

Data Submitted (UTC 11): 2/12/2026 8:00:00 AM

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WildEarth Guardians ([ldquo]Guardians[rdquo]) submits the following comments on the Station Butte Environmental Assessment ([ldquo]EA[rdquo]). The project area spans approximately 32,770 acres of the Middle Fork Ranger District in the Willamette National Forest. The proposal includes nearly 4,000 acres of commercial thinning in upland areas and over 1,050 acres of thinning in Riparian Reserves.

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[rsquo]s broader efforts to increase timber volume output.

In April 2022, the Forest Service issued a report outlining how it could [ldquo]achieve and sustain[rdquo] a higher timber target.¹ 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, [ldquo]higher than any period in the previous few decades.[rdquo]² This increase in timber volume had already [ldquo]outpaced the agency[rsquo]s ability to prepare enough project areas and has exhausted most of the agency[rsquo]s available NEPA-approved projects.[rdquo]

Despite that, the Forest Service said it was [ldquo]increasing [its] effort in preparatory work to achieve and sustain[rdquo] even [ldquo]higher volume sold output[s].[rdquo]⁴ In order to [ldquo]develop, implement, and administer more timber sales to attain an increased target,[rdquo] the Forest Service stated that [ldquo]a reallocation of agency support staff for administrative, human resources, finance, information technology, and related functions must also be prioritized to support this effort. The Forest Service singled out the Pacific Northwest as one of three regions that [ldquo]should have the greatest increase in total volume sold[rdquo] in order to attain and sustain higher timber targets

Documents obtained by Guardians through the Freedom of Information Act (FOIA) reveal the pressure Forest Service staff are under to meet assigned timber targets, including in the Pacific Northwest. In notes provided to an incoming Acting Assistant Director in 2015, regional staff explained that the Washington Office [ldquo]will probably have continued asks for more volume[rdquo] and that forests are [ldquo]SOL if they can[rsquo]t get the NEPA done.[rdquo]⁸ The incoming director was also told [ldquo]don[rsquo]t forget how important the WIL is! [rdquo] regarding meeting regional timber volume targets.⁹ The push to avoid being a forest that is [ldquo]SOL if they can[rsquo]t get the NEPA done[rdquo] almost certainly means that corners are being cut wrap up NEPA processes as quickly as possible, which only increases the likelihood for unanticipated and needless environmental impacts

For example, in a 2017 audit of the Malheur National Forest[rsquo]s timber program, the Regional Office admitted that:

In the past 3-4 years, several forests in the region have had timber sales containing units that have not been analyzed in the NEPA document and/or were inconsistent with the preferred NEPA decision. Three common factors between these sales were: the lack of frequent and open communications as the project moved from design to implementation, no review of the contract or task order package prior to advertisement or award, and

little involvement by line officers

Which forests were these? Did this include the Willamette National Forest? In addition to the [three] common factors, [what other factors led to timber sales in these forests containing units that have not been analyzed in the NEPA document and/or were inconsistent with the preferred NEPA decision?]

Despite its knowledge that timber sale implementation on [several forests in the region] included [units that had not been analyzed in the NEPA document and/or were inconsistent with the preferred NEPA decision,] the Regional Office continued to push forests to do more to increase timber volume output, even to the point of reminding staff that their jobs depended on it. In December 2017, former Regional Forester James Pena sent a letter to forest supervisors in Region 6 stating:

[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

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 that Mt. Baker-Snoqualmie National Forest staff were [very concerned of not meeting this year's timber target as a result of T&E issues.]¹² 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.]¹³ In other words, the Regional Office's program for protecting and recovering threatened and endangered species is, at best, ancillary to the agency's timber program.

