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WildEarth Guardians (Guardians) respectfully submits the following comments in response to the U.S. Forest Service's Draft Environmental Assessment (EA) for the Steeple Rock Rigdon Project (Project) in the Willamette National Forest. Guardians is a nonprofit conservation organization with offices in Oregon, Washington, 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 is proposing 3,169 acres of commercial logging and 288 acres of noncommercial logging in managed stands less than 80 years old. The Forest Service is also proposing about 1,450 acres of "fuel reduction and fire resiliency" activities and another 410 acres of roadside fuel treatments. 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, the Forest Service states the Multiple-Use Sustained Yield Act (MUSYA) and National Forest Management Act (NFMA) "guide the Forest Service to sustainably harvest trees."¹ In announcing this "multiple-use" mandate, however, 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."² 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."

When Congress passed 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."⁴ 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."⁵ Congress also required the Forest Service to "reduce pressures for timber production from Federal lands."⁶ 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/regions that meet their targets and punishes forests/regions 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 on what "will give the greatest dollar return or the greatest unit output" of timber. That focus on timber targets is also is 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.⁷ 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."⁸ 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."⁹ The Forest Service said it had "increased training on the use of the new authorities" in order to "continue the expansion of the timber program[.]"

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."¹¹ 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]."¹² 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."

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.¹⁴ 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."

In February 2023, the Forest Service increased the national timber target to 4 BBF.¹⁶ The Pacific Northwest Region's timber targets were set at 575 million board feet (MMBF) in FY23, increasing to 653 MMBF in FY24. 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 notes provided to an incoming Acting Assistant Director, regional staff explained that the Washington Office "will probably have continued asks for more volume" and that forests are "SOL if they can't get the NEPA done."¹⁸ The notes went on to state that former Regional Forester Jim Pena had been "less than impressed with how we have implemented all the new authorities in the 2014 Farm Bill" and that he "is especially interested in the Good Neighbor Authorities with States."¹⁹ The notes further stated that forests should not be "so hesitant in using the 3000 acre CE authority inside insect and disease designated areas."²⁰ Finally, and particularly relevant to this project, the notes emphatically stated "don't forget how important the WIL is!"

The push to avoid being a forest that is "SOL if they can't get the NEPA done" almost certainly corners are being cut, resulting in unanticipated and unnecessary environmental impacts. For example, in a 2017 audit of the Malheur National Forest's timber program, the Regional Office made a striking admission:

[i]n 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 the Regional Office's 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.

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."²⁴ 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."²⁵ It should go without saying that the focus of the manager of the Region's TES Program should be for threatened and endangered species, not whether a national forest meets its timber target.

In 2023, a mid-year increase of the Siuslaw National Forest's timber target resulted in "complaints" from staff that the agency was "sacrificing aquatics for additional 5 mmbf."²⁶ 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.

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."²⁸ As a result, Region 6's "NFTM dollar were reduced and sent to R8 & 9."²⁹ 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."

With all of this in mind, we provide the following specific comments on the Draft EA

II. Specific Comments on the Draft EA

Variable Density Thinning

* The Forest Service states that "following treatment, the stands would average 52% overstory canopy cover."³⁰ Later in the EA, the Forest Service states that "managed stands currently average about 80% canopy cover and thinning is expected to reduce this to about 52%, allowing canopy cover to remain above 40%, the minimum threshold for dispersal habitat."

* By using average canopy cover, some stands could be logged to below 40% canopy cover. The Forest Service should provide actual current and expected canopy cover percentages for stands instead of averages to avoid this potential.

* The Forest Service claims that all commercial and non-commercial logging will be in stands that are less than 80 years old. ³² However, the proposed amendment to the Northwest Forest Plan, if approved in its current form,

would increase the current 80- year-age threshold in late-successional reserves (LSRs) to 120 years-old

- * The Forest Service should disclose whether it intends to keep the 80-year limit in this Project for LSRs 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

- * The Forest Service claims that "the proposed variable density thinning is expected to redirect the developmental trajectory of the treated stands to increase forest diversity and structure throughout the project area. Within the LSR, the residual stand density is expected to allow individual trees to better develop structural characteristics associated with late successional habitat such as big stems, crowns, and branches as well as multiple tree layers."

