



*Sent via email at*

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May 23, 2025

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

## **Re: Carbon River Landscape Analysis Environmental Assessment Comments**

District Ranger McNeil:

WildEarth Guardians (Guardians) respectfully submits the following comments in response to the U.S. Forest Service’s Draft Environmental Assessment (EA) for the Carbon River Landscape Analysis Project (Project) in the Mt. Baker-Snoqualmie National Forest (MBS). Guardians is a nonprofit conservation organization with offices in Washington, Oregon, and five other states. Guardians has nearly 200,000 members and supporters across the United States and works to protect and restore wildlife, wild places, wild rivers, and the health of the American West. Guardians and its members have specific interests in the health and resilience of public lands and waterways.

The Forest Service proposes commercial logging activities on over 4,600 acres, including 3,118 acres of variable density thinning (VDT) and 1,514 acres of variable retention harvest (VRH). The Forest Service also proposes approximately 965 acres of non-commercial thinning, including over 83 acres within inventoried roadless areas (IRA). In addition to logging impacting IRAs, the Project includes logging adjacent to and near Mt. Rainier National Park and the Clearwater Wilderness. The proposed logging would also affect occupied and critical habitat for Puget Sound Chinook Salmon, Puget Sound Steelhead Trout, and Bull Trout.

For these and other reasons discussed below, the Forest Service needs to prepare an environmental impact statement (EIS) for the Project.

### **I. How national timber targets are influencing Forest Service priorities.**

At the outset of its purpose and need statement for the Project, the Forest Service claims the Multiple-Use Sustained Yield Act (MUSYA) “directed forests to manage renewable surface resources (watershed, wildlife, fish, timber, recreation, and range) so that they are utilized to best

meet the needs of the American people.”<sup>1</sup> In announcing this “multiple-use” mandate, Congress further directed that the Forest Service must “mak[e] the most judicious use of the land” and that “some land will be used for less than all of the resources.”<sup>2</sup> Congress also directed that implementation of the “multiple-use” mandate must be done “without impairment of the productivity of the land” and that management of the various renewable surface resources is not to be driven by what “will give the greatest dollar return or the greatest unit output.”<sup>3</sup>

When Congress passed the National Forest Management Act (NFMA) in 1976, it added additional clarity to the Forest Service’s “multiple-use” mandate. Specifically, Congress recognized that “the majority of the Nation’s forests and rangeland is under private, State, and local governmental management.”<sup>4</sup> As such, Congress stated that it is those “nonfederally managed renewable resources” that provide the basis for “the Nation’s major capacity to produce goods and services.”<sup>5</sup> Congress also required the Forest Service to “reduce pressures for timber production from Federal lands.”<sup>6</sup> This must inform how the Forest Service views its public trust obligations in managing our national forests.

Over the last several years, however, the Forest Service has clearly been driven primarily by its timber targets. That overarching focus on meeting or exceeding timber targets is evident in both public and internal agency documents that reveal an agency culture that rewards forests that meet their targets and punishes forests that do not meet their targets. In other words, the Forest Service’s incessant push to meet or exceed timber targets is impermissibly based on what “will give the greatest dollar return or the greatest unit output” of timber. That focus on timber targets is also coming at the expense of other multiple uses of our national forests.

## A. Timber Targets Report

In April 2022, the Forest Service issued a report outlining how it could “achieve and sustain” a higher timber target.<sup>7</sup> At the outset, the agency explained that it had already increased timber volume output to an average of 3.08 BBF over a 5-year period ending in FY21, “higher than any period in the previous few decades.”<sup>8</sup> The Forest Service did this by “substantially increasing the use of the new stewardship and [Good Neighbor Agreement] authorities provided in the FY 2018 Omnibus Appropriation’s bill and 2018 Farm Bill,” which the agency said are “helping us increase vegetation treatments on National Forest System lands.”<sup>9</sup> The Forest Service said it had

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<sup>1</sup> Draft EA 5.

<sup>2</sup> 16 U.S.C. § 531(a).