Following the 2022 Timber Targets Report, in February 2023, the Regional Office unveiled a new [3+1 Model] intended to [expedite the pace and scale of vegetation management] in the Pacific Northwest. The [3] refers to [three minimum years of NEPA-approved shelf-stock, which could be [one large-scale project or multiple smaller projects that clear timber volume actions over a multiyear window.]¹⁵ The [1] refers to [one year of sale prep shelf-stock, which is a NEPA-approved project readied for project implementation.] According to the Forest Service that means that [all the prep work done—]all the field work is done; the units have been identified; the timber is marked; you've got a cruise that provides a volume. You're ready to put together the contract and the maps] for implementation.¹⁶ Executing the 3+1 Model requires [all hands on deck to do what is needed to move the machine forward.]

That same month, the Regional Office ordered a timber target increase in the middle of the fiscal year, assigning an additional 73 million board feet (MMBF) for eight national forests to sell by the end of that fiscal year. Internal comments about the mandated increase for one of these forests, the Siuslaw National Forest, registered [complaints] from staff that the agency was [sacrificing aquatics] for an additional 5 MMBF of timber volume sold.¹⁸ Undeterred, the Regional Office met with the Federal Timber Purchasers Committee (FTPC) two months later to assure the timber industry that the agency is [seeking efficiencies with NEPA documents] and is [going to be as aggressive as possible in meeting the 575 [MMBF] target] for FY23, even while acknowledging that it is a [high bar to meet.]

That aggressiveness to get projects approved and timber sales under contract is evident in a June 2023 [timber target check-in] meeting. During this meeting, Region 6 leadership bluntly told its staff that [we either meet our target or not, period] and they had [a lot of ground to make up] before the end of the fiscal year because their [numbers are dismal.] In order to drive the point

home, Region 6 leadership explained that because they [ldquo]came up short last year[rdquo] it [ldquo]set a bad precedent that R6 is not a good investment.[rdquo] As a result, Region 6[rsquo]s [ldquo]NFTM dollar were reduced and sent to R8 & 9.[rdquo] In other words, the Forest Service[rsquo]s Washington Office punishes regions that do not meet their assigned timber target, creating a perverse incentive to be [ldquo]as aggressive as possible[rdquo] to meet that target, even perhaps, if it means [ldquo]sacrificing aquatics[rdquo] and disregarding impacts to threatened and endangered species.

And all of this was before the mandate for the [ldquo]immediate expansion[rdquo] of timber production even further under Executive Order ([ldquo]EO[rdquo]) 14225.²³ The region[rsquo]s timber target for FY26 is 622 MMBF,²⁴ an 8 percent increase from just two years ago, which the Regional Office already considered a [ldquo]high bar[rdquo] that would require its staff to be as [ldquo]aggressive as possible[rdquo] to meet.

The Forest Service must consider whether the current trajectory it is on is [ldquo]the most judicious use of the land.[rdquo] When Congress enacted NFMA, it recognized that because [ldquo]the majority of the Nation[rsquo]s forests and rangeland is under private, State, and local governmental management,[rdquo] it is those [ldquo]nonfederally managed renewable resources[rdquo] that provide the basis for [ldquo]the Nation[rsquo]s major capacity to produce goods and services[rdquo][mdash]not publicly owned and federally managed lands. In fact, Congress required the Forest Service to [ldquo]reduce pressures for timber production from Federal lands.[rdquo]

Instead of seeking ways to reduce pressures for timber production from Federal lands, EO 14225 and projects implementing the EO do the exact opposite by mandating the Forest Service to [ldquo]fully exploit our domestic timber supply[rdquo] and [ldquo]facilitate increased timber production[rdquo] from National Forest lands in a manner that [ldquo]reduce[s] time to deliver timber[rdquo] to market.²⁸ EO 14225[rsquo]s mandate for the [ldquo]immediate expansion[rdquo] of timber production from National Forests is impermissibly based on what [ldquo]will give the greatest dollar return or the greatest unit output[rdquo] of timber in violation of NFMA.²⁹ Even before this EO was issued, timber volumes were at their highest levels in decades and agency staff were struggling to meet the Washington Office[rsquo]s calls for increased volumes and expressing concerns that such calls were [ldquo]sacrificing aquatics.[rdquo] Now, the agency is ordered to meet even higher timber targets, which cannot reasonably be accomplished without further impairment of the productivity of the land.

