Conservation Northwest
Keeping the Northwest Wild

May 23, 2025

Brian McNeil, District Ranger
Snoqualmie Ranger District, Mt. Baker-Snoqualmie National Forest
902 SE North Bend Way, North Bend, WA 98045

Re.: Comments regarding the Carbon River Landscape Analysis Project EA (Publication # 65083)

Dear Ranger McNeil,

On behalf of Conservation Northwest (CNW), please accept these comments on the Carbon River Landscape Analysis Project Environmental Analysis. The Carbon River watershed is a somewhat forgotten, yet ecologically significant transition zone between lowland Puget Sound forests and the high-elevation systems of Mount Rainier. We support the project's goals of accelerating late-successional development, improving terrestrial and aquatic habitat connectivity, and enhancing resources significant to Tribes. We write in support of Alternative 1, with requests that we think will improve project outcomes for xyz.

PROJECT CHALLENGES

One of the most curious things about this project area is the NWFP land allocations, with an ORV park in LSR (Evans Creek area), and Matrix stands in the steep ravines and ridgetops of South Prairie Creek tributaries. We appreciate the thoughtful work of the resource specialists to try and balance this mismatch and create connected habitat for wildlife as well as an economically viable project.

Early on the project suffered from avoidable time constraints. A longer pre-scoping period was needed for specialists to get on the ground, gather information, and coordinate planning. Timber and engineering (transportation/roads) were some of the last people to visit the project area, making the project's economic viability challenging from the start – these specialists should always be first on the ground to assess road and stand conditions, followed by other natural resource and heritage specialists. In this case, the significantly degraded road network on private timber lands and USFS lands inside and adjacent to this project has put its economic viability in question multiple time. A longer pre-scoping period (2 years) would allow more time for specialists to gather data and meet with Tribes and other stakeholders, before the one-year EA clock starts ticking.

THINNING TREATMENTS

Variable Retention Harvest (Matrix, Commercial Harvest)

We appreciate that Variable Retention Harvest (VRH) is reserved only for Matrix lands. We encourage maximizing this option in the Evans Creek ORV area, as in Alternative 1. In the South

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Prairie Creek area, we expect treatment acres will be closer to the estimated 1,429 acres after PDC and operational constraints are applied. As the EA notes, VRH removal should not be higher than 67-70% or approximately 2/3 of a unit. In other words, approximately 30-33% or 1/3 of each harvest unit should be retained (can include riparian buffers) in a well distributed pattern. VRH should be focused on flatter geographies, and retention strategies must prioritize legacy structure and aggregated leave to ensure heterogeneity and patchiness versus uniform openings. Aggregated retention also provides more management flexibility, costs less to harvesters, and decreases safety issues. We have documented some incredible legacy features along the upper ridges of FSR 7720, including a 43" DBH Douglas Fir at 47°04'46.7"N 121°52'29.6"W, currently within a stand proposed for VRH (see Appendix A). To ensure that the goals of the retention part of Variable Retention Harvest are achieved, we would like to see the use of this spatial prescription in your timber contract, borrowed from the British Columbia government: more than half of the harvest unit is within one tree height of the base of a tree or group of trees.[1] Avoid placement of VRH units adjacent to sensitive habitat or within key connectivity corridors. While it makes sense to select VRH stands in terms of their proximity to existing ungulate forage areas, we note that adjacent Tribally managed lands to the north are heavily harvested in short rotation creating perpetual nearby forage opportunities, though perhaps of lower quality (Figure 1). In places where ecological or operational restrictions are too great for VRH, we encourage alternating to a Variable Density Thinning (VDT) harvest or non-commercial thinning (NCT) in South Prairie Creek Matrix lands.

We note that new invasive species infestations are highly likely in VRH stands (EA p. 48) and PDC measures will be more successful if the invasive plant program is operating at full capacity. Please prioritize this work during implementation.

[1] https://www2.gov.bc.ca/gov/content/industry/forestry/managing-our-forest-resources/silviculture/silviculture-research/silvicultural-systems-research/stems/aggregated-retention

Figure 1. Google Map image of East Fork South Prairie Creek drainage showing heavily harvested timber lands adjacent (north) of the project area where much of the VRH harvest is proposed.

