



Washington State Chapter

180 Nickerson St, Ste 202
Seattle, WA 98109

May 21, 2025

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

Submitted via Project Portal on Forest Service Website

RE: Carbon River Landscape Analysis project #65083, Draft Environmental Assessment
dated April, 2025

Dear District Ranger McNeil:

On behalf of the Washington Chapter of the Sierra Club, we appreciate the opportunity to submit comments to Mt Baker-Snoqualmie National Forest regarding the content of the proposed Carbon River Landscape Analysis project #65083, Draft Environmental Assessment dated April, 2025.

The Washington State Chapter of the Sierra Club includes over 100,000 members and supporters, working to protect communities and the planet. With over 3.5 million members nationally, the Sierra Club has the largest membership of all environmental public advocacy groups in the United States. We are the oldest engaged and enduring grassroots environmental organization in the United States.

Members of the Washington Chapter have had a long history of working to protect federal lands within the Mt Baker-Snoqualmie National Forests dating back to the White River Land Use Study and the RARE (Roadless Area Review and Evaluation) I and II studies during the 1970's. We commented on the Mt Baker-Snoqualmie Land and Resource Management Plan Draft EIS and Final EIS of 1990. More recently, we participated in the development of the Northwest Forest Plan (NWFP) of 1994 and its subsequent implementation, including several timber sales prepared pursuant to its direction on this Forest.

Early Forest Service comments on this planning process characterized the Carbon River Area as a 'working forest'. We take exception to such a description of this forested area of the National Forest System. The unfortunate recent past of the area is a strong indication that this forest

was worked much too hard and has suffered for the opportunity. Please respect the remaining natural values of this important area and produce a Landscape Analysis that recognizes and retains the area's natural values. On July 29, 2024 we submitted our Comment letter on the Scoping Notice dated July 1, 2024.

We have reviewed the Draft Environmental Assessment (the "Draft EA"), and supporting documentation, and are offering comments on the issues described below.

We start with an extensive discussion of mapping concerns, and our requests for an EIS, and for prioritization of projects over the 30-year lifetime of the project, and for monitoring of implementation and compliance of the projects over the 30-year lifetime of the project. Then, we provide extensive comments on Roadless Inventories. Next we comment on particular sections of the Draft EA and the proposed management actions described in the Draft Environmental Assessment, including but not limited to our significant concerns regarding timber harvest and treatment along Chenuis Creek, and regarding Roads Management. We are particularly concerned about the proposed action that would reopen a long segment of previously decommissioned road in a highly sensitive area adjacent to Mt Rainier National Park and the Clearwater Wilderness. The apparent intent of this action is to treat a small area of younger forest with a non-commercial thin in order to enhance northern spotted owl habitat.

The following is a Table of Contents of the issues addressed in this Comment Letter:

- I. Description of Project -- Size of project and Mapping of Stands proposed to be Treated
- II. Need for EIS and for LRMP Amendment
- III. Prioritization of which portions of the 30-year project take precedence, and prioritization of sequence and timing of projects
- IV. Monitoring
- V. Inventoried Roadless Area Analysis
- VI. Transportation/Road Analysis
- VII. Bridge Analysis
- VIII. Fuel Management
- IX. Riparian Buffers
- X. Specific Tree Issues:
 - A. Cutting trees over 20-inch DBH
 - B. Date at Which Age of Stands is Determined
 - C. Protect Naturally Regenerated Stands; and Habitat Enhancement by topping of trees to protect and create cavities and protect nest platforms
 - D. 'Average' Tree Size
 - E. Additional Tree Mapping and Prescription issues
- XI. Analyze Historic and Proposed use of Pesticides and Herbicides in the Carbon River Area
- XII. Wildlife habitat and connectivity
- XIII. Regarding fisheries
- XIV. Wildlife effects
- XV. Economic Effects Analysis:

XVI. General Comments and Conclusion

Please find our detailed comments on the Draft EA below:

I. Description of Project -- Size of project and Mapping of Stands proposed to be Treated:

This project is located in the Mount Baker-Snoqualmie National Forest (the “MBS”). The MBS is subject to a Land and Resource Management Plan (the “LRMP”), as well as the Northwest Forest Plan (the “NWFP”),

The Draft EA, on page 5, states that the Project Area is 22,734 acres.

Page 2 of the Silviculture Effects Analysis states that the stands suitable for silvicultural treatment are 7,416 acres,

“There are approximately 7,416 acres of stands suitable for silvicultural treatment throughout the project area that are proposed for a range of treatment intensities that include variable density thinning (VDT), variable retention harvest (VRH), and non-commercial thinning (NCT). The total treatment area makes up 33% of the Carbon River Landscape Analysis Project acreage.” [emphasis added]

The stand acres proposed for treatment (cutting and fuels management) consist, as stated in Table 1 on page 2 of the Silviculture Effects Analysis, of the following, using the NWFP land allocation descriptions:

Late Successional Reserves	4,157
Matrix	3,170
Administratively Withdrawn	89
<u>Total</u>	<u>7,416</u>

However, the Map (Figure 1) on page 1 of Appendix A to the Draft EA utilizes *instead* the merged land allocation descriptions found in the MBS LRMP, so we cannot cross identify which acres in which LUA are included in the 7,416 acreage for treatment for which the Forest Service utilized the NWFP LUAs.

We request that the FS revise the suite of maps provided in the final EA so that one map shows the merged land allocations, Management Allocations (MA), per the 1990 LRMP as amended, and a second map shows Land Use Allocations (LUA) per the 1994 NWFP.

In addition, the Table 1 of the Silviculture Effects Analysis appears to have combined the acreage for LSRs with acreage for LSOG. Based on the existing maps, it appears that the 4,157-acre figure is too large for just LSRs.

Further, we request that the following be added to the Final EA and to the Silviculture Effects Analysis:

1. an additional map added to Appendix A to the Draft EA (to be included as part of the Final EA) which uses the NWFP allocation definitions; and
2. revisions to Table 1 of the Silviculture Effects Analysis to include an additional identification of the LUAs described in the MBS LRMP; and
3. a table showing *total acreage proposed for treatment, broken out by land use allocation from both NWFP LUAs and MBS LRMP Management Allocations*, be added to the Final EA as there is no such table in the Draft EA.

The public needs to be able to accurately cross-reference Map 1 of Appendix A with Table 1 of the Silviculture Effects Analysis.

By way of example, using the existing Draft EA, and Appendix A, and the Silviculture Effects Analysis, we cannot identify:

- where the 89 acres of Administratively Withdrawn lands are located, and what the corresponding MBS LRMP Management Allocation is for those 89 acres.
 - Although the activity for the 89 acres is indicated to be non-commercial thinning, we request that the FS identify both the NWFP LUA and the LRMP MA for those 89 acres, as we may have comments on the appropriateness of cutting and fuels management on those 89 acres; our review of the EA indicates that the AW area is MA15 mountain goat habitat; and
- what is the NWFP LUA description of several areas of 1D Roaded Natural (please note that *these 1D areas should be identified as Matrix*), shown on Figure 1 map of Appendix A to the Draft EA, that appear to be included for treatment in the Northern Section?
 - Again, this is an example of where it would be helpful to have both the MBS LRMP MA and the NWFP LUA descriptions. We request that the FS identify the NWFP LUA description for the said 1D Roaded Natural areas, so we can determine whether or not we have concerns with the included 1D stands.

Once we receive information about the LUAs/MAs for proposed treatment areas, then we can evaluate the appropriateness of the proposed treatments.

We also request three (3) additional maps in the EIS/Final EA:

- 1) a map for *NFWP LUAs* showing the LUA boundaries and descriptions *overlaid with* the Proposed Stand Treatment areas, for the entire project., and
- 2) a map for *MBS LRMP MAs* showing the LUA boundaries and descriptions *overlaid with* the Proposed Stand Treatment areas, for the entire project; and
- 3) Maps to locate all forested areas by relevant stand ages for all LUAs, with an emphasis on the following stand age ranges:
 - o Stands less than 80 years old;
 - o Stands over 80 years of age.

The existing maps do not show the LUA overlays with the proposed Stand Treatment areas, although there is a separate map showing just the MBS LRMP LUAs, and additional separate maps showing Stand Treatment areas but not the LUAs for the Stand Treatment areas.

The requested maps and overlay, as well as the additional data requested, are important for understanding precisely in which LUAs the stand treatment will occur.

II. Need for EIS and for LRMP Amendment

Per the Draft EA, this is a thirty (30) year project; with a third of the treatments being conducted per decade. Unfortunately, the Draft EA does not describe the timing of the timber cuts nor the timing of the fuel treatments.

We request that the FS provide in the Final EA/Environmental Document the following schedules of treatments over the 30-year life of the proposed project:

- the annual timing, acreage and location of timber cuts and the volumes to be cut each year; and
- the annual timing, acreage and location of fuel treatments; and
- Maintenance fuel treatment.

The Draft EA, given the number of years that the project will be conducted, *is in essence an outline without the necessary details*, as we expand upon in these comments.