<sup>3</sup> *Id.* See *Mountain States Legal Foundation v. Glickman*, 92 F.3d 1228, 1238 (D.C. Cir. 1996) (stating that objectives for logging in forest management statutes “does not mean that logging must be maximized at the expense of all other values”).

<sup>4</sup> 16 U.S.C. § 1600(5).

<sup>5</sup> *Id.*

<sup>6</sup> 16 U.S.C. § 1600(7).

<sup>7</sup> Timber Target Report, 1 (Ex. 1); also available at <https://www.fs.usda.gov/about-agency/budget-performance/fy22-appropriations> (click on “Agency Timber Target” and then click on “Report”).

<sup>8</sup> *Id.*

<sup>9</sup> *Id.* Note: the Good Neighbor Authority allows the Forest Service “to enter into agreements with State, County, and Tribal agencies to perform forest, rangeland, and watershed restoration services on, and adjacent to, National Forest System lands. See

“increased training on the use of the new authorities” in order to “continue the expansion of the timber program[.]”<sup>10</sup>

According to the Forest Service, by the end of FY21, the recent increase in timber volume output to a 5-year average of 3.08 BBF had already “outpaced the agency’s ability to prepare enough project areas and has exhausted most of the agency’s available NEPA-approved projects.”<sup>11</sup> Despite that, the Forest Service acknowledged there were “additional increases planned for the upcoming years” and the agency was “increasing [its] effort in preparatory work to achieve and sustain” even “higher volume sold output[s].”<sup>12</sup> In order to “develop, implement, and administer more timber sales to attain an increased target,” the Forest Service stated that “a reallocation of agency support staff for administrative, human resources, finance, information technology, and related functions must also be prioritized to support this effort.”<sup>13</sup>

The Forest Service next stated that the Pacific Northwest was one of three regions “should have the greatest increase in total volume sold” in order to attain and sustain higher timber targets.<sup>14</sup> In order to do that, the Forest Service said it continues to “actively pursue updating land management plans” (like the NWFP) and to “promote areas where there has been limited harvesting opportunities.”<sup>15</sup>

In February 2023, the Forest Service increased the national timber target to 4 BBF.<sup>16</sup> The Pacific Northwest Region’s timber targets were set at 575 million board feet (MMBF) in FY23, increasing to 653 MMBF in FY24.<sup>17</sup> This is in line with the Timber Target Report’s call for the Pacific Northwest to be one of the regions to “have the greatest increase in total volume sold.”

This increased timber target for the Pacific Northwest threatens our regions forests, watersheds, and wildlife.

## **B. Pressure to meet timber targets**

The Forest Service puts an enormous amount of pressure on its staff to meet assigned timber targets. For example, in December 2017, former Regional Forester James Pena sent a letter to forest supervisors in Region 6 stating:

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<https://web.archive.org/web/20250211114541/https://www.fs.usda.gov/detailfull/r5/workingtogether/partnerships/?cid=fseprd646022>. Stewardship agreements “are a tool that the Forest Service can use to engage any non-federal partner when there is a mutual interest and mutual benefit presented in a proposed project to be implemented on National Forest System lands.” *Id.*

<sup>10</sup> *Id.*

<sup>11</sup> *Id.*

<sup>12</sup> *Id.*

<sup>13</sup> *Id.* at 2.

<sup>14</sup> *Id.*

<sup>15</sup> *Id.*

<sup>16</sup> David Lytle email, 1 (Ex. 1) (obtained in response to FOIA Request #2024-FS-R6-04259-F).

<sup>17</sup> *Id.* at 4.

[I]t is critical that we take advantage of all the tools that we have available to us to implement an integrated restoration program. These include, but are not limited to, simpler NEPA analysis, virtual boundaries, weight scaling, DxP and DxD, Good Neighbor, Tribal Forest Protection Act and stewardship contracting authorities. **Just as use of these types of tools are part of my performance standards, they will also be part of your performance standards.** Please expect a request to all Forest Supervisors and the Area Manager specifically identifying the tools that you are currently using and those that you plan to implement during FY 2018.<sup>18</sup>

The fact that meeting timber targets factors so heavily into the job performance for Forest Service staff likely causes staff to discount impacts to wildlife and watersheds. Just a few months after Regional Forester Pena's letter, the Acting Threatened and Endangered Species (TES) Program Manager for Region 6 sent an email stating the Mt. Baker-Snoqualmie National Forest was "very concerned of not meeting this year's timber target as a result of T&E issues."<sup>19</sup> The TES Program Manager stated that they were "trying to help them find options" but "am really at a loss for ideas" and "I feel horrible for that."<sup>20</sup> It should go without saying that the TES Program Manager's concern should be for threatened and endangered species, not whether a national forest meets its timber target.

