



## Washington State Chapter

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September 1, 2025

Objection Reviewing Officer,  
Region 6 Regional Forester,  
Pacific Northwest Region,  
USDA Forest Service,  
Attn: 1570/1950 Objections,  
1220 SW 3rd Ave,  
Portland, OR 97204

***Electronic submission of this Comment Letter*** was made via the Project Website at: <https://www.fs.usda.gov/r06/mbs/projects/65083>

**Re: OBJECTION to the Carbon River Landscape Analysis (CARLA) Project  
#65083 Mt. Baker-Snoqualmie National Forest**

Ladies and Gentlemen,

Please accept this Letter as the Sierra Club, Washington State Chapter, National Forest Committee's Objection to the referenced Project.

*The Responsible Official for this Project is Erin Uloth, Mt. Baker-Snoqualmie Forest Supervisor.*

*Except as stated within this Objection Letter, the Sierra Club restates, and incorporates herein by reference, all of its Comments in the Sierra Club Comment Letter dated May 21, 2025 to Brian McNeil, Acting District Ranger, Snoqualmie Ranger District, (referred to herein as the "Comment Letter"), as Objections to the proposed Project.*

*In addition, except as stated in this Objection Letter, the Sierra Club does not accept the Forest Service's statements and conclusions in the July, 2025 Draft Notice of Decision and FONSI, the Appendix G July, 2025 Responses to Comments, and the July, 2025 Final Environmental Assessment, insofar as the statements and conclusions address specific comments and/or objections raised by the Sierra Club.*

Therefore, the Sierra Club is submitting this Objection Letter.

**1. Amendment to the Survey and Manage Protocol.** *The following objection concerns an issue that arose after the designated opportunity for formal comment.* The Forest Service added to the project, after the closure of the Comment Period, a proposed project specific Amendment to the Survey and Manage provisions applicable to this project and to the Mt. Baker-Snoqualmie Land Resource and Management Plan (the "LRMP"). **The Sierra Club objects to the proposed Amendment to the Survey and Manage provisions as follows:**

**a) The Forest Service's lack of notice of the proposed Amendment to the public.** Per page 103 of the Final Environmental Assessment (the "EA"), the Forest Service has merely given notice to those members of the public who had submitted Public Comments during the Comment Period and who are entitled to notice for the Objection process. That limited notice by the Forest Service does not reach the public at large.

i) Persons and entities specifically interested in the Survey and Manage Standards and Guidelines ("SM S&G") might not have anticipated that the Forest Service would propose an amendment to the SM S&G, released on July 22, 2025 only to those members of the public who submitted Public Comments.

ii) The original notice of the proposed project was issued on April 23, 2025, and did not include any issues regarding SM S&G. Persons interested in the SM S&G would not have anticipated that the Forest Service would add an amendment to the SM S&G, and thus did not submit comments, and as a result were not on the Forest Service's notice list for this Amendment.

iii) Availability of the results of Surveys to the public during a NEPA process is a *substantive issue*, contrary to the statement in the Draft Final Decision on page 103 of the EA, and is in fact related to the '*effects of the CARLA project*'.

- Referring to the following paragraph on page 24 of the ATTACHMENT 1 to the Record of Decision for Amendments to the Survey and Manage, Protection Buffer, and Related Mitigation Measures Standards and Guidelines (the "SM S&G"):

*"Timing Requirements for Pre-Disturbance Surveys*

*The intent of “surveys prior to habitat-disturbing activities” is to **gather relevant information during the NEPA process so that it is available for the decision-maker before actions are taken.** Ideally, this information would be available to the Interdisciplinary Teams during preparation of an EA or Draft EIS so it could be used in project analysis, formulation of alternatives, and evaluation of effects. Required surveys should be completed and their results included in an EA or Draft EIS whenever practicable. **This would have the added advantage that results would be available during the public review and comment process.**”*

The Forest Service has failed to provide adequate public notice for this substantive issue of the proposed Amendment, as provided in April 2025, including, without limitation, on the Project Website, the MBS SOPA announcement, and emails to recipients on the Forest Service’s listserve. **The Sierra Club requests that the Forest Service provide full public notice of the proposed amendment, and an opportunity for public comment to the public at large.**

**b) The Sierra Club requests that the Forest Service provide detailed information on the ‘evolving circumstances and availability of new information’ as stated on page 103 of EA/Draft Final Decision** that appears to justify the failure to provide notice to the public at large:

*“This amendment is being proposed later in the planning process due to evolving circumstances and the availability of new information”*

**c) The Sierra Club requests that the Forest Service provide the citation source re authority for a one standard amendment to the Northwest Forest Plan**, per page 4 of the Forest Plan Amendment Analysis.