Variable Density Thinning (Matrix and LSR, Commercial Harvest)

We suggest maximizing Variable Density Thinning (VDT) in Evans Creek Matrix lands, as per Alternative 1. Again, in the South Prairie Creek area, we expect VDT treatment acres will be closer to the estimated 256.5 acres after PDC and operational constraints are applied, and perhaps greater if some VRH stands shift to VDT.

Free thinning (removing smaller suppressed trees and some dominant and codominant trees, as described in the EA) can also be called positive thinning where competing trees are removed to maximize the growth of the "best" trees. This is a shift from VDT in LSR in the scoping document that assigned a "thin from below" strategy - better protecting standing and on-the-ground biological legacies - and a call-out to retain Douglas-fir as leave trees. The EA notes that "careful consideration would be made to leave as many stand components directly related to late-successional development as possible…" (EA p. 9). Nonetheless, we have concerns regarding a free thinning method of tree harvest, particularly if units are not marked by Forest Service staff in advance. A machine operator – who has limited view from the cab – should not be "free thinning" according to unit prescription. Thinning from below ("low thinning") mimics the effect of natural mortality and will effectively achieve old tree, spatial pattern, and species objectives. Free thinning/positive thinning/thinning from above are overly focused on the elimination of "undesirable" trees and forest characteristics

that we think are desirable such as large "competing" trees, diseased trees with mistletoe, or forked tops.

Riparian Reserves

The no-harvest buffers in Table 3 (EA p. 7) are too small and should be adjusted in the final EA. The NWFP standard is 300ft for fish-bearing streams (ESA listed and non-listed species) (600ft both sides of channel), 150ft for perennial non-fish bearing (300ft both sides of channel), and 100ft for intermittent non-fish bearing (NWFP S&G C-30-31).

Commercial Harvest Summary

Overall, we appreciate that the VRH and VDT narratives align with the goals of ecological forestry. In the final EA and in timber contracts, we ask that you describe or draw what the stand and project area will look like post-harvest (the inclusion of images or aggregated and dispersed retention patterns in the EA is a good example). This will help pre-sale foresters, timber sale administrators, and resource specialists that are ultimately implementing the project over the next several decades, as well as operators. We offer these suggestions to make VRH and VDT outcomes in the EA more explicit:

- Talk more about species heterogeneity. Are there Tribally important or climate resilient species you will work to keep on land (e.g. Western red cedar, Douglas fir, Western White Pine)?
- There exists an REO exemption allowing for the take of trees up to 24" DBH "where trees over 20" DBH are abundant" (EA p. 9). What metric constitutes "abundance" in a stand? This will be difficult for most operators to eye from a cab, without FS marking. Operators need clear metrics in order to achieve preferred ecological outcomes, as the next point emphasizes.
- We feel strongly that the protection of large and old trees, species and spatial heterogeneity, and well distributed patterning need to be explicit (i.e. metrics or descriptions such as the BC example) in the commercial prescriptions so that pre-sale foresters, timber sale administrators, and operators have clear guidance on sale layout and harvest operations, post-harvest expectations are made clear, and ecological outcomes are achieved.

Non-commercial Thinning (Matrix, LSR, and Inventoried Roadless Area)

In Alternative 1, 1,048.4 acres are proposed for non-commercial thinning (NCT) within the Matrix, LSR and Inventoried Roadless Area land allocations. Curiously, this is 272.3 acres less than the NCT total in Alternative 2 which doesn't include IRA lands. The NCT treatments and outcomes are excellent – enhance huckleberry and bear grass production, increase growth of suitable nest trees while maintaining woody debris for prey, accelerate late successional development to increase connectivity with adjacent forest structure, etc. Where commercial treatments are not economically

viable, we would like to see as much NCT completed as possible. We understand there is good potential NSO habitat in the Chenuis Creek drainage and support NCT in the IRA.

FUELS & FIRE

We are grateful to see post-thinning fuels treatments in the proposed project. Mechanical thinning is only one-half of a treatment and treatment should not be considered complete until excess slash from thinning is also treated, preferably with fire to enhance wildlife habitat or stimulate fire-dependent plant species. We also appreciate the consideration that it may be more beneficial to lop and scatter or construct habitat piles for wildlife in NCT stands, rather than burn. We especially appreciate the desire to reintroduce fire through cultural burning and are actively working to support such efforts with the Tulalip tribe.