- * The Forest Service should explain in greater detail how variable density thinning (VDT) would be applied in both Matrix and LSR stands. Under the NWPF, Matrix and LSRs have very different objectives. For example, Matrix is where "most timber harvest and other silvicultural activities occur to produce an optimum and sustainable yield of timber."³⁴ In LSRs, however, timber production is not the primary objective; rather it is to "protect and enhance conditions of latesuccessional and old-growth forest ecosystems" and any silvicultural activities are supposed to "promote and maintain late successional forest conditions."³⁵ Thus, VDT should look different depending on whether it is proposed in Matrix or LSR stands. The Draft EA, however, does not provide enough information to determine this.

Restocking

- * NFMA requires that lands are restocked within 5 years after logging. This requirement is incorporated in the forest plan for the Willamette National Forest.

- * The Draft EA does not provide any information on this requirement. Guardians reviewed various monitoring reports available on the Willamette National Forest's website to see if the Forest Service has been meeting this NFMA requirement over time. However, the latest monitoring report is nearly a decade old and provides no information on restocking.³⁸ Neither do any of the other monitoring reports going back to the late 1990s. The Forest Service needs to disclose whether it has been monitoring this NFMA and forest plan requirement and, if so, what the results of that monitoring show. This is especially important considering the staffing challenges at the Forest Service.

Post-thinning fuels treatments

- * The Forest Service acknowledges that "increased surface fuel loads" caused by the kind of logging proposed "elevate some metrics of fire behavior in the short-term"⁴⁰ The Forest Service also acknowledges that "more open stands allow for higher surface wind speeds and increased drying of surface fuels, increasing some metrics of fire behavior such as rate of spread."⁴¹ Nevertheless, the Forest Service claims that after the proposed logging, the agency would "treat surface fuels within all of the treatment units, largely mitigating this trend."

- * As discussed above regarding restocking, how does the Forest Service plan to monitor post-logging fuel loads to ensure that elevated fire risks are, in fact mitigated?

- * 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."⁴³ 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.

Roads

* The Forest Service claims that temporary roads that are constructed to facilitate logging "would be rehabilitated."

* It appears that the last public reporting of monitoring data on temporary roads is a decade old.⁴⁵ The Forest Service needs to provide updated monitoring data that demonstrates the Forest Service has, in fact, closed and rehabilitated temporary roads following implementation of past projects and the effectiveness of those rehabilitation efforts over the past decade.

* The Forest Service should also provide a timeframe for closure and rehabilitation of temporary roads.

* The Forest Service proposes 7 miles for road decommissioning.

* 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 Draft EA does not contain any information regarding how many stands were examined within the Project area. The Forest Service should disclose how many stands there are in the Project area, how many stands were examined, and what the results of those stand exams are.

Invasive Species

* The Forest Service has repeatedly acknowledged that "[i]nvasion of nonnative species [hellip] is one of the most important issues in natural resource management today," and there is broad scientific consensus that the activities contemplated by the proposed action can significantly worsen the issue. Indeed, the Forest Service admits that "both temporary and long-term soil disturbances" proposed in the Project "would spread invasive plants." The Forest Service further admits that if invasive species treatments are applied post-implementation, the risk of spread is "moderate" but without implementation of those treatments, the risk of spread "would be high." However, many of the invasive species treatments are optional and, even if the Forest Service sought to enforce them, it is unclear whether the agency has the capacity to do that.

* PDF-BOT 1 requires the cleaning of logging equipment to prevent the spread of invasive species.

* How does the Forest Service plan to monitor project implementation to ensure that "all equipment" is properly cleaned as this PDF requires?

* PDF-BOT 4 recommends that the edge of gaps be located "at least 100 feet from system roads and at least 50 feet from areas that have or are adjacent to non-native invasive plants."

* The Forest Service should make this mandatory or, at the very least, reduce the size of gaps so that the above distances are met

* PDF-BOT 5 recommends surveying and treating high priority non-native invasive plants after completion of ground disturbing activities.

* The Forest Service should make this mandatory (i.e., change "would" to "shall") and explain how it will ensure this PDF is implemented.