*“The CARLA Project may amend up to one standard in the Northwest Forest Plan, as amended by the 2001 Survey and Manage ROD.”*

**d) In addition, the Forest Service’s proposed amendment to change the date when Survey and Manage reporting is done does not comply with page 58 of the 2001 Record of Decision and Standards and Guidelines for Amendments to the Survey and Manage, Protection Buffer, and other Mitigation Measures Standards and Guidelines (the “2001 ROD S&M. See Page 58 of 2001 ROD S&M:**

*“9. Authority to Amend or Modify this Decision*

*As with other parts of the Northwest Forest Plan, amendments of forest and district plans that would modify the standards and guidelines established by this Record of Decision will be coordinated through the Regional Interagency Executive Committee (RIEC) and the Regional Ecosystem Office (REO) as described in the original Northwest Forest Plan Record of Decision.”*

Although page 58 of the 2001 ROD S&M also states an expectation of *minimal modifications*, which would not require formal consultation with the RIEC and the REO, the Sierra Club finds that the proposed change in timing of the Survey and Manage process is not *minimal*. As proposed, **the Sierra Club requests** that the Forest Service obtain approval of REO and RIEC as changing the timing of the conduct of Survey and Manage is *not minimal*.

e. Although the description on pages 8, 9 and 103 of the Final EA provides justification for the Amendment due to the length of term of the Project, the Sierra Club does recognize that a thirty (30) year-long project has practical ramifications if the Surveys were merely conducted in 2025. Therefore, **the Sierra Club requests that the EA be amended to provide full public notice, and an opportunity for public comment, of the results of each of the project Surveys when actually conducted.** Such public notice and opportunity for public comment would meet the intent of the SM S&G, at page 24.

**2. Permitted Treatment in IRA.** *The following objection concerns an issue that arose after the designated opportunity for formal comment.* The Forest Service posted on the project website the following two documents which were not available during the Comment Period:

- the Deputy District Forester’s May 16, 2025 Review and Concurrence with 2001 Roadless Rule Exception, Carbon River Landscape Analysis regarding IRAs in the project area (the “IRA Concurrence”); and
- the Briefing Paper ***Topic: Proposed Activities Within the Clearwater Inventoried Roadless Area, Date: April 29, 2025*** regarding IRAs in the project area (the “IRA Briefing Paper”).

**a) Changes needed to the EA to properly reflect the terms of the IRA Concurrence and the IRA Briefing Paper.**

**The Sierra Club objects** to the Forest Service’s failure to include in the EA itself the provisions specifically limiting the treatment in IRAs to the following aspects of the project raised in the IRA Concurrence and in the IRA Briefing Paper:

- i) **average diameter of trees at 9”**, hand cut; and
- ii) **incidental** cutting of larger trees not to exceed 20” DBH, all merely for purposes described in the IRA Briefing Paper and in the IRA Concurrence.

See the following paragraphs from the referenced documents:

PAGE 1 OF IRA CONCURRENCE:

*“You are proposing to noncommercially thin generally small diameter trees on 83.4 acres of the Clearwater IRA. The average diameter of thinned trees would be nine inches diameter at breast height (dbh); incidental trees up to 20 inches dbh may be cut for creation of wildlife habitat or to address specific resource needs such as opening small gaps or removing hazards.”*

*“I have reviewed the attached information, and I concur that the cited exception applies and that the project, as described, is consistent with the Roadless Rule.”*

PAGE 2 OF IRA BRIEFING:

*“Non-commercial hand cutting, girdling, topping, or inoculation would occur. Trees would be initially left on-site, but a fuels treatment would follow. In some cases, woody material would be piled or distributed on site to mimic natural down wood features. Incidental cutting, girdling, or topping of larger-diameter trees (up to 20 inches dbh) may occur on a limited basis to create wildlife snags, down wood, or openings.”*

*“The average diameter of trees removed would be less than 9 inches. Some larger trees (up to 20 inches) may be cut incidentally for wildlife habitat creation (e.g., snags, down logs) or to address specific resource needs such as opening small gaps or removing hazards.”*

As written:

- i) page 14 of the EA is the only location of a reference to 9” DBH, and that appears in a paragraph on Non-Commercial Thinning (“NCT”) for the entire project. There is wording on page 14 that *caps the cutting in IRA at 20” DBH*, but there is no reference to the limitation of such cutting as *being merely ‘incidental’* as stipulated in the IRA Concurrence;
- ii) Table 6 on pages 14 and 15 of the EA does include acreage contemplated for the IRAs, but does not have any further limitations on the treatment in IRAs; and
- iii) page 91 of the EA, refers to *incidental* cutting but does not provide the full context of the stipulations in the IRA Concurrence.