Thank you for removing shaded fuel breaks from the project which we support only in the Wildland-Urban interface (WUI) for the protection of life and structures. One of the main intentions of shaded fuel breaks is to provide control and anchor points for the management of wildfire. However, the best anchor and control points are where thinning and prescribed burning have been completed and where maintenance burning is performed.[2] The broad scale of landscape treatments provides additional options for firefighters instead of constraining them to a predetermined location that may or may not be the most beneficial for the current weather and fire activity.

WILDLIFE

It is no longer enough to retain some live trees, large snags, and large down logs. To protect from biodiversity loss and promote watershed resilience, we are interested in retaining a diversity of structures, species, and environmental niches.**Error! Bookmark not defined.** A diversity of individual structures (features) combined with complex spatial arrangements of those structures will provide the diversity of conditions (species, structure, microclimates) needed to sustain biodiversity and functioning watersheds.**Error! Bookmark not defined.** Therefore, we are grateful to see actions specific to wildlife health and habitat (structure enhancement) and will work with USFS specialists and Tribal partners to help shape and implement approved actions. The EA would benefit from:

- Explicit metrics regarding the amount of CWD that should be left or created per acre, especially in Matrix stands.

[2] Prichard, SJ, Hessburg PF, Hagmann RK, Churchill DJ, Povak NA, Dobrowski S., Gray RW, Huffman D, Hurteau MD, Kane V., Pratima KC, Keane RE, Kobziar L, Lake FK, North MP, Safford H, Stevens J, Kolden C, 10 [2] Prichard, SJ, Hessburg PF, Hagmann RK, Churchill DJ, Povak NA, Dobrowski S., Gray RW, Huffman D, Hurteau MD, Kane V., Pratima KC, Keane RE, Kobziar L, Lake FK, North MP, Safford H, Stevens J, Kolden C, Parks S, and Yocom L. (2021). Adapting Western North American Forests to Climate Change and Wildfires: Ten common questions. Invited feature. Ecological Applications, Vol 31, Issue 8.

- Explicit metrics regarding the number of snags desired per acre.
- The marking of trees selected for nest platform development.
- Data regarding current and future species connectivity needs.

AQUATICS

It is a missed opportunity not to include more aquatic improvement actions in this project (AOPs (not just timber roads), beaver dam analogs, in-stream wood placement, floodplain restoration, etc.). **We do not want to see the MBSNF move away from integrated projects that address all resource improvements needed to move a watershed from impaired/at-risk to functioning properly.**

RECREATION

We support the efforts to curb dispersed camping and recreational habitat degradation from the project, including Summit Lake revegetation improvements and road closures in the South Prairie Creek area. We are very supportive of the Celery Meadows trailhead relocation outside of the IRA. We would like to see the end of FSR 7726 decommissioned (vs. ML 2) (Figure 2). The proposed gate installation preventing access to the old trailhead is necessary. When harvest is complete, in consultation with Tribes, we suggest decommissioning the FSR currently proposed as ML1/closed, and closing the FSR 7720 segment currently proposed as ML 2/high-clearance vehicles (Figure 2). This last segment of FSR 7720 crosses no less than 13 significant side-tributaries or creeks, ultimately reaching East Fork South Prairie Creek.