* PDF-BOT 6 recommends pretreatment of high priority weed sites in and adjacent to logging stands and associated roads and haul routes.

* The Forest Service should make this mandatory and explain how it will ensure this PDF is implemented.

* PDF-BOT 7 recommends that closed or decommissioned roads are treated for non-native invasive plants.

* The Forest Service should make this mandatory and explain how it will ensure this PDF is implemented.

* PDF-BOT 8 recommends that fuels treatments avoid burning and piling on existing high priority non-native

invasive plant infestation.

- * The Forest Service should make this mandatory and explain how it will ensure this PDF is implemented
- * PDF-BOT 13 states that "log source and storage sites will be surveyed and treated for invasive plants if possible."

- * The Forest Service should make this mandatory (i.e., delete "if possible") and explain how it will ensure enforcement.

Wildlife

- * The Forest Service states that the proposed action is likely to adversely affect Northern Spotted Owl and designated critical habitat within the project area.⁵⁸ However, a few pages later, the Forest Service states that the proposed logging activities "may affect but are not likely to adversely affect" Northern Spotted Owl or its critical habitat.

- * Obviously, both of these determinations cannot be true. The Forest Service needs to disclose which determination it made and how it is engaging with the U.S. Fish and Wildlife Service

- * The Forest Service states that "treatments in NSO critical habitat would modify and maintain dispersal habitat" and that logged stands "might take longer to reach the canopy cover requirements for suitable habitat."⁶⁰ However, the Forest Service claims that "overall effects to critical habitat are expected to be beneficial" because of "other characteristics" that will purportedly be maintained, "such as larger trees, a midstory, and more diverse species."

- * The Forest Service needs to provide a comparative analysis for its claim that the purported retention of larger trees, a midstory, and more diverse species outweigh the potential negative consequences of the loss of suitable habitat resulting from the proposed logging

Carbon Stocks

- * According to the Forest Service, the Willamette National Forest "sequesters more carbon than most National Forests." As such, the Forest Service must ensure that the Willamette National Forest continues to sequester as much carbon as possible to offset the effects of climate change

- * The Draft EA does not adequately consider the additive effects of the proposed logging and post-implementation fire on carbon stocks. For example, the Forest Service states that while the no action alternative "would not alter the current carbon stocks," it goes on to state the "other disturbances, namely fire, may affect forest carbon stocks if they were to occur."⁶³ However, the Forest Service does not analyze the potential effects on carbon stocks if the proposed logging occurs and fire impacts the area afterwards. This is a reasonably foreseeable occurrence since elsewhere in the Draft EA, the Forest Service acknowledges that the proposed logging will result in "more open stands [that] allow for higher surface wind speeds and increased drying of surface fuels, increasing some metrics of fire behavior such as rate of spread."

Cumulative Effects

- * The Forest Service claims that there will be no significant cumulative effects from sedimentation caused by this Project and other past, present, and reasonably foreseeable projects due to implementation of PDFs and BMPs.

- * The Forest Service needs to consider whether there would be significant cumulative effects from sedimentation if the proposed PDFs and BMPs are not implemented, particularly in light of the current staffing challenges.

- * The Forest Service also needs to analyze potentially significant cumulative effects for other resource areas.

Pertinent Executive Orders

* The Forest Service identifies various "pertinent" executive orders that provide support for the Project."

* 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 Willamette National Forest staff have been directed to expedite NEPA review for this and other Projects in response to the promulgation of this executive order.

Comment Period for the Draft EA

Finally, Guardians wants to notify the Forest Service that these comments are timely. In the April 28th notice letter announcing the comment period on the Draft EA, the Forest Service stated that it would accept comments for "30 days following publication of the comment period legal notice in The Register-Guard."⁶⁸ The legal notice was published in The Register Guard on April 28, 2025, which places the comment deadline on May 28, 2025.⁶⁹ However, the Forest Service removed the public comment portal⁷⁰ on May 28, 2025, indicating that the Forest Service improperly calculated the comment deadline earlier than the legally required 30 days.⁷¹ Thus, these comments are timely even though the Forest Service removed the public comment portal prior to the end of the comment deadline.

Thank you for the opportunity to comment.