More recently, on the Siuslaw National Forest, a mid-year increase in that forest's timber target caused "complaints about sacrificing aquatics for additional 5 mmbf."<sup>21</sup> Two months later, in a meeting with the Federal Timber Purchasers Committee (FTPC), Region 6 staff revealed why some staff on the Siuslaw National Forest are concerned about "sacrificing aquatics" in exchange for increasing timber volume outputs. Specifically, Region 6 staff assured FTPC that "we are seeking efficiencies with NEPA documents" and "are going to be **as aggressive as possible** in meeting the 575 [MMBF] target" for FY23.<sup>22</sup>

In a June 2023 "timber target check-in" meeting, Region 6 leadership bluntly told its staff that "[w]e either meet our target or not, period" and because Region 6 "came up short last year" it "set a bad precedent that R6 is not a good investment."<sup>23</sup> As a result, Region 6's "NFTM dollar were reduced and sent to R8 & 9."<sup>24</sup> Thus, the Forest Service punishes regions that do not meet their timber target, creating a perverse incentive to be "as aggressive as possible" to meet that target, even perhaps, if it means "sacrificing aquatics."

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<sup>18</sup> James Pena letter (Dec. 21, 2017) (emphasis added) (Ex. 2) (obtained in response to FOIA Request #2024-FS-R6-04259-F).

<sup>19</sup> Anne Poopatanapong email (May 3, 2018) (Ex. 3) (obtained in response to FOIA Request #2024-FS-R6-04259-F).

<sup>20</sup> *Id.*

<sup>21</sup> FY23 R6 Final Timber Volume Sold Target Assignment to Units (Column G), 2-22-23 (Ex. 4) (see Row 8, Column I. Note that the author wrote "scafificing auatics," which was clearly intended to mean "sacrificing aquatics") (obtained in response to FOIA Request #2024-FS-R6-04259-F).

<sup>22</sup> Draft FTPC R6 Breakout Discussion (Apr. 19, 2023) (emphasis added) (Ex. 5, p. 257) (obtained in response to FOIA Request #2024-FS-R6-04259-F).

<sup>23</sup> Timber target check-in 6/9/2023 (Ex. 6) (obtained in response to FOIA Request #2024-FS-R6-04259-F).

<sup>24</sup> *Id.*

## II. Specific Comments on the Draft EA

With the above framing in mind, we provide the following specific comments on the Draft EA.

### Variable Density Thinning

- The Forest Service provides post-treatment canopy cover percentages for matrix stands but not for LSR stands.<sup>25</sup>
  - The Forest Service should provide post-treatment canopy cover percentages for LSR stands as well.
- The Forest Service claims that there will be no logging in late-successional reserve (LSR) stands that are 80 years of age or older.<sup>26</sup> However, the proposed amendment to the Northwest Forest Plan, if approved in its current form, would increase the 80-year-age limit to 120 years-old.
  - The Forest Service should disclose whether it intends to keep the 80-year limit or increase this to 120 years if the Northwest Forest Plan is amended to allow this. If the latter, this would require supplemental environmental analysis under NEPA.