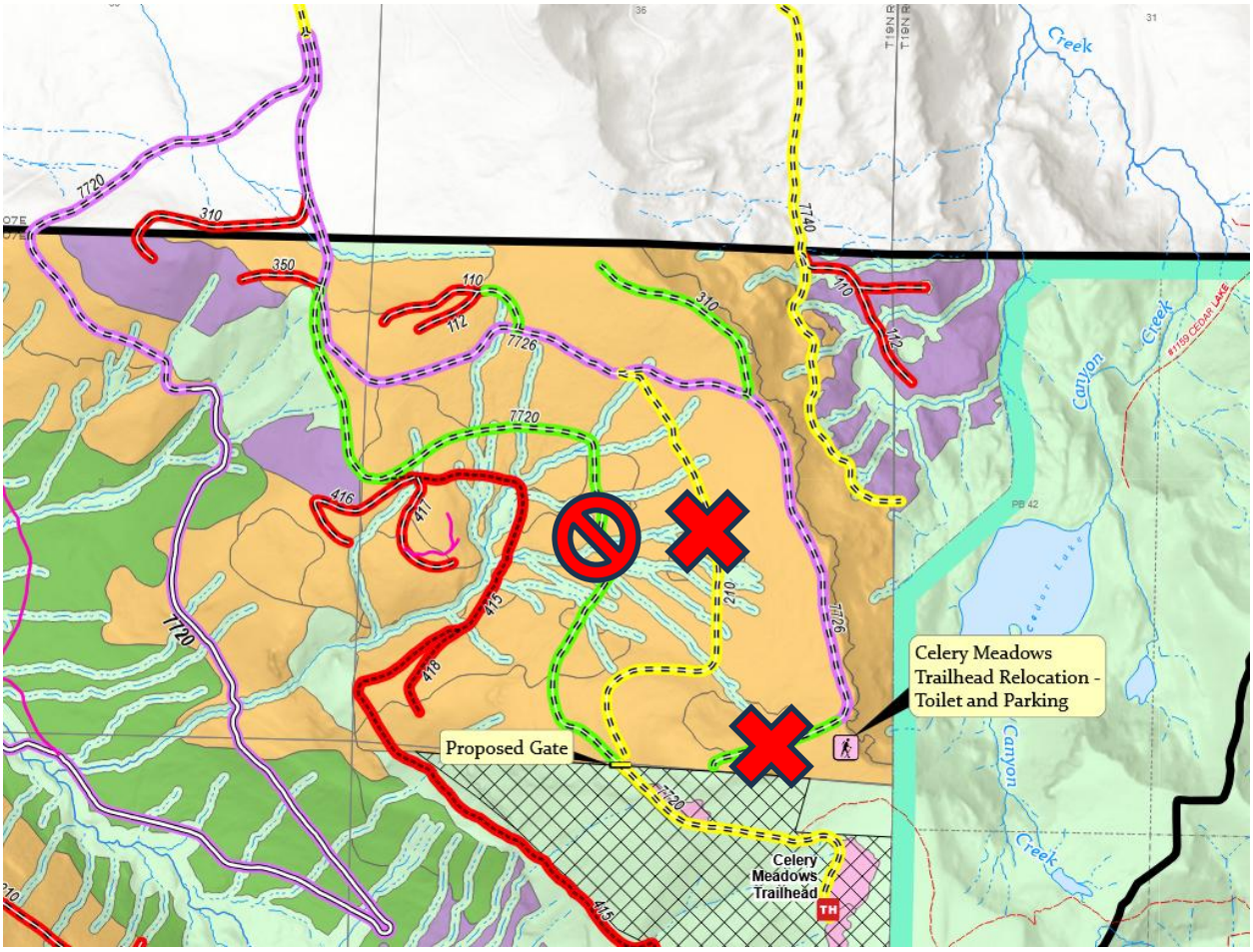


Figure 2. To improve aquatic habitat and watershed function, further road decommissioning and closures are needed in the South Prairie Creek area. Decommission = ✖ Closed = ⊘

We support decommissioning of FSR 78 and the 7810 bridge (Option 2) after non-commercial harvest in this area is complete and all roads east of the bridge are decommissioned. If Option 2 is too expensive, we support maintaining the road until a catastrophic event removes the road or funds to maintain it are depleted, whichever comes first. While we would like to support the relocation of FSR 78 (Option 1), we don't think that acquiring the funding needed for a project of that scale is realistic, and we would prefer to see the floodplain restored and functioning unimpaired. A new, non-motorized trail would still provide access to the Clearwater Wilderness and Forest Service lands, though, regrettably, not equitably.

We would be remiss if we didn't note the 57" DBH Douglas Fir we documented near Coplay Lake at 47°01'20.4"N 121°50'08.8"W (see Appendix A). Also in the area were huckleberry patches (47°01'28.0"N 121°50'06.8"W, 47°00'59.8"N 121°49'54.1"W) and Western White Pine (47°01'00.4"N 121°49'54.9"W). NCT treatments will improve the productivity and health of these species important to wildlife and Indigenous partners.

