

**Southern Environmental Law Center | Center for Biological Diversity | American Whitewater | Carson Forest Watch | Chattooga Conservancy | Conservation Congress | Earthjustice | Environmental Protection Information Center | Flathead Lolo Bitterroot Citizen Task Force | Friends of the Bitterroot | Kentucky Heartwood | Kettle Range Conservation Group | Klamath Forest Alliance | KS Wild | The Lands Council | Los Padres Forest Watch | MountainTrue | Natural Resources Defense Council | North Cascades Conservation Council | The Ohio Environmental Council | Oregon Wild | Sequoia ForestKeeper | Sierra Club | WildEarth Guardians | Winter Wildlands Alliance | Yellowstone to Uintas Connection**

February 19, 2021

Kevin Shea, Acting Secretary  
U.S. Department of Agriculture  
1400 Independence Ave. SW  
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[kevin.a.shea@usda.gov](mailto:kevin.a.shea@usda.gov)

*By email*

**Re: Forest Service Decisions Finalized Between January 20, 2017, and January 20, 2021 for Review Under Executive Order 13990.**

Dear Acting Secretary Shea,

We write in order to identify decisions of the United States Forest Service (USFS) that should be reviewed and either modified or withdrawn pursuant to Executive Order (EO) 13990. Many of the undersigned recently asked you to elevate review of *imminent* decisions,<sup>1</sup> an urgently needed process which, as we noted, is complementary to the separate duty required under EO 13990 to review *final* decisions made during the last four years. To that end, this letter identifies final decisions that are inconsistent with the Biden administration's important objectives.

EO 13990, issued on the first day of the Biden administration, directed all federal agencies

to immediately review and, as appropriate and consistent with applicable law, take action to address the promulgation of Federal regulations and other actions during the last 4 years that conflict with [the Biden administration's] important national objectives. . . .

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<sup>1</sup> Letter from Western Environmental Law Center, et al. to Kevin Shea, Acting Secretary (Jan. 28, 2021).

86 Fed. Reg. 7037, Sec. 1. Those “important national objectives” include the use of the best scientific information, processes that ensure the integrity of federal decision-making, environmental justice, reducing carbon emissions and bolstering resilience to climate change, and restoring protections for our national treasures on public lands. *Id.* We heartily support these objectives.

Many of the Forest Service’s policy, plan, and project-level decisions<sup>2</sup> finalized in the last four years served the goals of timber production, fossil fuel development, and mineral extraction at the expense of the objectives now prioritized by the Biden administration. It was widely known that line officers were pressured to meet volume targets.<sup>3</sup> As a result, the Forest Service has made decisions that:

- Do not reflect the best available science, but instead show political favoritism and prioritize extractive goals over ecological needs and risks, often characterizing controversial and harmful projects as needed for restoration or resilience and undermining public trust in the agency’s commitment to ecologically appropriate work.
- Systematically undermine the processes that ensure the integrity of federal decision-making, including “condition-based” decisions that bypass site-specific analysis and public input, abuse of existing categorical exclusions, and development of new overly-broad categorical exclusions for actions that, without NEPA analysis, may individually and cumulatively undermine ecological and climate-related goals.
- Facilitate last-minute giveaways to industry by making decisions at the political level and bypassing the objection process.
- Show a disregard for the input and values of Indigenous peoples.
- Unnecessarily decrease the potential for carbon storage on the national forests by targeting mature and old-growth forests, undermining the United States’ ability to reduce its net emissions and its credibility to promote forest protection internationally.
- Decrease resilience to climate change by expanding a bloated road system that degrades connectivity in terrestrial and aquatic ecosystems and, because of inadequate maintenance and increasing storm severity, is vulnerable to failures that cause resource damage.

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<sup>2</sup> While the EO specifically requires agencies to review regulations and policy-level decisions, it also extends broadly to other agency actions that conflict with or undermine the identified priorities, *id.* §§ 1, 2, including project-level decisions, *e.g.*, *id.* § 6.

<sup>3</sup> See [Memorandum](#) from Secretary Perdue to Regional Foresters (Aug. 10, 2020) (seeking timelines and milestones for increasing productivity).

- Degrade our nation’s natural treasures in Wilderness areas, Inventoried Roadless Areas (IRAs), and similar areas that have high biodiversity, connectivity, and potential for carbon storage.

Specific decisions of which we request review are described briefly in an attachment to this letter. These decisions should be reconsidered by the Secretary or Under Secretary for Natural Resources and Environment because they conflict with the objectives of President Biden’s administration. During the review process, the Department should instruct the Forest Service to refrain from entering into contracts, offering sales for bid, or otherwise making irreversible and irretrievable commitments of resources.

