



May 22, 2025

Via Project Website

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

In Reply to: Carbon River Landscape Analysis Project

Dear Mr. McNeil:

The American Forest Resource Council (AFRC) submits the following comments for the Revised Draft Environmental Assessment (EA) for the proposed Carbon River Landscape Analysis Project.

AFRC represents the forest products industry throughout Oregon, Washington, Idaho, Montana, California, and Nevada. AFRC's members include over 50 forest product businesses and forest landowners. AFRC's mission is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and the protection of all forest lands. Many of our members have their operations in communities adjacent to the Mount Baker Snoqualmie National Forest (MBSNF), and the management of these lands ultimately dictates not only the viability of their businesses but also the economic health of the communities themselves. The forest products sector in Washington State continues to provide around 40,000 direct and about 100,000 indirect jobs. In addition to the wages paid, the taxes and other monetary transactions generated by these businesses and family-wage jobs contribute to the infrastructure and well-being of the local communities. AFRC submits these comments on behalf of its members.

Purpose and Need

AFRC is deeply disappointed that economics and timber supply were not included in the 'Purpose and Need' statement.

Washington and surrounding states continue to face an issue with a lack of raw materials to meet manufacturing demands for wood products. Several mills have closed in the past few years. Vegetation management projects, both current and future, on the MBSNF can help contribute to the wood supply that many mills depend on to continue operating and employing their workforce. The economic activity created through these treatments contributes to the greater community's well-being.

Sustainable commercial timber harvest on the Mount Baker Snoqualmie National Forest and neighboring National Forests is critical to our members' near and long-term success. Our members and their contractors and employees rely on the timber output from the MBSNF and surrounding lands, including other National Forests. The economic activity created by this work also supports local economies and government services. Commercial timber harvesting is critical for the vitality of many rural communities in Washington State.

Additionally, much of the non-commercial and non-timber work proposed in the project will benefit from both economically viable and productive commercial timber projects and healthy and vibrant local economies. Too often, we see 'Purpose and Need' statements where the economic contribution of timber harvest appears to be more of an afterthought or byproduct of the proposed work, if it is even included. However, we would suggest that well-maintained roads supported by timber operations lead to the success of other activities such as huckleberry enhancement, safe and efficient recreational access, ecological improvements, and ultimately the ability to accomplish much of the restoration work outlined in these proposals.

Because commercial timber management on National Forest lands provides a substantial economic benefit, we encourage the Forest to include this benefit in the 'Purpose and Need' statement on future projects. We always encourage the Forest to raise the priority of and use clearer, affirmative, and stronger language regarding economic contributions in future projects' Purpose and Need statement.

Proposed Action Alternative

AFRC generally supports Alternative 1, the Proposed Action for this project, and believes it will provide the best opportunity for the Forest to meet its intended goals with this proposed project. The sections below cover specific concerns and/or recommendations.

Commercial Harvest Activities

Variable Retention Harvest in Matrix

AFRC strongly supports the application of Variable Retention Harvest (VRH) in this proposal. The long-term sustainability of timber harvest on National Forest lands, particularly on Matrix lands, in western Washington, requires that stands be re-initiated. VRH treatments, when implemented carefully and correctly, can reinitiate a stand and ensure ongoing sustainability. Additionally, these types of treatments can help create wildlife forage for a broad range of species and the complex early seral habitat, which is a stated goal of this project. The limited acres proposed for VRH are a small percentage of the overall proposed treatment acres. While it is likely not enough to ensure future sustainability at a landscape level, it is a start.

Reforestation proposals raise concerns, as identified on page 10 of the draft EA. Matrix Land's goal is not to develop late seral conditions; therefore, the reforestation plans for VRH treatments should reflect that. We agree that planting a variety of species can aid in the development of a resilient stand that can provide sustainable timber production for future generations. However, planting prescriptions intended to develop late successional habitat are inappropriate for Matrix lands. We believe the initial focus for regeneration harvest should be

on stand health and resiliency, thus promoting a long-term sustainable timber supply from Matrix lands.

Despite the minimal proposal, we applaud the Forest for undertaking this proposed treatment and fully support maintaining the proposed VRH treatment footprint. We would encourage the Forest not to reduce the acres proposed for VRH but to explore expanding the VRH-treated acres.

Variable Density Thinning in Matrix

AFRC has concerns regarding using variable-density thinning (VDT) on Matrix lands. As the EA on page 9 specified, *“Additionally, this treatment provides flexibility to manage for other resource objectives such as wildlife forage and complex and diverse forest structure for landscape restoration.”* While this thinning strategy may be appropriate for stands in the Late Successional Reserves (LSRs), we are concerned about its use on Matrix lands, where a sustainable timber supply can occur. Matrix lands are intended to be a source of sustainable timber supply into the future. Landscape restoration is not necessarily a management goal for Matrix land allocations. On page 9 of the draft EA, the Forest even discloses its intent to return to these stands for future management: *“Between skips and gaps, thinned areas would reduce tree density to 35% of Stand Density Index (SDI) max to provide ample growing space and time for the stand to grow before the next harvest entry at around 60% of SDI max.”*

Thinning prescriptions in plantations on Matrix lands should be focused on spacing and density reduction to foster the growth and resiliency of the stands. Using “skips and gaps” is better suited for treatments in LSRs, where the goal is to create *“complex and diverse forest structure for landscape restoration,”* that supports late seral species. We question using VDT treatments as a long-term, sustainable practice for Matrix lands. Thinning prescriptions on Matrix lands, regardless of age, focused on developing late seral conditions, likely could hamper the future sustainable supply of wood products from these lands. We want to ensure that all stands, including older stands on Matrix lands, are being managed in a manner that will provide for future regeneration harvests and timber production.