**The Sierra Club requests** that the EA should be revised to include all provisions of the IRA Concurrence in one section or paragraph.

**In addition, the Sierra Club requests that the word ‘incidental’ be defined to indicate the maximum number of trees per acre that would constitute ‘incidental’ regardless of** terrain and species of trees, or CWD, Snag Enhancement, or Cavity or CWD recruitment, or

girdling, topping or inoculating trees with fungus. The IRAs should not have the same amount of enhancement treatment for habitat as would be done in non-IRA forests, due to the limitation in the IRA Concurrence of only 'incidental' for trees up to 20" DBH.

**The Sierra Club further requests** that the Forest Service revise the EA to include a new specific section on IRAs in the Section on Alternative 1 on Treatment components, as well as revise the Section on page 91 on IRAs, that includes all of the IRA Concurrence's specific stipulations and limitations for NCT in IRAs.

Incorporating by reference the IRA Concurrence and the IRA Briefing Paper, as well as the Roadless Area Effects Analysis, is insufficient for this important and specific limitation. The application of the NCT provision to LSR forests permits the cutting of up to 20" DBH in the IRA without the stipulation of '*incidental*' that is specifically provided in the IRA Concurrence, and thus the LSR NCT would permit cutting many more trees than is provided in the IRA Concurrence. That level of cutting is not permitted in IRAs, and the description of NCT in IRAs must be revised.

**b) Changes needed to the Draft Decision Notice to properly reflect the terms of the IRA Concurrence and the IRA Briefing Paper.**

The **Draft Decision Notice** on page 102 of the EA refers to 80 years-old trees in the IRA; however, the IRA Concurrence does not discuss 80 years-old trees and instead stipulates only the limits discussed above.

**The Sierra Club requests** that the Forest Service revise the Draft Decision Notice to delete the sentence copied below, as found on page 102 of the EA, in the Section titled *Treatments in IRA*, regarding stands approaching 80 years of age.

*"Many of these stands are nearing 80 years of age, after which active management is restricted under the Northwest Forest Plan, making immediate action necessary to promote old-growth characteristics and habitat quality. Including IRA stands in this project is especially important because no additional planning is anticipated in this area for decades."*

3. **Appendix D** *The following objection concerns an issue that arose after the designated opportunity for formal comment.* The Forest Service created Appendix D after the expiration of the comment period. **The Sierra Club requests**, as discussed with the Forest Service's Environmental Coordinator, that Appendix D be revised so that the reference to the Inventoried Roadless Areas treated acreage refers to 83.3 acres rather than 192 acres as presently written.

4. **LSR REO Concurrence** *The following objection concerns issues that arose after the designated opportunity for formal comment.*

**The Sierra Club Objects to the LSR REO Concurrence which permits cutting trees 20” to 24” DBH to achieve 35% SDI.** The Density approach is not included in REO Memo 964 nor the NWFP. REO Memo 964 does not include any discussion regarding SDI Density. The addition by the REO of permitting a focus on achieving 35% SDI and relying on the safety issue, regarding that the cut trees are too dense to leave on ground or to harvest, had been previously addressed merely by removing CWD from the site, which again is not permitted under Memo 964, but would appear to have less impact on the protected LSR than allowing the Forest Service to cut up to 24” DBH to achieve 35% SDI. Note that although the REO Concurrence is dated March 5, 2025, it was not posted to the Project’s public website until July, 2025 and thus constitutes a new issue that arose after the designated opportunity for formal comment.

5. **Draft Final Decision Notice- Monitoring Plan.** *The following objection concerns issues that arose after the designated opportunity for formal comment*

**The Sierra Club Objects** to the minimal monitoring described in the Draft Final Decision , which is not even included in the EA. It is unclear if monitoring will occur during implementation or only after completion of individual stands or after completion of project after 30 years. The Sierra Club Requests that the components of monitoring be amplified to follow the monitoring requirements defined under the NWFP, and be included not only in the Final Decision but also in the EA.

#### **A Monitoring Plan must be described and developed**

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. Is the project “increasing structural diversity” and “building resiliency”?

Additional questions which should be answered during monitoring review, given the project design, and 30-year duration and multi-phase implementation, and how it’s carried out, are conditions changing that result in lack of efficacy (i.e. climate change)? What are measurable parameters that can be used to chart the success of the program?

Please note that monitoring of Forest projects is a requirement of the Northwest Forest Plan (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)*

A monitoring plan would clearly describe in the EA 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. This would describe when, why, and how they will make changes to future phases of the project as a result of such monitoring.