HYDROLOGY & TRANSPORTATION

Thank you for the color-coded map and tables of proposed road actions summarizing the current road miles and their associated maintenance levels alongside the post-project road miles and associated (changed) maintenance levels -

Table 7. Alternative 1 Transportation System Summary

Transportation System by Maintenance Level[1]	Existing Operational	Alt 1 Objective
1 - Basic custodial care (Closed)	13.78	29.29
2 - High clearance vehicles	23.11	12.25
3 – Suitable for passenger cars	32.37	24.49
4 – Moderate degree of user comfort	1.19	1.19
5 – High degree of user comfort	7.71	6.59
Total System Road Miles	**78.16**	**73.81**
Total System Roads Decommissioned	N/A	17.53
Temporary Roads: Estimated Existing OHV trail system- for temporary road use.	N/A	13.92
Temporary Roads: Estimated Existing Legacy Road Prism- for temporary road use.	N/A	13.00
Temporary Roads: Estimated New Temporary Roads	N/A	15.00

In Alternative 1, we appreciate that approximately 17.5 miles of road are proposed for decommissioning; we would like to see this increased to approximately 18.7 with the addition of requested decommissioning near the Celery Meadows trailhead. ML 1 mileage would also increase with the closure of the last mile+ of FSR 7720. We are pleased to see extensive closures planned for the South Fork South Prairie Creek area off of FSR 7722 and the decommissioning of several miles of road east of T. Rex Falls. This area is unnecessarily abused by user-create trails, amethyst digging, and illegal target shooting, as is the area around FSR 7724 (see Appendix B).

Alternative 1 proposes to turn 13.17 (or 13.92?) miles of the Evans Creek OHV trail system into "temporary roads" to accommodate timber haul, potentially improving associated aquatic conditions temporarily. However, after timber operations, these "temporary roads" would be "maintained" as ML 1 roads (EA p. 17) but with water bars, barriers, berms, and culverts left in place. We see two problems with this plan –

1. ML 1 (closed/stored) roads are not maintained roads and must be rehabilitated post-project by "…reducing compaction, planting native seed, adding surface cross drains, removing temporary culverts, camouflaging road junctions, and scattering slash as needed" (EA p. 17).
2. Any "temporary roads" (estimated at 41.17 miles within the project if you include the OHV trails) must be decommissioned once harvest is completed, not closed and rehabilitated (Forest Service Manual 7700).[3]

Notwithstanding their location in LSR in which new roads must be kept to a minimum, routed through non-LSR habitat where possible, and designed to minimize adverse impacts (NWFP S&G C-16), any new temporary roads and any temporary roads reestablished on the old legacy road prism must be decommissioned post-harvest (Forest Service Manual 7700).[3] We question why 13.17 miles of motorized trails converted to "temporary" roads for timber harvest cannot be converted back to trails for OHV. If they are designated as temporary roads, they should also be decommissioned post-harvest. If they are to be improved for timber haul and then maintained for OHV use post-harvest (i.e. not decommissioned), that maintenance needs to be accounted for and the roads (trails?) need to be categorized appropriately in the National Forest System Road database for tracking and maintenance purposes.

The MBSNF transportation network (National Forest roads, user created roads and trails, motorized trails) and associated infrastructure are the primary source of altered hydrologic regimes, accelerated sedimentation, disconnected floodplains, and impaired water quality and fish habitat function. Transportation systems are also a major contributor to habitat fragmentation, impacting wildlife connectivity. The fewer roads we have to maintain, the more improved watershed function and health becomes.

We note that road closures and decommissioning have the potential to remove access to cultural resources which may be good (prevent vandalism and fire starts) or bad (block access for Tribal members or the public). Tribal access is not only guaranteed by law, but also essential to Tribal well-being and must be a central consideration when prioritizing recommended road changes. The EA should note that all roads designated for decommissioning or ML1 (closed) have been or will be approved by Tribal parnters.

TRIBAL PARTNERS

We thank the District for their efforts to include Tribal partners and priorities in project planning. Conservation Northwest's Forest Field Team has a personal and ethical interest in working with our

[3] Forest Service Manual 7700 temporary road definition: Roads authorized by contract, permit, lease, other written authorization, or emergency operation not intended to be part of the forest transportation system and not necessary for long-term resource management. These roads are not included in the National Forest System road inventory and are decommissioned after use… During the time periods in between use, these roads must be temporarily blocked. After final use of the road is complete, the temporary road will be fully decommissioned.

Tribal partners and practicing conservation through reconciliation action.[4] We are committed to fulfilling trust and treaty obligations and supporting co-stewardship opportunities that enhance Tribal ecocultural resources and use of traditional ecological knowledge as outlined in the 2023 USFS Tribal Action Plan and other USFS documents.[5,6,7] We mentioned this in our scoping comments but it bears repeating. As you plan this project, we recommend ongoing practice of these recommendations from the report "Braiding Indigenous and Western Knowledge for Climate-Adapted Forests: An ecocultural state of science."[8]

1. Adopt proactive stewardship.
2. Recognize and respect Tribl Sovereignty and Indigenous knowledge.
3. Provide the flexibility to steward dynamic landscapes and navigate uncertainties under rapidly changing conditions.
4. Ground agency planning, and land and resource stewardship policies in an ethic of reciprocity and responsibility to many future human generations.
5. Catalyze innovative approaches to forest stewardship.