We strongly encourage the forest to re-evaluate the types and scale of proposed treatments/prescriptions on Matrix lands that better align with the long-term sustainability of timber supply. The ability of the Forest Service to manage, treat, and ‘restore’ - where applicable - the lands they manage is incumbent on the

Variable Density Thinning in Late Successional Reserves (LSRs)

For stands proposed for treatment in LSRs, we encourage the Forest to first target stands in the 60 to 80-year-old class, as some LSRs will likely “age out” before the Forest gets to them. If possible, the Forest should state that stands under age 80 in LSRs when the Decision Notice is signed are covered by this analysis and are available for treatment.

We also strongly support the Forest Service's efforts for an amendment to allow the harvest of trees up to 24 inches DBH. Too often, especially in western Washington, we see proposed treatments that cannot be fully implemented due to the 20-inch DBH diameter limit. This leads to the inability to meet the ecological goals of the proposals. Additionally, we often also see the

20-inch DBH limit, creates barriers to implementation due to equipment size. At times, due to the length of time required to complete projects, the trees may grow beyond the 20-inch DBH limit. Yet, these stands still need to be treated to accelerate late successional characteristics.

Non-commercial Thinning

AFRC understands that the Forest needs to conduct thinning of non-commercial-size timber stands for the project. However, we suggest that trees in the 9-inch DBH range can sometimes have market value if appropriately packaged for sale. An upper limit of 8 inches DBH will likely ensure that stands with little to no economic return are captured for this treatment.

Riparian Reserve Management

AFRC is pleased to see the Forest propose some treatments within the Riparian Reserves. Many streams in the project area were not buffered during the previous harvest operation. Wide “no-cut” buffers can limit the ability to treat the area that would provide the most significant benefit for accelerating desired future conditions for the Riparian Reserves. The proposed minimum ‘no-cut’ buffers appear to be adequate for water quality protection. Recent studies on the Olympic Experimental State Forest show that treatments such as thinning in stream buffers are beneficial in creating nutrient flow into water bodies that support fish species.

Transportation System

AFRC is not supportive of the significant amount of road decommissioning proposed in this project. While we understand the substantial backlog in road maintenance needs across all National Forests, the ability to address future access needs must be accounted for. Some decommissioning is warranted, and those road segments associated with Action Option 1 related to addressing the 78 Road and its associated spurs do appear to make sense to decommission. We would encourage the Forest not to conduct decommissioning until funds and contracts are secured to implement Action Option 1.

We would also like clarity on how the current OHV trails in the Evans Creek area will remain open to OHV use when classified as ML 1 Roads. Typically, the ML 1 classification means the road is closed to use until needed and only available for administrative use. Western Washington has limited recreational opportunities for motorized recreation (especially four-wheel drive vehicles), and reducing them will further incentivize the unauthorized use of forest roads across the landscape for this purpose.

Harvest Operations

AFRC is pleased to see the inclusion of tethered logging systems as a timber harvesting method. Providing operators with flexibility in harvesting systems, especially given the current challenge of finding qualified cable systems loggers, is critical to the success of this project.

As the Forest and Ranger Districts move into the implementation phase, we encourage the Forest to engage the purchasing community when planning helicopter logging operations. Due to the costs of operations, potential volume removals, timing restrictions, and more, the risk of creating non-economically viable sales is real. Early dialogue can help the Forest be successful with high-cost projects, such as those presented with cable/skyline or helicopter logging.

Quarry Development

We are disappointed not to see the Forest include the potential for using rock from existing pits on the Forest. 'On-Forest' rock pits and the associated products that can be made from them (pit run, crushed aggregate, etc.) can help reduce future costs for maintenance and timber harvest projects. Costs associated with hauling rock long distances have escalated in recent years, often representing a significant cost in timber sale implementation for our members. The rock source for required and optional road work usually influences timber sale economic viability. The long haul distances from commercial rock sources can lead to economically non-viable timber sales.

Climate Change

AFRC strongly encourages the Forest to include the carbon stored in long-lived wood products in their carbon accounting analysis. When used for construction, long-lived wood products, such as lumber and mass timber, can be an important addition to the overall carbon storage provided by these types of vegetation projects.

Additional Project Design Criteria Comments

We are pleased to see the opportunity, on a case-by-case basis, to extend operating periods associated with logging operations beyond the specified dates in the Project Design Criteria document. While we understand some limitations related to ESA obligations, they may narrow the operation windows, which can significantly challenge the economic viability of projects. Helicopter and cable thinning operations are the most impacted by these. Efforts to minimize these LOPs so that operations on the ground have the most significant number of days available are strongly encouraged by AFRC. We are pleased to see the Forest provide flexibility for winter operations. This will be critical for the economic viability of the harvesting projects.

Thank you for the opportunity to comment on this project. We look forward to participating in the further development of this proposal. If you have any questions regarding the above comments or additional information, please contact me at 360-352-3910 or mcomisky@amforest.org.

Sincerely,



Matt Comisky
Washington State Manager
American Forest Resource Council