### Restocking

- The Forest Service cites the NFMA requirement for restocking within 5 years and that on MBS, the minimum stocking would be 190 trees/acre.<sup>27</sup>
  - Guardians reviewed various monitoring reports available on the MBS website to see if the Forest Service has been meeting this NFMA requirement over time. However, we could only find one monitoring report that even discussed restocking levels and that was in 2008.<sup>28</sup> The Forest Service needs to disclose recent monitoring data so the public can see whether the agency is meeting the restocking requirement.
  - This is especially important considering the staffing challenges at the Forest Service. For example, the Forest Service admits that reductions in its budget and staff are both ongoing and foreseeable.<sup>29</sup> While the Forest Service disclosed that such reductions are having a negative impact on the agency's ability to prevent the spread of invasive species (Draft EA 48), the Forest Service failed to analyze how these reductions are likely to have similar negative consequences on other resource areas. The Forest Service must explain how it plans to perform required

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<sup>25</sup> Draft EA 9.

<sup>26</sup> *Id.*

<sup>27</sup> *Id.* at 10.

<sup>28</sup> See Fiscal Year 2008 Monitoring Report, 12 (Aug. 2010), [www.fs.usda.gov/sites/nfs/files/r06/mbs/publication/2008%20Monitoring%20Report.pdf](http://www.fs.usda.gov/sites/nfs/files/r06/mbs/publication/2008%20Monitoring%20Report.pdf). This and other reports available at <https://www.fs.usda.gov/r06/mbs/planning>.

<sup>29</sup> Draft EA 49.

monitoring at a time when the agency is facing massive reductions in funding and staffing.<sup>30</sup>

### Non-commercial thinning

- The Forest Service says that non-commercial thinning will 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.”<sup>31</sup>
  - The Forest Service should utilize a defined diameter limit rather than an average diameter limit since the latter would allow cutting larger diameter trees, as long as the overall average is kept below 9” DBH.

### Post-thinning fuels treatments

- The Forest Service acknowledges that “[o]pening the canopy and increasing crown spacing allows more solar radiation and wind to dry surface fuels, raising short-term wildfire intensity if ignition occurs.”<sup>32</sup> The Forest Service also acknowledges that slash from thinning “contributes to ground and surface fuels, which has the potential to increase future fire intensity and severity.”<sup>33</sup> Nevertheless, the Forest Service claims that “thinning combined with fuels treatments would reduce fire risk” and that “[f]uel loading after thinning would be monitored to determine if fuel loads are unacceptably high.”<sup>34</sup>
  - As discussed above regarding restocking, how does the Forest Service plan to monitor post-thinning fuel loads to ensure that fuel loads are not “unacceptably high”?
  - Documents obtained through FOIA show that while the Forest Service is “successful in implementing the mechanical treatment portions of [its] projects,” the agency has “fallen behind in the remainder of the work, including prescribed fire.”<sup>35</sup> The Forest Service must disclose its current status of post-mechanical treatment work. The Forest Service cannot continue to approve projects where only the logging portion of the project is accomplished and the “remainder of the work” is not implemented due to agency priorities, budget, and staffing.

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<sup>30</sup> See e.g., Dennis Webb, ‘I’m worried,’ former forest supervisor says about staff cut impacts on stewardship, *The Daily Sentinel* (May 17, 2025) (noting that the former forest supervisor for the White River National Forest “expects close to 7,000 of the agency’s 15,000 or 16,000 nonfire employees to be gone from the Forest Service by later this year.”) (Ex. 7).

<sup>31</sup> Draft EA 11.

<sup>32</sup> *Id.* at 42.

<sup>33</sup> *Id.* at 12.

<sup>34</sup> *Id.* at 12, 42.

<sup>35</sup> FY18 Restoration Budget (9/8/17 discussion) (Ex. 8, p. 1) (obtained in response to FOIA Request #2024-FS-R6-04259-F).