Therefore, **the Sierra Club requests** the following:

- a) the Forest Service (the" FS") provide an EIS for this thirty (30) year-long thinning and fuels treatment project, as well as an amendment to the LRMP;

- b) the FS provide a *prioritization schedule* of which stands are to be harvested when, and which fuel treatments are to be conducted when, and when maintenance of the fuel treatments is expected to be conducted;
- c) the FS provide in the EIS/Final EA for monitoring and compliance reports; and
- d) the FS provide in the EIS/Final EA for public review and participation. The project area is highly visited, within easy driving distance from Tacoma and other communities.

We expand on these requests below.

Minor changes in the project documents could have major impacts on the Carbon River Project Area, and it is imperative that the project documents “get it right” from the start. Additionally, the 30-year duration of this project requires that project documents are prepared that anticipate the changeability of both the natural condition of the Forest and the teams of people who are carrying out this project in the future. **We request** that adequate guardrails must be in place to ensure that the intent of the project is not lost as the years progress.

Requirements for NEPA compliance set forth in 36CFR§220.6(2)(c) specify that

*“If the responsible official determines, based on scoping, that it is uncertain whether the proposed action may have a significant effect on the environment, prepare an EA. If the responsible official determines, based on scoping, that the proposed action **may have** a significant environmental effect, prepare an EIS.”*
[emphasis added]

The resource conditions that are to be considered at a minimum include “Federally listed threatened or endangered species or designated critical habitat,” and “Inventoried roadless area(s)” 36CFR§220.6(2)(b)].

Given the fact that this project is to be carried out over a period of 30 years, it is logical to assume that the proposed action **may have** a significant environmental impact, and **we request** that an EIS must be prepared.

In addition, the LRMP of the MBS NF was completed in 1990. 36CFR§219.7 specifies that LRMPs should be amended at least every 15 years in order to reflect the changed conditions on the Forest.

Ideally, the MBS would update the LRMP now in order to analyze and prescribe a management condition such as this stand treatment project of 7,416 acres, which covers 33% of the Carbon River Landscape Analysis Project of 22,734 acres. The LRMP is now 35 years old, and past due for two amendments, one in 2005 and one in 2020.

As the MBS LRMP is not up to date, an additional reason for an EIS is that an EIS would provide the level of analysis required to adequately study the impacts of this large and lengthy project on the Carbon River Landscape Analysis Project acreage.

No project should be approved for a substantially longer period than the period for which the MBS LRMP is approved. **We demand** that the Carbon River Landscape Analysis Project, being a 30-year-long project, be reevaluated in an EIS.

III. Prioritization of which portions of the 30-year project take precedence, and prioritization of sequence and timing of projects

A landscape scale project of this scope, intended to be carried out over 30 years, requires that there be decisions made to establish which portions of the 30-year project will take precedence as well as identifying which units of the project will occur when. A clear prioritization matrix will help in establishing the hierarchy of project importance, in particular when/if current Forest Service staffing changes over the years and the project document provides the sole point of reference for future management decisions.

We request that this prioritization must present the guidelines with which the implementation of the project will be carried out. Some questions that might need to be answered, as well as others, are the following:

- Will projects be designed to focus primarily on fire safety near developed areas? Will these projects be carried out first?
- Which units of the project will receive treatment when?
- Will ecological restoration for NSO and MAMU habitat take precedence?
- Will projects with severe aquatic degradation take priority over commercial thinning?
- Will non-commercial thinning and burning be performed despite the cost to the Forest, and despite the challenges of scheduling prescribed burns (air quality, etc.)?
- Will timber extraction through commercial thinning take precedence over those activities that impact the Ranger District budget?
- How will the proceeds from commercial thinning sales be spent? Will these proceeds be used only for subsequent restoration projects within the project area?
- Which prescribed burns and cultural burns will take precedence? How will burn and other maintenance needs for treated areas be accomplished alongside future scheduled harvest treatments?

We request that a structured decision matrix that quantifies the prioritization decisions must be developed for the environmental document produced after review of comments on the Draft EA. Whether the environmental document is an EIS, as requested in this Comment Letter,

or a Final EA, that document is referred to collectively herein as the '**Environmental Document**'.

As part of the prioritization decision matrix, **we request** an acknowledgement that some of the inventoried trees in the project stands will 'age out' over the course of the 30-year duration of the Project and thus will be dropped from implementation.

IV. Monitoring

Any plan with a 30-year duration must include monitoring and periodic reviews to establish efficacy of projects, in particular those designed to improve both terrestrial and aquatic habitat. **We request** that monitoring and periodic reviews of the project elements must be addressed in the Environmental Document. **We request**, by way of example, that the following questions be addressed in the monitoring requirements:

- Is the project "increasing structural diversity" and "building resiliency"?
- Given the project design and how it will be carried out, are conditions changing that result in lack of efficacy (by way of example, impacts of climate change during the 30-year duration)?
- What are measurable parameters that can be used to chart the success of the program?

Note that monitoring of Forest projects is a requirement of the NWFP in which the Standards & Guidelines specify:

"Monitoring is an essential component of natural resource management because it provides information on the relative success of management strategies. The implementation of these standards and guidelines will be monitored to ensure that management actions are meeting the objectives of the prescribed standards and guidelines, and that they comply with laws and management policy. Monitoring will provide information to determine if the standards and guidelines are being followed (implementation monitoring), verify if they are achieving the desired results (effectiveness monitoring), and determine if underlying assumptions are sound (validation monitoring)". (NWFP, S&G p E-1)

We request that a regular monitoring program, such as an annual coordination program, combined with regularly scheduled status reports, would provide a basic overview of the success of this decades-long project, and of compliance with the intended parameters of the project. For example, **we request** that Resource Specialist reports would delineate monitoring elements, annual implementation monitoring would be carried out that is summarized in an annual report to be presented at an annual coordination meeting, and additional monitoring would be conducted to demonstrate effectiveness and validation of implementation of the

project, to be presented every 5-years, which would provide guidance for future project adaptations and adjustments.

We request that a monitoring plan in the Environmental Document would clearly describe how the annual monitoring will take place, what will be measured and tracked, and how the Forest Service will apply adaptive management to study the cumulative impacts of the project and that the monitoring plan would describe when, why, and how the Forest Service will make changes to future projects as a result of such monitoring.

The monitoring plan would include monitoring impacts of the project on the Northern Spotted Owl, such as including the actual acres of disturbance, individual suitable nest trees removed, and suitable habitat affected. In addition, there are many other impacts that this project will have on the Carbon River Forest which should be included in the monitoring plan such as the following: aquatic impacts due to thinning in Riparian Reserves, impacts to marbled murrelet nesting/foraging areas, efficacy of clearing for huckleberry management, and other project goals.

For these reasons, **we request** that the project include provisions for a Supplemental EA to be prepared every 5 years throughout the course of the project life cycle. This Supplemental EA should review the effectiveness and validation monitoring that has been completed, consider the efficacy of the project components, review the change in Forest conditions that have occurred over time, analyze the financial impacts of the project, and consider the public comments regarding these elements. Adaptive Management is an integral part of long-term forest management, and **we request** that the monitoring plan, including adaptive management, must be proactively designed in order to be successful. A 5-year Supplemental EA would allow the Forest Service to study and consider the impacts of their actions, and change course where the need arises.

We request that all annual and other periodic implementation consistency reviews be made available publicly both as part of the Public Participation Process as well as permanently either on the project website, or on the MBSNF website.

We address in the following pages our additional and specific concerns with the Draft EA

V. Inventoried and Un-inventoried Roadless Area Analysis

1. The 20250423 Roadless Area Effects Analysis (“Roadless Area Effects Analysis”) (pdf page 1) shows that Figures 1 (and Figures 2-4) define Roadless Areas in the CARLA project Area.

COMMENT: While we acknowledge that Figure 1 and related figures represent what was “Inventoried” as Roadless Areas (IRA), the information provided in Figure 5 “Undeveloped lands within the northern portion of the project area,” and Figure 6 “Undeveloped lands within the southern portion of the project area” more accurately describe the lands that are in fact

actually roadless and undeveloped as defined by the 2001 Roadless Rule. Figures 5 and 6 substantiate our concern that the existing “inventory” is not as accurate as it could be.

We request that the Undeveloped Lands shown on Figures 5 and 6 of the Roadless Area Effects Analysis **be given equivalent protections as the Inventoried Roadless Areas.**

In particular, **we request** that the Inventoried Roadless Area boundary be expanded to include all parcels ['Undeveloped Lands (draft)'] that are contiguous to existing Clearwater Wilderness, either directly or indirectly through an Inventoried Roadless Area parcel. **We request** that these Undeveloped Lands (draft) areas not be subject to any vegetative management activities in either this Landscape Management Project or any future projects that would impact or impair their undeveloped character and value.

2. The Roadless Area Effects Analysis (page 1) states that the management of some areas was intended to retain the undeveloped character of the roadless area, including but not limited to MA 1B Semi-primitive while other areas were allocated to timber harvest.

COMMENT: Because the project area has been heavily influenced by adjacent past logging and road building, it is a transition zone with immediately adjacent areas of highly prized ecological value (Mt Rainier National Park and Clearwater Wilderness). Consequently, **we request** that the project area must be treated far more gently than has been the case in the past. Having visited this area, we take strong issue with the Forest Plan finding that “*...there is no potential for solitude and primitive recreation...*” since some roads and clear cuts happen to exist in the vicinity. The undeveloped parcels in the Carbon River project area are wild and should remain so.