6. **Draft Final Decision- Issue with REO Concurrence re increasing from 20” to 24” DBH** *The following objection concerns issues that arose after the designated opportunity for formal comment*

Page 100, the Draft Decision Notice states the following regarding **the LSR REO Concurrence**:

*“They concurred with the Forest’s findings that the proposed Project’s actions meet the objectives of the Northwest Forest Plan (NWFP) Standards and Guidelines (S&G’s) for LSRs, including the removal of trees over 20” DBH where necessary to achieve desired stand structure. With this determination, subsequent project level REO reviews are not needed for implementation of this project (see 2394 CARLA Project REO Concurrence).”*

**The Sierra Club objects to the language as written and requests** that the language on page 100 should be revised to change ‘over 20” DBH’ to **“20” DBH to 24” DBH”** as without the change, contractors and stewards reviewing only the Decision could conclude that the authorization permits the cutting of any trees larger than 20” DBH. Since the REO cap is 24” DBH, that cap must be stated in the Final Decision. Otherwise, the Sierra Club Objects to the language as written.

7. **Draft Final Decision. MA 15** *The following objection concerns issues that arose after the designated opportunity for formal comment*

Page 102 of the Draft Decision Notice states:

*“Additionally, opportunities to improve winter forage for mountain goats in Management Area 15 are limited, and thinning near escape terrain would provide needed benefits. Without treatment, habitat connectivity and the effectiveness of surrounding restoration would also be reduced.”*

**The Sierra Club requests that the reference to MA 15 on page 102 be clarified** to indicate that the discussion on page 102 re IRA approach applies *only to MA 15 within IRAs*. There are several MA 15 units in the Project Area which are not included in the IRA and are not included in the Project for treatment. Otherwise, the Sierra Club **Objects** to that paragraph, as the other MA 15 units are not scheduled for treatment.



8. **The Sierra Club requests that the BioOp for USMFS be posted on the Project Website.**

9. **Forest Service Responses to Sierra Club Comment Letter.** The Sierra Club appreciates and acknowledges certain of those of the Forest Service's Responses to the Sierra Club's comments as indicated in Appendix G to the Final EA. The accepted Responses are listed below. Note that the page references below are to Appendix G, as included in the combined Appendices document:

FS Responses 1-6, pages 49-50

FS Response 11, page 50

FS Response 16, page 52

FS Response 22, page 53,

The Sierra Club accepts the FS's Response 22, although it would have been appropriate for the FS to mention that the Hydrology Effects Report on page 7 disclosed that an estimated 80% of the roads were surveyed and culvert issues on those roads were identified as described in the Hydrology Effects Report.

FS Response 29, page 55

FS Response 35, page 56

FS Responses 38 and 39, page 57

FS Responses 42, page 57

The Sierra Club accepts the FS's Response 42, although we suggest that since the phrase 'unclassified road' occurs in the EA, the definition should be included in the EA itself rather than merely in the Transportation Effects Analysis.

FS Response 43, page 57

FS Response 46, page 58

FS Response 62, page 61

The FS's wording on page 12 of the EA answers our Comment. The Sierra Club suggests that the FS's Response should refer to the wording on page 12: *"Treatment would not be implemented in stands 80 years or older at time of harvest."* See FS Response 64.

FS Response 64, page 61

FS Response 65, page 62

The Sierra Club asks that the Response be added to the EA.

FS Response 68, page 62

FS Response 82 -84, page 64- 65

FS Response 86, page 65.

**Except as otherwise stated in this Objection Letter, the Sierra Club restates and incorporates herein by reference as *Objections* all of its comments provided in the Sierra Club Comment Letter dated May 21, 2025.**

We are not further reiterating our arguments and comments raised in the Comment Letter, and we let the Comment Letter, as incorporated herein by reference, subject to the terms of this Objection Letter, speak for itself as the Sierra Club's Objection.

We appreciate the opportunity to comment on this important federal action. Please keep us informed about next steps in the planning process and do keep us on the mailing list for any follow-on actions.

Please address future communications, emails or telephone calls regarding this project to the National Forest Committee, WA Chapter of the Sierra Club, to the following:

- Don Parks at [dlparks398@gmail.com](mailto:dlparks398@gmail.com) and (425) 891-2025
- Amy Mower at [almower@earthlink.net](mailto:almower@earthlink.net) and (360) 305-2922 and
- Cindy Brown at [jjrogersmail@yahoo.com](mailto:jjrogersmail@yahoo.com) and (206) 698-4590

Sincerely,

**SIERRA CLUB, WA State Chapter  
National Forest Committee**

Don Parks, Co-Chair and member of the National Forest Committee  
Amy Mower, member of the National Forest Committee  
Cindy Brown, member of the National Forest Committee

**cc. Lindsey Hamilton**