## Roads / OHV Trails

- The Forest Service claims that temporary roads that are constructed to facilitate logging “would be closed and rehabilitated.”<sup>36</sup>
  - The Forest Service needs to provide monitoring data that demonstrates the Forest Service has, in fact, closed and rehabilitated roads following implementation of past projects and the effectiveness of those rehabilitation efforts.
  - In the latest monitoring report for the MBS, the Forest Service does not provide any data on closure and rehabilitation of temporary roads. The only reference to this requirement simply states “[c]ontinue to require the decommissioning of temporary roads, constructed for the purpose of timber sales, at the completion of the sale.”<sup>37</sup> But how does the public know that such activities will continue if there is no evidence that temporary roads *are* being decommissioned and effectively rehabilitated?
  - The Forest Service should also provide a timeframe for closure and rehabilitation of temporary roads.
- The Forest Service plans to convert 13.17 miles of Evans Creek OHV Trail to roads for this project and keep the roads open to OHV use after project completion.<sup>38</sup>
  - The Forest Service should reconsider its plan to convert this OHV trail to roads and then keep the roads open to OHVs.
  - The Forest Service previously acknowledged that “[t]he compatibility of high intensity ORV use in LSOG 124c with its objectives of providing habitat for species associated with late successional forest should be evaluated since high recreation use is generally believed to adversely affect habitat suitability for most species.”<sup>39</sup> “In the long term,” the Forest Service continued, “this LSOG is not viable as an ORV area and alternative use areas should be considered.”<sup>40</sup>
    - If OHV use was “not viable . . . in the long term” for this area in 2001, the Forest Service needs to consider an alternative that evaluates closing this area to OHV use.
- The Forest Service says road reconstruction “is proposed.”<sup>41</sup>
  - The Forest Service provides no specifics on location or mileage of road reconstruction. For example, Table 7 presents a summary of transportation related activities proposed in Alternative 1.<sup>42</sup> While the table presents figures for proposed decommissioned and temporary roads, there are no such figures for proposed road reconstruction.<sup>43</sup>

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<sup>36</sup> Draft EA 17.

<sup>37</sup> Biennial Monitoring Evaluation Report for the Mt. Baker-Snoqualmie National Forest, 38, *available at* [www.fs.usda.gov/sites/nfs/files/r06/mbs/publication/Biennial%20Monitoring%20Evaluation%20Report%202023.pdf](http://www.fs.usda.gov/sites/nfs/files/r06/mbs/publication/Biennial%20Monitoring%20Evaluation%20Report%202023.pdf).

<sup>38</sup> Draft EA 17.

<sup>39</sup> Forest-Wide Late Successional Reserve Assessment, 51 (2001).

<sup>40</sup> *Id.*

<sup>41</sup> Draft EA 17.

<sup>42</sup> *See id.* at 18.

<sup>43</sup> *Id.*

- The Forest Service proposes 17.53 miles for road decommissioning.<sup>44</sup>
  - Guardians supports the decommissioning of these roads and urges the Forest Service to consider additional opportunities for decommissioning in the project area.

### Common Stand Exam Data

- The Forest Service says that it collected common stand exam (CSE) data for 32 stands in the project area.<sup>45</sup>
  - This represents just 40% of project area stands where logging is proposed. The Forest Service should disclose whether this complies with relevant manual and/or handbook policies for stand exams. If not, the Forest Service should collect CSE data for additional stands or explain why no additional CSE data is needed or required.

### Ecosystem Services

- The Forest Service states that “[e]cosystem services (water supply, wildlife habitat, air quality, and visual quality) are not included in the cost-efficiency analysis due to their complexity.”<sup>46</sup>
  - This is inaccurate and insufficient. The Forest Service maintains an “Ecosystem Services” website.<sup>47</sup> In 2007, the Pacific Northwest Research Station published a report called “Caring for Our Natural Assets: An Ecosystem Services Perspective.”<sup>48</sup> This report emphasized the role the Forest Service had in “reduc[ing] [its] environmental footprint and be[ing] the environmental leader we expect others to be.”<sup>49</sup> It also discussed the importance of “incorporat[ing] a management approach that sustains the flow of ecosystem services across the landscape” and to “resist the impulse to dismiss the ecosystem services concept as the latest in a series of attempts to redefine forestry.”<sup>50</sup> Indeed, the report confirms that “[e]conomists have long studied how to assign monetary value to public goods in an effort to account for environmental externalities.”<sup>51</sup> Now, 18 years after the publication of this report, the Forest Service cannot just ignore ecosystem services claiming that it is too complex.

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<sup>44</sup> *Id.*

<sup>45</sup> *Id.* at 35.

<sup>46</sup> *Id.* at 36.

<sup>47</sup> See [www.fs.usda.gov/ecosystemservices](http://www.fs.usda.gov/ecosystemservices).