3. The Roadless Area Effects Analysis Table 2 (page 2) notes that several of the Clearwater IRA Management Allocations allow for timber harvest.

COMMENT: **We request** that the CARLA Project be revised to call for a different LRMP management allocation for the Clearwater IRA parcels in Section 26 and 34 (T18N, R7E) *where timber harvest of any nature is neither scheduled nor allowed.*

The inclusion of these IRA components within MA 1D is certainly the result of an error in management allocation process since timber cutting would not be appropriate here because *these sub-areas are functional components of the Clearwater Wilderness.*

Table 3 (page 2) calls out 1.1 acres of Roaded Natural (MA 1D) to be cut. However, neither the Figure 1 (page 7) map or any other EA map shows this cutting location. **We request** that the FS revise the EA documentation to disclose the location of the planned cut(s) listed on Table 3.

4. The Roadless Area Effects Analysis Table 2 (page 2) notes that: several of the Management Allocations listed allow for timber harvest in IRAs; the Draft EA would reopen Decommissioned Road R7840; and the Draft EA would log Northern Spotted Owl Critical Habitat.

COMMENT: We are particularly concerned about this project's proposal to conduct any timber harvest within IRA parcels that are also within a drainage that is accessed by a long-decommissioned road R7840 in Appendix A, Figure 3, and we request that the FS remove that proposal from the EA for all of the reasons listed below.

The proposed action to reopen R7840 in Chenuis Creek for the purpose of conducting non-commercial thinning is not adequately justified by the rationale found in EA documentation. The largest concentration of non-commercial thinning units in Chenuis Creek located in Section 36 (T18N-R7E), lie outside the IRA, may be justified given the size, concentration and proximity to the currently open road system (R7810).

However, there is no logical or compelling reason provided in the EA to reopen the entire 5.52 miles of decommissioned R7840 in order to access the several tiny areas of old cutting units for the purpose of conducting **non-commercial thinning** operations. This proposal appears to be a fiscally unsound management decision.

Furthermore, the area to be accessed and cut in Chenuis Creek is classified as Critical Habitat for the northern spotted owl by USFWS; see the 2012 Rule as modified by the 2021 Rule (Federal Register (77 FR 71876), as modified by <https://www.govinfo.gov/content/pkg/FR-2021-11-10/pdf/2021-24365.pdf>)

The size and extent of the proposed non-commercial thinning units appear unlikely to produce a measurable enhancement of critical habitat. This type of ground disturbing activity is expressly prohibited by Roadless Conservation Rule per CFR 294.11 (Fed Register page 3272 Vol 66, No 9 dated January 12, 2001) where road realignments or improvements impact threatened species. This direction is clearly applicable to the northern spotted owl that is dependent upon large undisturbed areas of land. We request that no NCT occur in the Critical Habitat of the NSO.

In addition, management allocations where timber harvest should not be planned per the LRMP, as amended by the NWFP direction, and certainly not within inventoried roadless areas and adjacent undeveloped lands that overlay the following LRMP Management Allocation Areas include the following:

MA15 in stands over 80 years old, MA 15 LSOG, MA 15 LSR in stands over 80 years old, MA 1B, MA 1B LSR in stands over 80 years old, MA 1D, MA LSOG, and MA LSR in stands over 80 years old.

We request the EA be revised to remove the above listed management allocations for timber harvest.

5. The Roadless Area Effects Analysis Table 3 (page 2) lists the acres of timber harvest that are proposed for the Clearwater IRA.

COMMENT: Given the sensitive nature of any such cutting within an IRA, we request that the CARLA EA disclose the expected economic benefits all such cutting will accrue to the local timber economy. The EA provides no such information. We request that the EA be revised to provide this rationale. For further information on this topic, see our comments at Section XV of this comment letter.

6. The Roadless Area Effects Analysis, Environmental Consequences of Alternative 1 (Pages 3-5); Impact on Critical Habitat of Northern Spotted Owl.

COMMENT: We question the degree of enhancement that the proposed non-commercial thinning in the upper 5 miles of the decommissioned R7840 will produce for the northern spotted owl. We request that such enhancement must be quantified to the greatest extent possible by way of scientifically applicable metrics. We request that this enhancement be weighed against the costs of reopening R7840, restoring the entire road segment to a “usable” standard to support the proposed activity. Then, after non-commercial materials are removed or treated to restore this road segment to its prior decommissioned state. If the “Wildlife Structure Enhancement” treatment areas fall outside of the depicted non-commercial thinning area, we request that the EA so state and place these treated areas on a relevant map.

7. The Roadless Area Effects Analysis, Environmental Consequences of Alternative 1 page 4 states

“The RACR provides exceptions to the prohibition on tree cutting in IRA where such activity is necessary “to improve threatened, endangered, proposed, or sensitive species habitat;” (294.13(b)1(i)) or “the cutting, sale, or removal of timber is incidental to the implementation of a management activity not otherwise prohibited.” (36 CFR 294.13(b)2).”

COMMENT: Neither the EA nor the Roadless Area Effects Analysis provide the necessary rationale to demonstrate that the proposed actions meet the referenced criteria that would allow an exception to the RACR (Roadless Area Conservation Rule) for tree cutting in the Chenus Creek portion of the Clearwater IRA (294.13(b)1(i)).

No evidence has been documented to show that “...such activity is necessary “to improve threatened, endangered, proposed, or sensitive species habitat.”” The degree of habitat enhancement cannot possibly exceed the area to be non-commercially thinned as shown on Figures 1, 3, and 4 of the Roadless Area Effects Analysis.

The above reference to an IRA exception by way of the proposed activity being “...incidental to the implementation of a management activity not otherwise prohibited...” is certainly not applicable to the proposed action in this EA. We request that the FS revise the Roadless Area Effects Analysis to delete the reference to this exception.

8. The Roadless Area Effects Analysis, Environmental Consequences, High quality or undisturbed soil, water, and air and sources of public drinking water (page 4).

COMMENT: While the ACS objectives are addressed as noted in the Roadless Area Effects Analysis, we note that the Hydrology Effects Analysis finds and provides the following cautions relative to water quality:

- (1) Page 21, That Temporary Roads in riparian areas pose the greatest threat to waters. **We request** that this project make every attempt to minimize the use of temporary roads, as noted elsewhere;
- (2) Page 24, Table 10A notes that 62% of the roads in the planning area are located within 300 feet of streams. This mileage of roads is rated as “very high” from a hydrology risk standpoint. **We request** that this project consider every opportunity to reduce this exposure to water quality degradation;
- 3) Page 26, Environmental Recommendation, The Hydrology Affects Report recommends *the most advantageous project action is to implement Alternative 2 for the roads package*. **We support this recommendation.**

9. The Roadless Area Effects Analysis, Environmental Consequences (page 4), compliance with the Aquatic Conservation Strategy.

COMMENT: One of the major objectives of the ACS is to enhance water quality by reducing the size of the Forest Road System. ACS objectives apply to this project planning area. Although this watershed is not a Key Watershed, it does include inventoried roadless areas and certainly Riparian Reserves along with at risk salmonids. See Record of Decision (ROD) for Amendments to Forest Service and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl, Standards and Guidelines, Basis for Standards and Guidelines pages B-11-34. In addition, watershed analyses should be updated as part of this project since conditions have changed since the original analyses were conducted. The reopening of a long-decommissioned road segment for the apparent purpose of improving northern spotted owl habitat by treating a tiny portion of a drainage in an LSR is contrary to the direction, if not the spirit, of the ACS. **We request** that the FS revise this section of the Roadless Area Effects Analysis so that the project does comply with the ACS.

10. The Roadless Area Effects Analysis Environmental Consequences (page 4) states

“Non-commercial Thinning: stands are dominated by small diameter trees and typically do not provide habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land.”

COMMENT: A review of the relevant maps (Figures 1, 3 & 4) shows that only a very small portion of the Chenuis Creek drainage, upstream of Section 36 (T18N-R7E), is covered by the noted small diameter trees. This fact is further confirmed by the mapping in Figure 5. Again, we question if a measurable degree of habitat enhancement may occur in this drainage if the proposed activities are carried out because of the very small area of non-commercial thinning. **We request** that the FS provide a detailed analysis of the specifics of habitat enhancement, and whether or not such habitat enhancement will be biologically meaningful for the creatures purportedly to benefit from such enhancement.

11. The Roadless Area Effects Analysis Environmental Consequences, Undeveloped Lands (page 6).

COMMENT: We thank the EA review team for researching, locating, and documenting un-inventoried and un-roaded lands on the Forest as noted in Figures 5 and 6. **We strongly recommend** that these 103 polygons (1972 acres) be formally recognized for their environmental value and documented in the next Land and Resource Management Plan update.

We request that these lands be treated as if they were formally inventoried as Roadless Areas and their roadless characteristics be preserved. Of particular value are those undeveloped parcels that are contiguous to the Clearwater Wilderness (Congressionally Withdrawn) and/or are contiguous to the Clearwater IRA (Inventoried Roadless Areas). We also note the concentrations of 'Undeveloped Lands (draft)' in Kennedy Creek, Chenuis Creek, Cedar Lake, and South Fork Prairie Creek. During the scoping phase of this project, we commented on these undeveloped lands.