Roads

Twenty-five years ago, the Forest Service recognized the challenges related to its oversized and deteriorating road system. On January 12, 2001, the Forest Service promulgated the Roads Rule (referred to as [ldquo]subpart A[rdquo]).³¹ The Roads Rule created two important obligations for the agency. One obligation is to complete a Travel Analysis Report and identify unneeded roads to prioritize for decommissioning or to be considered for other uses.³² Another obligation is to identify the minimum road system needed for safe and efficient travel and for the protection, management, and use of National Forest system lands.

In 2015, the Willamette National Forest took the first step and completed its travel analysis report, which it called a Road Investment Strategy (RIS). ³⁴ The next step under subpart A is to consider the valid portions of the RIS and begin to identify and implement the minimum road system in the analysis of site-specific projects of the appropriate geographic size under NEPA.³⁵ The minimum road system is the road system the Forest Service determines is needed to:

- * [ldquo]meet resource and other management objectives adopted in the relevant land and resource management plan[rdquo];
- * [ldquo]meet applicable statutory and regulatory requirements[rdquo];
- * [ldquo]reflect long-term funding expectations[rdquo]; and
- * [ldquo]ensure that the identified system minimizes adverse environmental impacts associated with road

construction, reconstruction, decommissioning, and maintenance

The Forest Service should identify the minimum road system for particular forest segments by analyzing whether a proposed project is consistent with the relevant portions of the RIS and considering the minimum road system factors under 36 CFR 212.5(b)(1) for each road the agency decides to keep as part of the specific project

Subpart A directs the agency to [ldquo]identify the roads on lands under Forest Service jurisdiction that are no longer needed,[rdquo] and therefore should be closed or decommissioned.³⁸ The rule refers to all roads, not just National Forest System roads. The rules define a road as [ldquo][a] motor vehicle travelway over 50 inches wide, unless designated and managed as a trail.[rdquo]³⁹ The Forest Service must assess these proposed actions in relation to the risks and benefits analysis in the RIS, as well as the factors for a minimum road system, with the goal of minimizing adverse environmental impacts. This would also be consistent with Region 6 guidance directing forests to identify the minimum road system for precisely this type of project

The impacts from roads to water, fish, wildlife, and ecosystems are well documented in scientific literature. The following is just a small list of examples:

- * Increased sedimentation in stream beds has been linked to decreased fry emergence, decreased juvenile densities, loss of winter carrying capacity, and increased predation of fishes, and reductions in macro-invertebrate populations that are a food source to many fish species (Rhodes et al. 1994, Joslin and Youmans 1999, Gucinski et al. 2000, Endicott 2008).
- * Roads can act as barriers to [fish] migration (Gucinski et al. 2000). Culverts in particular often interfere with sediment transport and channel processes such that the road/stream crossing becomes a barrier for fish and aquatic species movement up and down stream.
- * Where both stream and road densities are high, the incidence of connections between roads and streams can also be expected to be high, resulting in more common and pronounced effects of roads on streams (Gucinski et al. 2000).
- * Roads and trails impact wildlife through a number of mechanisms including: direct mortality (poaching, hunting/trapping) changes in movement and habitat use patterns (disturbance/avoidance), as well as indirect impacts including alteration of the adjacent habitat and interference with predatory/prey relationships (Wisdom et al. 2000, Trombulak and Frissell 2000).
- * Forman and Hersperger (1996) found that in order to maintain a naturally functioning landscape with sustained populations of large mammals (such as elk), road density must be below 0.6 km/km² (1.0 mi/mi²)

The Forest Service has a substantive duty to address its over-sized road system.⁴¹ Yet there is no objective in the EA to reduce the size of the road system in the project area. That is a missed opportunity considering the agency acknowledges the density of the existing [ldquo]extensive road system[rdquo] exceeds [ldquo]levels commonly associated with elevated stream sedimentation.[rdquo]

We understand that the Regional Forester recently directed forests to defer roads-related decisions that would decrease public access because the Travel Management regulations and policy are under review. The Regional Forester[rsquo]s direction is premature and arbitrary because it only defers Travel Management decisions for actions that would close or decommission roads. Other Travel Management actions, like road reconstruction that could change road maintenance levels, are not being deferred. The Forest Service should consider closing and decommissioning roads in the project area in order to fulfill its obligations to identify a minimum road system and unneeded roads and to restore terrestrial and aquatic habitats.