<sup>48</sup> See [www.fs.usda.gov/ecosystemservices/pdf/collins\\_larry.pdf](http://www.fs.usda.gov/ecosystemservices/pdf/collins_larry.pdf).

<sup>49</sup> *Id.* at 8.

<sup>50</sup> *Id.*

<sup>51</sup> *Id.* at 7.

## Invasive Species

- The Forest Service has repeatedly acknowledged that “[i]nvasion of nonnative species ... is one of the most important issues in natural resource management today,”<sup>52</sup> and there is broad scientific consensus that the activities contemplated by the proposed action can significantly worsen the issue.<sup>53</sup> Indeed, the Forest Service admits that the proposed “commercial thinning would increase the risk of propagule introduction due to heavy equipment use and timber hauling on 45.79 miles of Forest Service haul roads, facilitating their spread within and beyond the project area.”<sup>54</sup> The Forest Service concludes that, in light of “future reductions in Forest Service capacity, the risk of activities affecting invasive plant introduction, establishment, and spread is *HIGH*.”<sup>55</sup> Even without the reductions in capacity, the Forest Service still says the risk of invasive plant introduction, establishment, and spread would be Moderate.<sup>56</sup>
  - Based on this, the Forest Service should prepare an EIS.

## Fisheries

- The Project area provides occupied habitat and designated critical habitat for three federally threatened species of fish: Puget Sound Chinook Salmon, Puget Sound Steelhead Trout, and Bull Trout.<sup>57</sup> The Forest Service characterizes the Carbon River as “the most productive salmonid habitat in the Puyallup Basin, providing crucial spawning and rearing grounds” for these and other species.<sup>58</sup> The Forest Service has determined that implementation of either action alternatives is likely to adversely affect Puget Sound Steelhead Trout, Puget Sound Steelhead Trout Critical Habitat, Bull Trout, and Bull

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<sup>52</sup> Roadless FEIS at 3-126; *see also* 36 C.F.R. §§ 219.8(a)(1)(iv), 219.10(8) (recognizing invasive species as “system driver” that must be addressed in agency planning); Bioregional Assessment of Northwest Forests at 28 (“The effects of invasive species are one of the primary concerns associated with maintaining ecological integrity across [Region 6].”); Invasives Program ROD at 1–2; U.S. Forest Service Manual § 2902 (2011) (setting agency objectives for preventing introduction and spread of invasive species); U.S. Forest Service, Invasive Species, <https://web.archive.org/web/20250312101927/https://www.fs.usda.gov/main/r6/forest-grasslandhealth/invasivespecies> (last visited May 23, 2025 (“Invasive species are one of the most serious challenges that affect natural resources worldwide.”)).

<sup>53</sup> Our comments focus primarily on invasive plant species, which will be the most directly impacted by the proposed amendment. However, this is not to suggest that other invasive species are not cause for serious concern in the planning area. “Invasive pathogens with significant effects on forests of the NWFP area include white pine blister rust (*Cronartium ribicola*), Port Orford cedar root disease (*Phytophthora lateralis*), and sudden oak death (SOD) (*P. ramorum*)[.]” Spies et al. (2018) at 175. And research suggests that the invasive barred owl—widely recognized as the most serious threat to the northern spotted owl—has a greater tolerance for disturbed ecosystems and younger forests, and is therefore also likely to benefit from these changes at the expense of its threatened native cousin. *See* U.S. Fish and Wildlife Service (2024) at 10; Bioregional Assessment at 28; Wiens et al. (2014) at 21–23, 32, 38–39.

<sup>54</sup> Draft EA 48.

<sup>55</sup> *Id.* (emphasis in original).

<sup>56</sup> *Id.*

<sup>57</sup> *Id.* at 65.

<sup>58</sup> *Id.* at 63.

Trout Critical Habitat.<sup>59</sup> Not surprisingly, the Forest Service acknowledges that there is the “potential for a significant environmental effect” on fisheries should the Project be approved and implemented.<sup>60</sup>

- This admission requires the preparation of an EIS.
- The Forest Service claims that “logging equipment would generally be excluded” from stream protection buffers “except where skid trails are necessary to cross streams.”<sup>61</sup>
  - The Forest Service should prohibit skid trails from crossing streams.