12. The Transportation Effects Analysis (the "Transportation Effects Analysis") and the Roadless Area Effects Analysis, Environmental Consequences, Undeveloped Lands Figures 5 & 6 (pages 11 and 12).

COMMENT: The Transportation Effects Analysis does not provide a definition for "Unclassified Roads" that are shown in the Roadless Area Effects Analysis in Figures 5 and 6. In addition, the "Unclassified Roads" are not shown in Appendix A maps in Figures 1, 2, 3, 6, 7, and 10. **We request** that the FS revise the Draft EA:

- to provide a definition for "Unclassified Roads," including whether they are considered Forest System Roads and what their post project disposition will be; and
- to define and map which if any of these segments will be obliterated. For those obliterated segments, **we request** that the FS provide the method of treatment as noted for decommissioned roads noted on page 11 of the Transportation Effects Analysis.

13. The Roadless Area Effects Analysis, Figure 5, Undeveloped lands within the northern portion of the project area (page 11).

COMMENT: Figure 5 shows the “unclassified roads” in the northern portion of the project area. As part of the project **we request** that the FS ensure in the EA that at least these unclassified roads are fully obliterated: (1) Upper South Fork of Prairie Creek from FR7722; (2) Celery Meadows from FR7720; (3) Upper East Fork Prairie Creek from FR 7720.

14. In the Roadless Area Effects Analysis, the map at figure 5 shows roadside Buffers, as described on the key. However, the Buffers are not discussed in the text of the Analysis nor discussed in the Draft EA. The Key on the Map indicates that it applies to all roads. Why would buffers be applied for decommissioned roads and unclassified roads? It does not make sense to include buffers for roads that will get no future use. **We request** that the FS discuss and provide clarification in the EA as to the purpose of the buffers, and why they would apply to unused roads.

15. There is an internal conflict between the Project Design Criteria #B10 and Table 7 of the Botanical and Invasive Plants Effects Analysis as to the possible protection purpose of the buffers described above in Paragraph #14:

Table 7 of Botanical Effects Analysis, page 18:

"PDC B10 to retain roadside buffers would greatly reduce invasive establishment risk."

PDC B10, page 1:

"B10. Make all attempts to avoid placing gaps or openings within 50 feet of all system roads and within 100 feet of all property boundaries. For the first 500 feet (0.09 mile) along system roads entering National Forest System land from non-FS ownership, make all attempts to locate landings and temporary roads elsewhere."

PDC B10 does not describe roadside buffers and **we request** that PDC B10 be revised to address the issue stated in Table 7 of the Botanical Effects Analysis.

VI. Transportation/Roads Analysis

1. The Transportation Effects Analysis-Methodology (page 2) states

"The transportation assessment was developed using current road system data and travel planning results."

COMMENT: Currently decommissioned roads are not adequately described either in the text or in other the relevant figures (such as Table 4) of the Transportation Effects Analysis. The documented mileage which is shown in Table 4 of the Transportation Effects Analysis of existing decommissioned roads does not match the mileage of such roads shown in EA Table 8. **We request** that the FS revise all EA related documentation to account for all road segments

defined to be ML 0 in Table 4. FR 7840 segment length is documented in the EA (Table 8, pages 20-25) as 5.523 miles, a figure significantly different from 3.4757. **We request** that the FS revise the Transportation Effects Analysis for consistency and account for all decommissioned road segments for both 'existing conditions' as well as Alternatives 1 and 2.

2. The Transportation Effects Analysis-Methodology (page 3) states that

"Method for road recommendations was based upon this set or criteria. Determinations vary by project alternatives.

1. *Determine USFS immediate or long-term need, primarily for existing public use patterns & timber management Commercial Timber (CT) or Planned Precommercial Treatment (PPC) or access for private inholding or adjacent private lands....*

3. *If road was determined not to have any preexisting use or future use it was recommended for the objective of decommissioning and available with no project needs now or in the future.*

4. *If road was determined to have a project use with-in the approximately next ten years and no further future need it was recommended for decommissioning after proposed project use...."*

COMMENT: Per the above analysis criteria, **we request** that the EA document the noted criteria for each decommissioned road segment (ML 0) in the planning area.

In particular, **we request** that a detailed statement addressing each of the above criteria be developed and documented in the Final EA, particularly for FR 7840 in Chenuis Creek. Per criteria #3 and #4 in the above analysis, FR7840 does not have any preexisting use (decommissioned for 20+ years) and certainly no future use in more than ten years. Given the road recommendation criteria, it is unclear why this long-decommissioned road is proposed for reopening and then followed by re-decommissioning.

3. The Transportation Effects Analysis-Methodology (page 3) states that *"Method for road recommendations was based upon this set or criteria."*

COMMENT: We note that the above criteria do not address the NWFP management criteria for road management within Late Successional Reserves. Since Chenuis Creek is within an LSR as noted by EA Figure 1, NWFP Standards and Guidelines for LSR road management is applicable to the EA proposed action. Per the Record of Decision (ROD) for Amendments to Forest Service and Bureau of Land Management Planning Documents within the Range of the Northern Spotted Owl, Standards and Guidelines C-16, "Road Construction and Maintenance: *Road construction in LSRs for silviculture, salvage, and other activities generally is not recommended* [emphasis added] unless potential benefits exceed the costs of habitat impairment."

The Draft EA and related documentation clearly do not demonstrate that the potential benefits of habitat enhancement within the Chenuis Creek drainage exceed the costs of reopening

decommissioned FR7840 in the proposed action(s). By inspection, the treatment areas (non-commercial thinning units), upstream of Section 36 (T18N-R7E) as shown in Figures 2, 3, 6, & 7 of Appendix A, are small relative to the area of NFS lands within the Chenuis Creek drainage. No credible cost-benefits analyses have been provided, and certainly no costs have been assigned to the reopening of a long-decommissioned road, reconditioning the reopened road, and then restoring FR7840 to its previously decommissioned status.

We request that the FS revise the Draft EA and all relevant documentation to provide the called for analyses.

4. The Transportation Effects Analysis-Cumulative Effects Boundaries (page 4) states that

"Cumulative effects analysis area is the Carbon River project area which includes roads within the project area, and road segments outside of the project boundary that were identified for access for implementation onto roads included federal, county, and private land."

COMMENT: One of the most significant road segments in the project area is Chenuis Creek FR7840 and its reopening for non-commercial thinning is not addressed in the EA documentation for cumulative effects. This road effectively produces an increase in fragmentation of wildlife habitat (critical habitat for the northern spotted owl) between Mt Rainier National Park and the Clearwater Wilderness. **We request** that these effects be evaluated and addressed.

5. The Transportation Effects Analysis-Known Road Issues in project area... (page 4)

COMMENTS: The proposed action of reopening a long-decommissioned road is certainly controversial. This issue was submitted as a major issue during the scoping phase of this project but subsequently ignored in the EA and related documentation.

We request that all relevant EA documentation be revised to address the environmental effects of reopening FR7840. Reopening a long-decommissioned road on NFS lands that is part of the ecological complex made up of Mt Rainier National Park and six immediately adjacent or contiguous NFS Wilderness Units (Clearwater, Norse Peak, WO Douglas, Tatoosh, Glacier View and Goat Rocks) is not an action to be taken lightly. **We request** that the FS fully address this issue.

We request that the Final EA includes an inventory of the current number of FS road culverts that block fish passage within the project area. These identified culverts must be either replaced or repaired as an integral part this project. The Final EA must include the schedule for these road culvert repairs and/or replacements.

We request that the FS identify the existing roads with the highest potential for erosion and watershed damage within the proposed project area. The Final EA must document and schedule all actions necessary to repair those high-risk roads. **We also request** that the FS prepare road sediment loading studies relevant to the proposed project. **We also request** that the FS identify creeks, streams, or rivers whose water quality has been adversely impacted by sediment runoff from the FS road system, and take all necessary action to limit sediment runoff from the FS road system.

6. The Transportation Effects Analysis-Consistency with Relevant Laws, Regulations, and Policies. The Transportation Effects Analysis states on page 4 "*Transportation proposal implementation would meet Unit-wide and management specific requirements.*"

COMMENT: The proposed action is inconsistent with the spirit of NWFP ROD for Standards and Guidelines on page C-16 since the EA proposes to reopen a 5.52-mile segment of decommissioned road within an LSR that is contiguous to a National Park and a NFS Wilderness Unit. Since FR7840 is now decommissioned and has been so for 20+ years, the effect of the proposed action is to essentially construct a new road in an LSR. In addition, the stated intent of proposed treatment is to improve critical habitat for northern spotted owls when the area to be treated makes up a very small portion of the drainage. This drainage is in a critical location, situated between a National Park and a NFS Wilderness. The proposed action could produce adverse effects on wildlife in the area and **we request** that the proposed action be evaluated for cost effectiveness and an inventory of adverse effects on wildlife. **We request** that the FS revise the EA and associated documentation accordingly.