CLIMATE CHANGE

This is the first EA where we have seen climate vulnerability and carbon calculations analyzed at this scale – thank you! We anticipate that USFS monitoring will help determine whether or not carbon storage continues to outweigh the losses expected by this and other projects, cumulatively.

MONITORING

The final EA would benefit from the inclusion or summation of implementation and effectiveness monitoring recommendations with input from each specialist. This monitoring section should align with the Mt. Baker-Snoqualmie NF Forest Plan Monitoring Program (2016) and include:

- what monitoring programs/data currently exist in within the project area
- what monitoring you are already planning to do
- what other monitoring needs to be done and how it might be prioritized
- which monitoring activities the IDTeam will be a part of

[4] Syrowitz, J. 2024. Prioritizing Tribal values, collaboration and reconciliation are how we will heal the land and its people. https://conservationnw.org/news-updates/prioritizing-tribal-values-collaboration-and-reconciliation-are-how-we-will-heal-the-land-and-its-people/

[5] USFS. 2023. Strengthening Tribal Consultations and Nation-to-Nation Relationships. A USDA Forest Service Action Plan. FS-1211. https://www.fs.usda.gov/sites/default/files/fs_media/fs_document/Strengthening-Tribal-Relations.pdf

[6] Charnley, S., Fischer, A., Jones, E. 2008. Traditional and Local Ecological Knowledge about Forest Biodiversity in the Pacific Northwest. USFS Pacific Northwest Research Station. General Tech Report PNW-GTR-751.

[7] Long, J., Frank, L., Lynn, K., Viles, C. 2018. Chapter 11: Tribal Ecocultural Resources and Engagement. In: Synthesis of science to inform land management within the Northwest Forest Plan area. Authored by Thomas A. Spies, Peter A. Stine, Rebecca A. Gravenmier, Jonathan W. Long, Matthew J. Reilly. USFS Pacific Northwest Research Station. General Tech Report PNW-GTR-966.

[8] Eisenberg, C., Prichard, S., Nelson, M., Hessburg, P. 2024. Braiding Indigenous and Western Knowledge for Climate-Adapted Forests: An ecocultural state of science report. https://depts.washington.edu/flame/mature_forests/pdfs/BraidingSweetgrassReport.pdf

- how the sale administrator will be involved in compliance monitoring activities
- what the primary objectives are of current and future monitoring programs
- how monitoring outcomes will be used to drive adaptive management strategies
- where the gaps are in capacity and funding

CONCLUSION

We are grateful to see another forest restoration project on MBSNF. Especially under the timber harvest pressures of the current federal Administration, we continue to be concerned about any shifts away from integrated watershed restoration projects that include meaningful process-based aquatic improvements. We think that effective ecosystem restoration on the MBSNF would also benefit from -

- A forest-wide programmatic EA for prescribed fire (e.g. Prescribed Fire for Restoration and Hazardous Fuels Project on the Sawtooth NF).
- A focus on reestablishing landscape-scale terrestrial connectivity, both north-south (latitudinal) connectivity, and east-west (elevational) connectivity that allows high and low mobility species to move securely as they adapt to a changing climate.
- Agency planning, and land and resource stewardship policies grounded in an ethic of reciprocity and responsibility and includes more, funded co-stewardship with Tribal partners.

We are excited to see more forest health work being completed on the Mt. Baker-Snoqualmie National Forest. The right treatments in the right locations will more quickly restore the ecological processes necessary for wildlife connectivity and long-term resilience, better preparing these forests to withstand the impacts of climate change, big fires, and future atmospheric river events. Thank you for considering our comments.

