



MUCKLESHOOT WILDLIFE PROGRAM

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May 21, 2025

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

RE: Carbon River Landscape Analysis publication #65083, Draft Environmental Assessment

Dear District Ranger McNeil,

The Muckleshoot Wildlife Program and Wildlife Committee have reviewed the Carbon River Landscape Analysis project's publication #65083, Draft Environmental Assessment received April 23, 2025. 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.

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

Until access is restored across the Fairfax bridge using Highway 165 or an alternative route is secured through private timberlands, much of this project will be put on hold. We hope the Forest Service and the State of Washington are working together to restore access so that Tribal members may access treaty lands in the upper Carbon.

Forest Service Road 78 and 7810 Bridge - We firmly believe Action 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 an option. 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 agree with recommendations for Alternative 1 to treat over-stocked second growth in Chenuis Creek within the Inventoried Roadless Area (IRA) to satisfy Treaty Resource Protection and Enhancement goals. Though the 7840 road in the Chenuis Creek drainage appears to be partially encompassed by IRA, there does appear to be a fair amount of area within the first mile of road that is not and could be treated with commercial harvest. If the 7840 road is not at least temporarily opened, it is likely non-commercial treatments at the back end of the old road system will not be done as it will likely be considered cost-prohibitive to pay contractors to hike in to do the non-commercial thins. We strongly support temporarily opening the 7840 road to conduct pre-commercial or variable density thins. It appears

in the project map there may be an error in the projection of the IRA layer. It seems as if there is an obvious IRA-free corridor along the slope to the north of Chenuis Creek where the 7840 road should exist. If the IRA layer were shifted north, the 7840 road would fall directly between the IRA's and would be available to open for management purposes. We recommend reviewing this discrepancy.

7720 road maintenance issues (S. Prairie Creek) – With current closures in effect for the Carbon River area above the Hwy 165 Fairfax Bridge the 7220 road becomes even more important for access. Anyone who has driven the 7720-22 road system recently will note that it has been lacking maintenance for years. We look forward to seeing efforts directed at getting this road system up to current Forest Service maintenance standards.

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 that off-road driving is destroying wetland habitats near East Lake.

Forest Management

We support Alternative 1 as it maximizes the use of variable retention harvest in the South Prairie Creek and Evans Creek drainages where possible, and provides for an increase in diameter limit in LSR from 20" to 24". These areas are experiencing extreme habitat deficiencies for many Treaty Resources that Muckleshoot Tribal members rely on for subsistence and ceremonial needs.

7840 road – We recommend re-opening the 7840 road along Chenuis Creek, where possible, and treating stands before they reach an age where the NWFP prevents any further treatment or management actions. We support Alternative 1 in treating stands within the Inventoried Roadless Areas (IRA) to further promote the growth of first foods and early successional forests (ESFEs), which enhance game populations and are beneficial to a variety of species. We strongly support all proposed stand treatments and treatment types within the CARLA project area, including the treatment of 192 acres of IRA. Our view is supported by the Roadless Area Conservation Rule of 2001, allowing for timber harvest in IRA 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)).

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,



Brysen Jansen

Vice Chair, Muckleshoot Wildlife Committee