7. The Transportation Effects Analysis-Environmental Impacts, Road Costs (associated with commercial thinning) (Page 9).

COMMENT: The transportation effects document is incomplete since it does not deal with road costs associated with *non-commercial thinning* (emphasis added). One of the major issues with this landscape analysis plan is the reopening of the long-decommissioned FR7840 in Chenuis Creek, then re-decommissioning this 5.52-mile road segment. **We request** that the EA be revised to address all costs of reopening, reconditioning (to accommodate non-commercial thinning), and then re-decommissioning FR7840.

8. The Transportation Effects Analysis-Environmental Impacts, Temporary Roads (pages 9 & 10). The Transportation Effects Analysis states

"To facilitate harvesting systems of timber stands away from open roads, Action Alternatives would use temporary road miles listed in Table 7."

COMMENT: Neither Table 7 in Transportation Effects Analysis nor Table 7 in the EA specifically list road segments that would be used as temporary roads to facilitate harvest systems. **We request** that the FS revise the Transportation Effects Analysis and/or the EA to provide a list of all road segments that would be used to support harvest systems as temporary roads.

Temporary roads are most likely to produce adverse effects on watershed health as noted in the Hydrology Effects Analysis. **We request** that the reduction of planned temporary roads be made a priority for the CARLA project.

9. The Transportation Effects Analysis-Environmental Impacts, Temporary Roads (page 9). The Transportation Effects Analysis states

"The proposed action would utilize existing unclassified roads and previously decommissioned roads on a temporary basis and build new temporary roads for timber harvest restoration related activity."

COMMENT: Utilizing existing unclassified or decommissioned roads or building new roads to facilitate timber harvest activities must not result in a *de facto* expansion of the Forest Road System. **We request** that there be no *de facto* expansion of the Forest Road System.

We request that all temporary roads that (1) utilize unclassified roads or (2) utilize previously decommissioned roads or (3) new temporary roads, be decommissioned as an integral part of this timber sale. We do not support expanding the mileage of OHV/ORV routes by the conversion of temporary roads for motorized use. **We request** that the FS limit in the Final EA such conversions to the greatest extent practicable.

10. The Transportation Effects Analysis-Environmental Impacts, Description of Road Work-Temporary Roads (page 10). The Transportation Effects Analysis states

"Some roads needed for harvest operation are designated as temporary roads. Temporary roads are not intended to be a permanent part of the road system and would be obliterated and blocked after use. Temporary roads include unclassified road prisms some of which were previously decommissioned and legacy roads remaining in the landscape from unknown time frame which are intended to be used for this project and then obliterated through timber sale contract terms."

COMMENT: **We request** that the FS revise the EA to describe in detail how the quoted direction will apply to FR7840 in Chenuis Creek at the conclusion of the proposed non-commercial thinning activity.

11. The Transportation Effects Analysis-Environmental Impacts-Road Decommissioning (page 11). The Transportation Effects Analysis lists a suite of decommissioning options for how roads that are to be decommissioned will be treated *"(Blocked, CMPs removed, Recontoured, Unstable slope removed, Revegetated, Waterbared/Outsloped.)"*

COMMENT: Given the controversial nature of the reopening of FR7840, **We request** that the FS revise the EA and relevant documentation to define (1) which decommissioning elements will be removed or reworked in order to allow FR7840 to support the proposed EA actions and (2)

which decommissioning elements will be utilized in order to ‘re-decommission’ this 5.52-mile road segment and restore this road to its pre-project condition. **We request** that the FS provide similar information in the Final EA for all road segments to be decommissioned as noted in EA Table 8 (pages 20-25).

12. The Transportation Effects Analysis-Environmental Impacts, Roadside Vegetation Management (Page 12). The Transportation Effects Analysis states that roads maybe widened for timber hauling.

COMMENT: **We request** that the EA provide its best estimate for which road segments will require widening to support timber harvest. By example, will FR7840 require widening? **We request** that the FS describe in the Final EA any such widening action.

13. The Transportation Effects Analysis-Direct and Indirect Effects, Tables 5 and 6 (Pages 15 and 16). Tables 5 shows Alternative 1 Operational Miles for Decommissioned roads to be N/A.

COMMENT: **We request** that the FS explain in the Final EA why Decommissioned Roads are noted as N/A for Operational Miles in this Table. The Objective Miles for Alternative 1 lists 17.5290 miles for Decommissioned roads. **We request** that this data table be revised to refer to the Draft EA Table 8 that provides the detailed list of the 17.5290 miles of road segments to be decommissioned. **We request** that the FS make the same changes for Table 6 on page 16 for Alternative 2.

14. Carbon River Landscape Analysis EA, Transportation System (page 17). The EA refers to “unclassified or abandoned road grades”.

COMMENT: Neither the EA nor the Transportation Effects Analysis provide a definition for what constitutes a “unclassified roads,” yet “unclassified roads” are shown in the Roadless Area Effects Analysis in Figures 5 and 6. **We request** that the FS revise the EA to add a description of what constitutes an “unclassified road.”

VII. Bridge Analysis - Forest Service Road 78 and 7810 Bridge

Both Forest Service Road 78 and the 7810 bridge are located in an environmentally sensitive area of the Carbon River floodplain, and serve as an important gateway to Mt. Rainier National Park and the Clearwater Wilderness, respectively. Both are adjacent to areas of ecological significance, with the road bordering, and at times passing through, Late-Successional Old-Growth Forest, and the bridge crossing the Carbon River, characterized in the Draft EA as “the most productive salmonid habitat in the Puyallup Basin,” (Draft EA p.63). The proposed project area encompasses up to 49 acres that potentially includes old growth trees “*suitable for nesting*,” (Draft EA, p. 55).

Given the ecological sensitivity and importance of this area, it is critical that extra care and due diligence be exercised in evaluating and addressing all of the environmental issues before moving forward with any of the Action Options, regardless of which one is selected. In addition, public involvement should be an integral part of this process. Please see our comments on the need for a Supplemental Environmental Assessment under Section IV of this Comment Letter.

In addition, as Late-Successional Old-Growth forests are governed by the rules for Late-Successional Reserves (NWFP Standards and Guidelines, p. C-9), and the road is adjacent to the LSOG, with a small section passing through it, **we request** that careful consideration be given in the Final EA to the NWFP Standards and Guidelines for road construction and maintenance in Late-Successional Reserves. Those guidelines state:

"Road construction in Late-Successional Reserves for silvicultural, salvage, and other activities generally is not recommended unless potential benefits exceed the costs of habitat impairment. If new roads are necessary to implement a practice that is otherwise in accordance with these guidelines, they will be kept to a minimum, be routed through non-late-successional habitat where possible, and be designed to minimize adverse impacts. "(NWFP Standards and Guidelines, p.C-16)

Further, **we request** that any future project respect the natural values of the area and be managed with as light-handed an approach as possible, blending into the surrounding landscape, as required by the LRMP guidelines for Roaded Natural (p.4-166).

The Sierra Club acknowledges the difficulty of making a final decision as to which of the two options to choose given the uncertainty over future access due to the closure of the Fairfax Bridge. However, we have significant concerns about the Condition-based Management (CBM) approach proposed in the Draft EA to determine which option is ultimately selected.

Specifically, our concerns with Condition-based Management include:

- Lack of clarity about the decision-making timeline and process
- Absence of any information about further environmental review
- Failure to include public involvement in the process

Given the significance of the work involved, especially if Option 1 is selected, and potential environmental impacts to this sensitive area, **we request** that there be a Supplemental Environmental Assessment (the "SEA") which would address our concerns with CBM, and address the needs for this sensitive area. **We request** that this Supplemental Environmental Assessment include, but not be limited to:

- 1) soils analysis,
- 2) engineering analysis,
- 3) geotechnical analysis,
- 4) analysis of environmental effects relating to vegetation and wildlife habitat, and

5) an inventory of all trees in the 49 acres that are 80 years of age or older, and all trees in the 49 acres that are 20" DBH or larger.

We request that this SEA should comply with the NWFP and the LRMP, as well as all applicable statutes and regulations, and include public involvement and participation, in compliance with NEPA.

Our specific concerns about Option 1, the proposed rerouting of FSR 78 and extension of the 7810 bridge, are as follows:

Potential cutting of old growth trees for the Bridge Options

For Option 1, the Draft EA, Page 55, states the project:

"Would potentially remove up to 43 acres of older mid-seral and 6 acres of younger forest. LiDAR and imagery suggest that large trees suitable for nesting may be affected" (p.55)

In accordance with our earlier comments on cutting trees over 20-inch DBH, and those that are more than 80 years old, **we request** that the Forest Service must comply with all of the terms and provisions of REO Memo 694, dated July 9, 1996 as further discussed under Section X subsection A of this Comment Letter.

We request that the Forest Service conduct an inventory of all trees over 80 years old and trees over 20-inch DBH in the project area, and make all efforts to modify the road, or if Option 2 is selected, the trail, to avoid those trees.