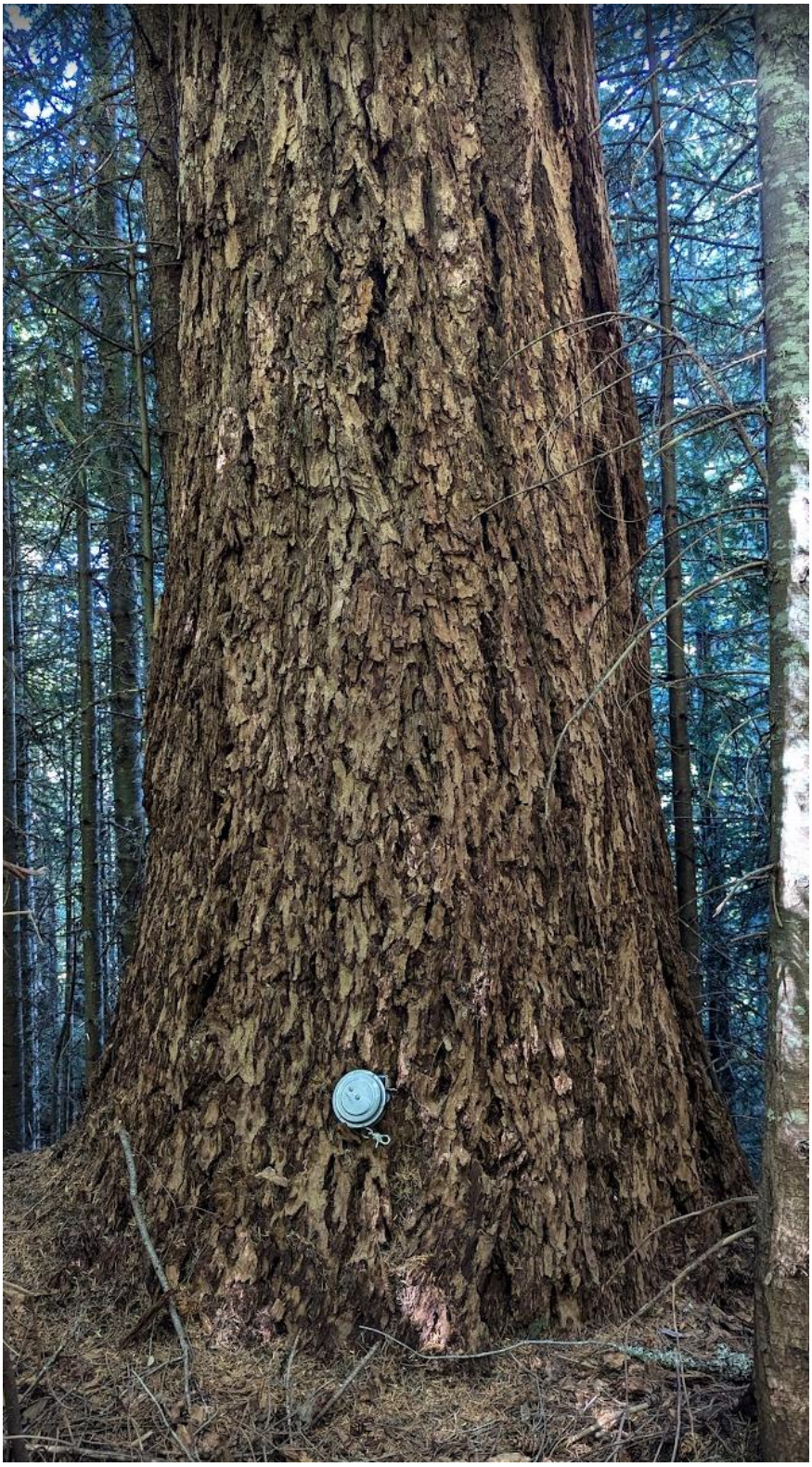
Sincerely,

Jen Syrowitz, M. Env.
Sr. Manager, Conservation Programs
jsyrowitz@conservationnw.org

Cc: Laurel Baum, Project Manager, Central Cascades
Dave Werntz, M.S., Science and Conservation Director

APPENDIX A

43” DBH Douglas Fir at 47°04'46.7"N 121°52'29.6"W (South Prairie Creek), currently within a stand proposed for VRH.



57” DBH Douglas Fir at 47°01'21.4"N 121°50'09.7"W (Coplay Lake) that will benefit from NCT treatment.

APPENDIX B

Rock digging at 47°03'37.4"N 121°54'22.2"W

One of many illegal user-created motor-bike and mountain bike trails in the South Prairie Creek area; 47°03'56.5"N 121°54'14.6"W

One of many illegal shooting sites in the South Prairie Creek area; 47°04'03.4"N 121°52'37.5"W