The Forest Service also proposes nearly 7 miles of temporary roads to facilitate project implementation. Considering the [ldquo]extensive road system[rdquo] that already exists in the project area, the Forest Service should reconsider the need for additional temporary roads. If temporary roads are constructed, the Forest Service claims such construction [ldquo]would only occur during the dry season.[rdquo]⁴³ However, none of the

project design features (PDFs) appear to explicitly incorporate that language. The Forest Service should include a PDF that incorporates the above language and strengthen it to [ldquo]shall only occur during the dry season.[rdquo]

Soils

The forest plan states that the [ldquo]total area of cumulative detrimental soil conditions should not exceed 20% of the total acreage within the activity area, including roads and landings.[rdquo]44 The [ldquo]activity area[rdquo] is the [ldquo]total area for which a ground-impacting activity is planned,[rdquo] including [ldquo]individual units of a timber sale[rdquo] and [ldquo]the transportation system (and landings) directly in and adjacent to the activity area.[rdquo]45 The Forest Service must consider past, present, and future activities when evaluating soil conditions.

The EA does not disclose specifics about detrimental soil conditions in the project area. The Forest Service does state that the project includes [ldquo]decompaction in units where pre-project detrimental soil compaction exceeds 20% of the unit area.[rdquo]47 But this does not appear to be incorporated in the PDFs. Also, as written, there is no indication that the proposed decompaction would actually reduce detrimental soil conditions below 20% of the unit area. The Forest Service should include a PDF that restricts ground-impacting activities in areas where detrimental soil conditions exceed 20%. The Forest Service should also consider a PDF that requires decompaction below 20% in areas that exceed that threshold and where ground-impacting activities are planned.

Riparian Reserves

The Forest Service is proposing over 1,050 acres of thinning in Riparian Reserves. The proposed thinning would reduce canopy cover to as low as 40% with a minimum of 60 trees/acre. Commercial gaps in Riparian Reserves would be up to 0.5 acres.

First, the Forest Service should also consider an alternative that either removes commercial thinning from Riparian Reserves or reduces the level of activities from what is currently proposed. Second, according to the EA, there are 32 units that would have wider no-harvest buffers to exclude thinning in Riparian Reserves where the desired conditions are already met. The Forest Service should identify and delineate these units and include them on maps.

Finally, we note that the Forest Service relied, in part, on the Fall Creek Watershed Analysis to derive [ldquo]project area landscape conditions.[rdquo]48 Published in 1995, this analysis is woefully out of date for deriving current landscape conditions. We understand the Forest Service supplemented this with more recent geospatial data but it is a reminder that the Northwest Forest Plan intended watershed analyses to be updated. Even though Fall Creek is not a Key Watershed, the need for an updated watershed analysis remains as much has changed over the past 30 years.

Conclusion

The Forest Service is in the process of an [ldquo]immediate expansion[rdquo] of logging on national forest lands. The Pacific Northwest has been identified as one of the region[rsquo]s that [ldquo]should have the greatest increase in total volume sold[rdquo] in order to meet higher timber targets. However, the Forest Service cannot base its decisions on what [ldquo]will give the greatest dollar return or the greatest unit output[rdquo] of timber.

The Forest Service should ensure there are enforceable PDFs regarding temporary roads and soils, as described above. The Forest Service should also consider an alternative excluding or reducing the level of activity in Riparian Reserves.