Soil and hydrology impacts for the Bridge Options

The rerouting of the road proposed under Option 1 raises several significant hydrology and soils issues, as both road construction and the new road would encroach upon an environmentally sensitive area of wet habit and potential wetlands. Page 14 of the Carbon River Vegetation Management Project Soil Resource Effects Analysis states:

*"The Sunbeam component comprises 20% of the unit and is the wettest, with a seasonally high water table of less than 25 cm depth. **These have the potential for being wetlands and any road work would necessitate delineating and avoiding these wetland areas.**"* [emphasis added]

In addition, the Soil Resource Effects Analysis states on page 14:

*"Tokaloo soils compose 55% of the unit and have a seasonally high water table greater than 25 cm depth. This degree of wetness is insufficient to meet the regulatory definition of a wetland but **would pose significant issues with road construction and***

***maintenance.** Any road construction in this area that cannot avoid these wet areas would need to be engineered to compensate for soil moisture and would most likely require additional maintenance costs.”* [emphasis added]

In contrast, the Hydrology Effects Analysis notes that Option 2, instead of Option 1, would avoid these negative impacts. Page 5 of the Hydrology Effects Analysis states:

“Option two would remove the interaction of costly infrastructure within the floodplain and allow natural migration of the river.”

We request that the FS give preference to Option 2, based on the Hydrology Effects Analysis.

Habitat and Vegetation Impacts for the Bridge Options

While the Draft EA notes that there are no identified Sensitive or Survey & Manage species in the area of the road reroute and bridge extension, the wet habitat and adjacent old growth forest make it conducive to species in those categories (Draft EA p. 45). This area may be relatively small, but page 13 of the Carbon River Vegetation Management Project Botany and Invasive Plants Effects Analysis states:

“This relatively small loss of potential habitat compounds with climate change effects of increasing risks of fire, disease, and insect outbreaks in late-successional forests, which will decrease the availability of this potential habitat in the long-term (Raymond et al. eds. 2014).”

If Option One is selected, **we request** that field surveys be conducted as specified in the Draft EA to determine if there are Sensitive or Survey & Manage species within the project area (as analyzed in the Draft EA, Table 19) and follow management recommendations according to Survey & Manage Management Recommendations for each species.

We request that these surveys also follow the NWFP Standards and Guidelines, for Multiple-Use Activities Other Than Silviculture, Protection Buffers. Page C19-C20 states:

“Protection Buffers are additional standards and guidelines from the Scientific Analysis Team Report for specific rare and locally endemic species, and other specific species in the upland forest matrix. The following rare and locally endemic species are likely to be assured viability if they occur within reserves. However, there might be occupied locations outside these areas that will be important to protect as well. Protocols for surveys will be developed that will ensure a high likelihood of locating these occupied sites, and such surveys will be conducted prior to ground-disturbing activities within the known or suspected ranges and within the habitat types or vegetation communities occupied by these species, according to the implementation of these standards and guidelines schedule for Survey and Manage components 1 and 2 on pages C-4 and C-5”

In addition, **we request** that the Forest Service to update or supplement the existing Watershed Analysis for the project area as required by NWFP Standards & Guidelines. Page A-7 of the Standards and Guidelines state:

“As described elsewhere in these standards and guidelines, watershed analysis is an ongoing, iterative process. Watershed analyses will expand as appropriate to consider additional available information, changing conditions and potential effects associated with long-term management issues and needed actions”

A further concern about road construction under Option 1 is the negative impacts it could potentially have on wildlife. Page 55 of the Draft EA states:

“Road construction can impact wildlife by removing habitat, creating edges, and increasing human activity, which may lead to vehicle-wildlife collisions. Heavy equipment could cause direct mortality to less mobile species, such as salamanders and mollusks, and damage nests or overwintering sites of species like bumblebees.”

All of the concerns outlined above about the potential negative impacts to this sensitive area substantiate the need for further, careful environmental analysis, and specifically for a Supplemental Environmental Assessment.

VIII. Fuel Management:

The Sierra Club strongly disagrees with any blanket approval of prescribed fire in either Administratively Withdrawn Areas, including Inventoried Roadless Areas, or Congressionally Reserved Areas, or any other LUA where logging is not now permitted, and **the Sierra Club requests** that the Environmental Document not include any such approval.

The Sierra Club supports restoring the natural role of wildland fire in backcountry areas – where the bulk of Congressionally Reserved Areas in the National Forest are located – and monitoring wildland fires to ensure the safety of communities

Regarding the target of 200 ft wide burns along roads in commercial units, **we request** that an analysis be made of whether or not Best Science justifies the 200 ft target. **We ask** that the FS consider whether or not a narrower target be sufficient for protection. As proposed, the burns would create a 400-foot wide swath of burn along targeted roads, which seems excessive for their purposes. As it is, it is well known that targeted burns cannot guarantee that those burns are placed in areas where future fires will occur, whether they be wildfire or ignited by humans in violation of applicable law, rules and regulations. And it is well known that clearing forest of undergrowth and trees causes the ground to dry out and contribute to intensity of future fires.

Because hunting, target shooting, and ricochets are also responsible for starting fires, what will the FS do to close areas to hunting or target shooting during times of high fire risk?

In addition, **we request and urge** that protecting forest communities and infrastructure (buildings, power lines, hydro power facilities, communication sites) and along strategic road systems located in the Carbon River area should be the primary target of prescribed fire rather than targeting all roads in commercial units and targeting entire units in noncommercial units.

We request that the following sentence, found on page 12 of the Draft EA, be added to the description on page 12 of the prescribed burns for *non-commercial units*:

"Roads that would be closed to public use or decommissioned during the project would not receive roadside fuels reduction treatments."

As that sentence provision was appropriate for the *commercial units*, **we request** that the provision be added to the description for the *noncommercial units*.

In addition, **we request** that the Environmental Document provide that IRAs do not receive roadside fuels reduction treatments, regardless of whether or not bounded by roads.

Several questions are not addressed in either the Draft EA or the Fire, Fuels, Air Quality Effects Analysis regarding the effects of prescribed fire or cultural fire:

- what will be proposed regarding prescribed fire or cultural fire in Riparian Reserves and Buffers, i.e. either the 200 ft width in Commercial units, or unit wide prescribed burns in non-commercial units?
- what will be required for prescribed fire or cultural fire in high elevation lands vs low elevation lands?

We request that the FS answer both of these questions in the Final EA.

in addition, **we object and request** that the FS remove the proposal for prescribed fire or thinning along FS roads or within NCT units on Road 7726, near Celery Meadows, as such fire or thinning is quite near to, and almost adjacent to, the Wilderness Boundary for the Clearwater Wilderness. We also note that the proposed prescribed fire or thinning along FS roads or within NCT units on Road 7726 is quite near and perhaps adjacent to Inventoried Roadless Areas in the vicinity, and **we request** that such proposal be removed from the Final EA. **We have the following additional requests:**

- please provide a detailed analysis and explanation as to whether or not Road 7726 will receive prescribed fire or thinning along FS roads or within NCT units.
- we note that Road 7726 does not get significant traffic and does not seem to meet the egress criteria listed in the Scoping Letter for the location of prescribed burns and thinning along FS roads or within NCT units; please provide a detailed explanation. Certainly, the proposed prescribed fire or thinning along FS roads or within NCT units in the Evans Creek area have more significant traffic and are part of egress traffic plans.

- Please provide detailed analysis on how the action to create the Road 7726 prescribed fire or thinning along FS roads or within NCT units will protect and not adversely impact the Clearwater Wilderness or IRA lands in the area of the prescribed fire or thinning along FS roads or within NCT units.
- Please provide a detailed map of all proposed prescribed fire or thinning along FS roads or within NCT units, including linear distances from the Clearwater Wilderness, adjacent IRAs, and Undeveloped lands.
- Please provide a detailed map that shows the location in the Project Area of clearing swaths such as the 200ft wide swaths proposed along roads in the proposed project and prescribed burns of entire units, as described in the proposed project implemented since the 1990 MBS LRMP.
- Please provide a database showing how many acres and miles of prescribed fires have been implemented in the Project Area since the 1990 MBS LRMP.
- Please provide any maps depicting the location of existing and future firebreaks in the Project Area.

We request that answers to all of the above questions be addressed in the Environmental Document.

We are pleased to see that salvage harvest is not proposed for the fuel treatments.

IX. Riparian Buffers

We understand that the *USDI Fish and Wildlife Service 2025 Programmatic Biological Opinion for Timber and Routine Activities on the Western Washington Restoration and Collaboration Zone* ("WWCRZ 2025 Bio Op") has been established as the source of determining the width and locations of No Cut buffers within Riparian Buffers. See page 11 and 12 of the Fisheries Effects Analysis.

We look to the FS to ensure compliance with both the No Cut buffers and the Riparian Reserve restrictions under both the NWFP and the WWCRZ 2025 Bio Op on all harvests and fuel treatments in the Riparian Reserves.

