage can lead to a reduced carrying capacity, which in turn decreases tribal hunting opportunities and first foods availability as shown in the Tribe's own research (Vales et al. 2017). We ask that the Forest Service promote the creation of ESFEs in the many aging overstocked stands covering most of the landscape in the analysis area. This includes:

7840 road – Re-opening the 7840 road along Chenuis Creek and treating stands before they reach an age where the NWFP prevents any further treatment or management actions. In addition to the treatment units already mapped, we recommend creating additional non-commercial thinning units on the south facing slope north of the 7840 road to provide early seral habitat connectivity between the Chenuis Creek drainage and the proposed treatments along the 7820 road system.

Township T18N-R7E, Sections 01 and 02 – We recommend prioritizing commercial thinning, particularly Variable Retention Harvest (VRH), where possible due to close proximity to existing deer/elk forage areas on adjacent Muckleshoot property in T18N-R7E, Section 03 and T19N-R7E, Sections 34-36. Based on descriptions provided on pages 12-13, Variable Retention Harvest allows for more flexibility than Variable Density Thinning (VDT) regarding forage habitat creation and more accurately mimics the attributes of natural disturbances valued by Tribal members.

We strongly support all proposed stand treatments and treatment types within the CARLA project area (Table 3, page 16), including the treatment of 192 acres of Inventoried Roadless Areas (IRAs). Our view is supported by the Roadless Area Conservation Rule of 2001, allowing for timber harvest in IRAs as long as some roadless area characteristics (e.g., diversity of plant and animal communities, traditional cultural properties, and sacred sites) are maintained or improved upon and ecosystem structure and function (e.g., reducing the likelihood of uncharacteristic wildfire) is restored (Roadless Area Conservation Rule 2001, Section 294.12 (b)(1)(ii)).

### **Recreation**

New parking lot at Coplay Lake – We oppose the new parking lot and trailhead proposed at the northwest corner of Coplay Lake. Spreading out recreationists over a larger area does not improve the quality of habitat available for wildlife. We propose an alternative of expanding the existing parking area at the Summit Lake trailhead if necessary or implementing the parking reservation system as described on page 28 for the current available parking area at Summit Lake trailhead.

Boardwalk around Coplay – We oppose the construction of a mile-long trail around Coplay Lake as described on page 28. This would disturb important riparian and wetland habitats around the lake that are important for a variety of wildlife species.

Vault Toilet at Celery Meadows TH – We oppose the construction of a vault toilet at the proposed location of the Celery Meadows Trailhead at the end of the 7720 road. This road is currently inaccessible. The 7726 road, though very rough and unmaintained, is now being used as a trailhead to access Celery Meadows, and with the proposed fire break it makes much more sense to place a Vault Toilet and trailhead here.

Please extend a thank you to your staff for working with Muckleshoot biologists on developing these ideas. Also, thank you for taking the time to review our comments and we look forward to working with you on a government to government level to get this assessment completed in a way that benefits the Tribe and protects our Treaty resources.

Sincerely,



Mike Jerry, Sr.  
Chair, Muckleshoot Wildlife Committee

#### Literature Cited

Vales, D.J., Middleton, M.P., McDaniel, M. 2017. A nutrition-based approach for elk habitat management on intensively managed forestlands. *J. For.* 115(5):406-415