### **Wilderness, Inventoried Roadless Areas, and Mt. Rainier National Park**

- The Forest Service is proposing commercial and non-commercial logging adjacent to Mt. Rainier National Park and the Clearwater Wilderness as well as non-commercial logging adjacent to and within Inventoried Roadless Areas (IRAs).
- In the cumulative effects section for scenery, the Forest Service acknowledges that “clear cutting on neighboring lands [to the west and north] would continue to sustain a degraded visual quality.”<sup>62</sup> However, the Forest Service claims that the logging proposed in this Project “would have a neutral cumulative impact” and “continue to serve as [a] buffer” between the “highly managed landscapes” with clearcuts and the “visibly intact landscapes of the Clearwater Wilderness and Mt. Rainier National Park.”<sup>63</sup>
  - The Forest Service’s characterization of logging adjacent to and near the Clearwater Wilderness and Mt. Rainier National Park as a “neutral cumulative impact” is specious. The proposed logging would increase the “degraded visual quality” in the area, not be “neutral.” The Forest Service needs to consider the additive impacts to visual quality should the Project be approved and implemented.
  - The Forest Service should drop stands adjacent Mt. Rainer National Park and Clearwater Wilderness. The Forest Service should also drop stands adjacent to and within IRAs.

### **Climate Change**

- The Forest Service did not calculate fossil fuel emissions from equipment associated with project implementation because, [a]t this time, vehicle or equipment operations at this small scale cannot be calculated.”<sup>64</sup>
  - The Forest Service provides no explanation for its conclusory statement that vehicle and equipment emissions cannot be calculated for the Project. The Forest Service should reconsider calculating vehicle and equipment emissions from project implementation.

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<sup>59</sup> *Id.* at 65.

<sup>60</sup> Draft EA – Fisheries Effects Analysis, 1.

<sup>61</sup> Draft EA 64.

<sup>62</sup> *Id.* at 78.

<sup>63</sup> *Id.*

<sup>64</sup> *Id.* at 79.

- The Forest Service claims that “[b]elow ground carbon stocks would not be significantly impacted by the proposed action.”<sup>65</sup>
  - The Forest Service provides no analysis to reach this conclusion. The Forest Service should reconsider analyzing the Project’s impacts on soil carbon.

### **Pertinent Executive Orders**

- The Forest Service identifies various executive orders as “pertinent based on the nature of the project.”<sup>66</sup>
  - The Forest Service should disclose whether Executive Order 14225, which orders the “Immediate Expansion of American Timber Production,” is also “pertinent” to the Project and whether MBS staff have been directed to expedite NEPA review for this and other Projects in response to the promulgation of this executive order.<sup>67</sup>

### **Comment Period for the Draft EA**

Finally, Guardians wants to notify the Forest Service that these comments are timely. In the April 23 notice letter announcing the comment period on the Draft EA, the Forest Service stated that it would accept comments for “30 days **beginning on the date of publication of the legal notice** (April 23<sup>rd</sup>) in the paper of record (The Everett Herald and Courier Herald).”<sup>68</sup> While the Forest Service claims this is in conformance with the applicable regulation, it is not. The regulation states that comments on a proposed project documented in an EA “shall be accepted for 30 days **beginning on the first day after the date of publication of the legal notice.**”<sup>69</sup> Thus, these comments are timely even though the Forest Service removed the public portal for submitting comments a day early.

Thank you for the opportunity to comment.

Sincerely,



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<sup>65</sup> *Id.* at 81.

<sup>66</sup> *See id.* at 86-88.

<sup>67</sup> *See* Exec. Order No. 14,225, 90 Fed. Reg. 11,365 (Mar. 6, 2025).

<sup>68</sup> Carbon River Landscape Analysis Environmental Assessment Notice of Availability (Apr. 23, 2025) (emphasis added).

<sup>69</sup> 36 C.F.R. § 218.25(a)(1)(i) (emphasis added).