X. Specific Tree Issues

A. Cutting trees over 20-inch DBH

We demand that the Forest Service must comply with all the terms and provisions of REO Memo 694, dated July 9, 1996, regarding cutting of trees over 20" DBH. We quote the relevant terms and provisions of the REO Memo 694 after we discuss the Draft EA language. Here is the Draft EA language on page 33:

*"Depending on the diameter distribution and growth of some stands, for thinning to be effective in accelerating the development of large diameter living trees and a multiple canopy layer, more than an incidental cutting and removal of >20" DBH trees may need to occur. Should this be needed, a **project-level consistency review by the Regional Ecosystem Office would be conducted** and would be fully disclosed when **plantation stands are scoped for public comment.**"* [emphasis added]

In addition, on page 9 of the Draft EA, is the following:

*"Alternative 1 includes an exemption from the Regional Ecosystem Office (REO) for LSR to remove trees up to 24" DBH where trees over 20 inches in diameter at breast height (DBH) **are abundant**. This would better meet the **treatment objective of 35% of SDI max** in thinned areas to reduce stand density and accelerating old growth development."* [emphasis added]

However, the REO Memo 694 provides explicitly that the Stand Attributes, on page 4 of the Memo (REO review exemption criteria), must be met together with **all other conditions** of the Memo, including the following:

*"2. West of the Cascades outside of the Oregon and California Klamath Provinces, the basal-area-weighted average age of the stand is less than 80 years. Individual trees exceeding 80 years in those provinces, or exceeding 20-inches dbh in **any** province, shall not be harvested except for the purpose of creating openings, providing other habitat structure such as downed logs, elimination of a hazard from a standing danger tree, or cutting minimal yarding corridors. Where older trees or trees larger than 20-inches dbh are cut, **they will be left in place to contribute toward meeting the overall CWD objective**. Thinning will be from below, except in individual circumstances where specific species retention objectives have a higher priority. Cutting older trees or trees exceeding 20-inches dbh for **any** purpose **will be the exception, not the rule.**"* [emphasis added]

There are two points for which the Draft EA does not meet the above provided requirements of the REO Memo 694:

- 1) How to define 'abundant', as that concept is not included, either by definition or in the permitted parameters, in the REO Memo; and
- 2) 'SDI max' is not included in the permitted parameters in the REO Memo.

Neither does the Draft EA include the stipulations included in the REO Memo 694. The Draft EA does not meet the REO Memo 694 requirements.

We request that the draft EA be revised to *remove the two provisions listed above, and we request that the FS comply with* the restrictions provided in REO Memo 694 on cutting any trees greater than 20-inches dbh through this project.

We request that all documents for any waiver requested from the REO, including initial application as well as final decision, be fully disclosed and posted on the Project Website.

B. Date at Which Age of Stands is Determined

Page 9 of the Draft EA states:

*"Stands 80 years or older at the time of **implementation** would not be harvested."*
[emphasis added]

However, **we request** that the 80-year age determination be made ***as of date of cutting***. The word 'implementation' has no reference as to what time it refers to and could be any time from the date of the EA Final Decision, to the date of awarding a timber contract or stewardship contract, to the date of starting a contract, to the date of cutting. Given that the focus of the restriction is to protect stands 80 years or older, the only way to provide that protection is to have the determination made when cutting starts.

In addition, **we request** that legacy or remnant individual trees that are over 80 years of age and located in a younger stand be protected and not cut as those legacy or remnant individual trees would have ecological significance for wildlife.

C Protect Naturally Regenerated Stands; and Habitat Enhancement by topping of trees to protect and create cavities and protect nest platforms

We request that the Final EA clarify that commercial thinning treatment is only applicable for *replanted harvested plantations*, and **does not include naturally regenerated stands** which originated from disturbances caused by fire, or windthrow or other natural phenomena such as landslides. **We request** that naturally regenerated stands, even if surrounded by replanted plantations, not be cut.

Regarding Habitat Enhancement, Page 16 of the Draft EA provides:

"Where cavity promotion is the primary objective, topping would be the preferred method and would select larger (generally 18-24" diameter) trees where available..."

"topping trees and leaving one or more live limbs for a secondary top to form over the platform.

We request that the Environmental Document be revised to provide Best Available Scientific Evidence that topping trees for cavity promotion, and topping trees and leaving a secondary top, will

- actually assist in creating cavities; and
- actually works for forming a secondary top to form over nesting platforms; and
- does not impact the health of the topped trees.

D. 'Average' Tree Size:

The Draft EA provides on page 11 the following:

"Non-commercial hand thinning would occur in stands where the average tree size is below merchantability (generally, average size below 9" DBH) or where commercial harvesting is not cost-effective."

We request that the EA define DBH limits in terms of maximum diameter rather than in terms of 'average' size and DBH, as using an 'average' could readily result in cutting of trees which exceed 20 inches DBH..

See discussion previously in this Comment Letter regarding the REO Memo 694 which prohibits cutting trees over 20 inches DBH.

We appreciate that Page 9 of the Draft EA states:

"When implementing treatment in LSR, careful consideration would be made to leave as many stand components directly related to late-successional development as possible, including large broken and diseased trees important for snag recruitment, nesting habitat, and large snags or logs. Variable density thinning provides an opportunity to combine other prescriptive elements such as increased thinning around selected trees to enhance rapid development of larger trees, and to develop larger branch systems favored as a wildlife objective (Franklin et al., 2018)."

We request that the FS include arborists, botanists and biologists to assist in making the best possible determinations of treatment in LSRs so as to meet the NWFP and the MBS LRMP goals for habitat development of LSRs for late-successional species. **We request** that the EA clarify if this prescription applies LSRs or LSOG or both.

The EA documents only 18 acres of commercial thinning in LSR in Table 4 (page 10) and Table10 (page 29) for the North-South Prairie Creek Area. **We request** the following:

- The EA should verify that only 18 acres of commercial thinning is planned for LSR in the North-South Prairie Creek Area of per Table 4 and Table 10; and
- The Appendix A maps must be revised to show these commercial thinning cutting units.

The EA Tables 4 and 10 call out commercial thinning areas to the extent of 2741.5 acres as being located in Late Successional Reserve in South-Evans Creek. We find these cutting units are not in LSR, but in LSOG per the Appendix A maps. **We request** that the EA document the regulatory and/or planning authority for such cutting in the LSOG land allocation. **We request** that the FS verify that any cutting is allowed.

E. Additional Tree Mapping and Prescription issues

1. Note: Page 38 of Draft EA Non-commercial Thinning Under Alternative 1, approximately 83 acres in Inventoried Roadless Areas (IRA) and 965 acres in LSR and Matrix LUAs would receive non-commercial thinning (NCT). However, the Appendix A maps only show NCT in LSR. **We request** the following:

- The EA be revised to call out NCT acres to be treated in Matrix and then separately call out NCT acres for LSR.
- If some NCT is planned for LSOG, these acres must also be separately specified.

We request that this inconsistency be resolved in the Final EA.

2. Carbon River Landscape Analysis EA, Purpose and Need, Late Successional Reserves, Table 4, Commercial Harvest Thinning in Alternative 1 (page 10). Table 4 lists 18 acres of Commercial Harvest Thinning in LSR.

COMMENT: A Review of Appendix A maps in Figures 2, 3, 6, 7, and 10 shows no variable density thinning or no variable retention harvest in the only LSR LUA within the project area. If tree cutting other than non-commercial thinning is planned for any alternative within the LSR, **we request** that the FS revise all applicable Appendix A maps to show these cutting units. **We request** that if some NCT is planned for LSOG, these acres must also be separately specified and mapped.

3. Carbon River Landscape Analysis EA, Commercial Harvest Thinning, Late Successional Reserves, Table 10, Commercial Harvest Thinning in Alternative 2 (page 29).

COMMENT: A Review of Appendix A maps in Figures 2, 3, 6, 7, and 10 shows no variable density thinning or no variable retention harvest in the only LSR LUA within the project area. If tree cutting other than non-commercial thinning is planned for any alternative within the LSR,

we request that the FS revise all applicable Appendix A maps to show these units. **We request** that if some NCT is planned for LSOG, these acres must also be separately specified and mapped.

4. Carbon River Landscape Analysis EA, Late Successional Reserves, Table 4 (page 10) and Table 10 (page 29), refer to commercial harvest thinning acres in LSR in Evans Creek.

COMMENT: A review of the NWFP LUAs as shown in Appendix A Figure 1 shows that LSRs are only present within the planning area in Chenuis Creek. No LSR acres are present in Evans Creek, only LSOG. The greatest share of the planning area that is designated LSOG MA is located within Evans Creek. **We request** that the EA and related documentation be revised to explicitly state that the LSOG MA is to be managed in the same way as an LSR, if this is the case. **We request** that the EA document this identical direction in the explicit terms of the NWFP Standards and Guidelines, if such authority is in place.

XI. Analyze Historic and Proposed use of Pesticides and Herbicides in the Carbon River Area

We request that the FS provide in the Final EA a list of the quantity and names of all pesticides/herbicides used by the FS as part of its roadside vegetation management program since the 1990 MBS LRMP.

We request that an EIS be prepared that includes a quantitative and qualitative analysis of pesticide/herbicide use proposed by the Forest Service that includes 1) a listing of past pesticide/herbicide used annually since the MBS LRMP was adopted in 1990, and 2) the projected use over the future lifespan of this project.

XII. Wildlife habitat and connectivity.

The Project has unacceptable impacts on wildlife connectivity. The impact of a 400-foot wide clear zone (i.e. both sides of roads in commercial units), as well as prescribed burns in entire units of noncommercial treatment, will have substantial impact on wildlife, especially those that are dependent on late-successional forests – some of which are listed under the ESA. Roads already have degraded and split habitat areas and had high impacts on dispersal of LSOG species. This project will exacerbate that situation. **We request** that the FS discuss the impact of this project on wildlife connectivity, and on the viability of populations impacted by interference with connectivity corridors.

We request that the EA mapping be revised to show FS identified wildlife connectivity corridors within the proposed project area.

We request that the EA be modified to discuss whether or not the FS has inventoried populations of reptiles and amphibians within the proposed project area. If the FS has conducted such inventories, the EA should discuss whether or not these populations increased or decreased since the 1990 MBS LRMP.

XIII. Regarding fisheries

We request that the FS ensures that the proposed actions do not adversely affect threatened or endangered fish stocks in the Carbon River project area. Reviewing the Fisheries Effects Analysis dated 2/14/25, we note that in addition to the Section 7 ESA consultation and concurrency request, there are several important references to salmonid habitat and species, and ecological functions of the Carbon River, as follows:

Page 3:

*“Project Consistency: The project incorporates a number of project design criteria intended to conserve and protect aquatic resources. See EA Appendix B for specific soil, water and fisheries design criteria. The project area includes occupied habitat and designated critical habitat for Federally listed fishes. **Therefore, project level Endangered Species Act Section 7 consultation will be done for the preferred alternative** (the alternative in NEPA that the Responsible Official selects) utilizing the Timber and Routine Activities on the Western Washington Restoration and Collaboration Zone Forest Programmatic (2025).”* [emphasis added]

Page 8:

“The Carbon River is considered the largest and most production habitat available for salmonids in the Puyallup basin... The Puyallup-White River basin supports the last remaining Spring Chinook Salmon run in South Puget Sound... Of the fishes that reside in the greater Carbon River watershed, Chinook salmon, steelhead trout and bull trout are Federally listed under the Endangered Species Act (ESA). Pacific lamprey have not been sampled in the mid-upper basins of Carbon and Mowich rivers (USDI 2022), however it’s conceivable that suitable habitat may exist. (Salmon Habitat Recovery 2018).” [emphasis added]

Page 11:

*“The Proposed Action (Alternative 1) would commercially treat an estimated 4,633 acres of timber stands of which would potentially include **2,028 acres in Riparian Reserves.**”* [emphasis added]

Page 15:

*“It is my determination the Carbon River Landscape Analysis Project may affect and **is likely to adversely affect** PS steelhead trout for Alternatives 1 and 2. The project may affect and **is likely to adversely affect** PS steelhead trout designated critical habitat for Alternatives 1 and 2. [emphasis added]*

It is my determination the Carbon River Landscape Analysis Project may affect and is likely to adversely affect PS bull trout for Alternatives 1 and 2. The project may affect and is likely to adversely affect PS bull trout designated critical habitat for Alternatives 1 and 2.” [emphasis added]

We look forward to reviewing the Concurrency Analysis by USFWS that will be obtained by the FS regarding the indicated species and their designated Critical Habitats in the Project Area. We request that the FS post the application documents as well as the Concurrency Analysis on the project website.

In addition, we note that Tables in the Fisheries Effects Analysis disclose miles of habitat in the project area, but not any base-line fish data. We request that the Forest Service present baseline quantitative population numbers on each fish species, as well as any trends over the last 30 years, as part of the Environmental Document.

We request that the FS identify in the Final EA which fisheries species in the project area have declined to date, using the implementation of the MBS LRMP in 1990 as the baseline.

XIV. Wildlife effects

We note the following from the Wildlife Effects Analysis dated 2/14/25:

Page 6

“The project May Affect, Likely to Adversely Affect the Marbled Murrelet and Marbled Murrelet Critical Habitat, Northern Spotted Owl and Northern Spotted Owl Critical Habitat.

These preliminary “May Effect” determinations trigger the need for Section 7 consultation with the USFWS. These will be analyzed and documented through programmatic consultation documents (Project Consistency Evaluation Form) or in a separate Biological Assessment (BA), as appropriate, and will be submitted to the USFWS once the preferred alternative for action is selected.”

We look forward to reviewing the Concurrency Analysis by USFWS that will be obtained by the FS regarding these “May Effect” and “Likely to Adversely Effect” determinations regarding the Northern Spotted Owl and the Marbled Murrelet, and their designated Critical Habitats. We request that the FS post the application documents as well as the Concurrency Analysis on the project website.

We request that the FS in the Final EA identify which wildlife species in the project area have declined to date, using the implementation of the MBS LRMP in 1990 as the baseline.

XV. Economic Effects Analysis:

1. Carbon River Landscape Analysis EA, Direct and Indirect Effects, Economics (Page 39).

COMMENT: The EA discussion of economics is narrowly focused and does not answer questions about the potential economic effects of this timber sale on the local economy, particularly the area of the eastern Puget Sound counties of Washington State. **We request** that the EA include the following:

- a. how would the CARLA project impact the timber supply volume in the context of all ownerships in Eastern Puget Sound?
- b. disclosure of the volume of logs that will be removed from the project planning area for each of the 30 years of the projected length of time this timber sale will be active.
- c. if the sale is expected to be inactive for certain periods of time during the 30 years, the EA must provide this information.
- d. an analysis of the direct effects generated by this proposed timber sale in numeric terms that estimate number of jobs in each timber sector (forestry, logging, wood products manufacturing, paper manufacturing). This estimate should include the period of time these jobs would be generated.
- e. the analysis must then evaluate the numeric effects, estimated above, that this proposed sale would have on the total employment of all economic sectors in the relevant eastern Puget Sound Washington Counties, particularly Pierce County

Our research shows that timber sectors in Pierce County Washington supported about 0.9% of the total wage and salary jobs in the County in 2023. Furthermore, total growth in Pierce County added over 150,000 new jobs since 2000, while timber contracted by about 1500 jobs.¹

Since the Mt Baker-Snoqualmie National Forest timber program supported less than 1% of the Pierce County timber supply (measured by volume) during the period 2018-2022², it would appear the potential economic effects of this proposed sale would be very small.

¹ <https://headwaterseconomics.org/apps/economic-profile-system/>

² : https://bber.umb.edu/FIR/H_harvest.asp

Consequently, economics justifications are a weak rationale for proceeding with many of the more questionable components of the proposed action of the timber sale.

XVI. General Comments and Conclusion:

On page 82 of the Draft EA, in Table 39, **we request** that the Final EA advise as to what are the following four (4) references of Supporting File Documentation:

- SHPO Concurrence
- *SHPO Report – pending*
- Regional Approval Letter
- *IRA Approval – pending*

We request that the Final EA include the FS' clarification of these outstanding items in the Environmental Document, and post copies of the SHPO Concurrence and the IRA Approval on the Project Website.

Page 32 of the Draft EA: the list of State Agencies consulted does not include Washington Department of Fish & Wildlife (WDFW). **We request** that the FS have discussions with WDFW regarding fish and other wildlife, as Washington has listed the Northern Spotted Owl as Endangered, rather than merely Threatened as done by USFWS. In addition, WDFW deals with endangered salmonid species and protection. Please note that the Washington Department of Natural Resources does not deal with Threatened & Endangered Species.

In addition to all of the concerns that we have raised in this Comment Letter, **we request and urge that the Forest Service adopt Alternative 2**, with the modifications which we have requested in this Comment Letter, instead of Alternative 1.

We do not support Alternative 1 for the following reasons, in addition to all of our prior comments:

- Under the Hydrology Effects Analysis: Alternative 2 is preferable. See page 26:

*“Currently, it is **most hydrologically advantageous to implement Alternative 2 with the roads package.”***
- Cutting in IRAs is permitted in Alt 1, which we do not support;
- Cutting 20-24" DBH in LSRs is contemplated in Alt 1, which we do not support;
- More variable retention harvesting in Alt 1, which we do not support;
- Cutting over 80 years age in Matrix permitted in Alt 1, which we do not support; and

- Under the Wildlife Effects Analysis, Alternative 2 is preferable. See page 45:

“Under Alternative 2, approximately 61% of the project area would be retained as dispersal-capable habitat for the northern spotted owl, which would also mean a slightly higher proportion of forested conditions for associated species.”

Based on the proposed 30-year duration of the project, and the existing impaired watershed and overstocked forests, combined with the comments presented in this Comment Letter, we reiterate our request that the Forest Service **prepare an EIS** for this project to study the comprehensive impacts to the ecosystems due to the duration and targeted treatments of this project.

We appreciate the opportunity to comment on this significant project. The scale of the project, the sensitivity of the lands and waters in the project area, and the duration of the project require a close analysis of any proposed actions, with plenty of input opportunities from interested parties.

We hope that our comments and concerns will provide an opportunity for discussion and improvement of this project going forward. Please place us on the mailing list and keep us informed of future developments, including the annual Public Review process we have requested.

Sincerely,

Sierra Club - WA State Chapter
National Forest Committee
Don Parks, Co-Chair
dlparks398@gmail.com
Amy Mower, Member
almower@earthlink.net
Cindy Brown, Member
jjrogersmail@yahoo.com