We recognize that realigning projects to current administration priorities could affect individual units’ programs of work. At this critical moment, however, the Forest Service must not simply reflexively push ahead with the projects already in the timber sale pipeline and then try harder to get it right next time. Such an approach would lead to an unconscionable delay in the steps needed to meet the challenges of the climate and biodiversity crises. The projects developed in recent years will determine the Forest Service’s impacts to carbon stocks, old growth and mature trees, and rare species and connected habitats for decades to come.<sup>4</sup>

Accordingly, the Forest Service must review its upcoming projects and change course. This obligation extends not only to the finalized decisions below, but more broadly to projects at all decision gates. Along these lines, we appreciate the Department’s prompt response to our January 28 letter, which directs that some imminent decisions—those that would harm roadless areas and expand fossil fuel development, for example—receive another look and, we trust, remedial action to address any conflicts with President Biden’s priorities.<sup>5</sup> We want to be sure that the review of imminent decisions also addresses two other critical problems we identified—namely, the use of condition-based management that removes consequential site-specific decisions from the transparent, rigorous NEPA process<sup>6</sup> and the liquidation of old-growth and mature forests. Further, we are concerned that nearly-final projects will escape needed review merely because they are scheduled for finalization after March 31, 2021. A broader review of both recent and upcoming decisions and trends is essential to understand where and how the agency has gotten off track.

Moving forward, we urge the Forest Service to reallocate agency resources from timber production to genuine ecological restoration. There is plenty of ecologically appropriate work to do, and line officers should be assured that anticipated funding will remain available to advance broadly supported work that is consistent with this administration’s important objectives.

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<sup>4</sup> Mature and old forests must be protected if this administration is serious about its commitment to reduce federal net carbon emissions, especially in the near term when carbon storage matters most. *See, e.g.*, William Moomaw, et al., “Intact Forests in the United States: Proforestation Mitigates Climate Change and Serves the Greatest Good,” *Frontiers in Forests and Global Change* (June 11, 2019) (available at <https://doi.org/10.3389/ffgc.2019.00027>).

<sup>5</sup> Memorandum to Victoria Christiansen, USFS Chief, from Chris French, Acting Deputy Under Secretary (Feb. 1, 2021) (ordering a review of certain decisions expected on or before March 31, 2021).

<sup>6</sup> Condition-based management was found to violate the National Environmental Policy Act in *Southeast Alaska Conservation Council et al., v. United States Forest Service*. Case No. 1:19-cv-00006-SLG.

Thank you for your consideration. We would like to meet with you at your earliest convenience to discuss these projects and how they exemplify broader, problematic trends that require your prompt attention.

Please note that not all of the undersigned have direct knowledge of each of the listed projects; please contact Sam Evans or Randi Spivak for further information or to determine the lead organization(s) on each project. We look forward to working with you during this transition and in the coming years to ensure that Forest Service actions are consistent with the Biden administration's goals.

Sincerely,

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## Appendix: Decisions for Review under EO 13990<sup>7,8</sup>

### I. Policy-level decisions

- a. The [Alaska Roadless Rulemaking](#), finalized October 29, 2020, was among the initial actions identified for review in the Fact Sheet that accompanied EO 13990.
- b. Trump-era Executive Order 13855, the Secretary's June 12, 2020 memorandum, and related Forest Service's timber targets, as memorialized in the [USDA Strategic Plan \(FY 2018 – FY 2022\)](#), should be immediately revoked. The policies directed an unsustainable increase in logging of 72%, from 2.9 billion board feet in 2017 to 5 billion board feet in 2022. The projects listed below have been unduly influenced by such misguided policies. This emphasis on increased volume, along with NEPA shortcuts, has produced irresponsible and unnecessarily harmful projects, with risks swept under the rug. Consistent with the objectives identified in EO 13990, the Forest Service must immediately eliminate targets based on volume outputs and instead measure its performance based on the outcomes needed to address the climate and biodiversity crisis: carbon storage, plant and wildlife diversity, habitat connectivity, and ecological function.
- c. The Forest Service's [NEPA rulemaking](#), finalized November 19, 2020, creates new categorical exclusions covering projects that, without NEPA analysis, informed public input, and consideration of alternatives, are likely to undermine a number of the Biden administration's goals. They allow, among other things, the unconsidered logging of some of the country's most valuable carbon storage banks and fragmentation of habitat connectivity needed for climate resilience. The rule also undermines the role of science in decision-making and diminishes the voice of stakeholders who lack the resources to influence decisions through collaborative processes. The rule should be rescinded by rulemaking and, in the meantime, line officers should be instructed not to use the new authorities.
- d. The Departmental Position that the agency will testify in favor of new Wild and Scenic Rivers only if it has previously found them "suitable" and new Wilderness Areas only if it has previously recommended them must be changed. Suitability determinations and Wilderness recommendations are made in forest plans, which take years to revise, last for decades, and are often influenced by political considerations that may no longer apply. The public's interest in protecting our national treasures should not be held hostage to these often-outdated decisions when areas are deserving of these designations. The Agency should take a fresh,

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<sup>7</sup> Several of the listed decisions are currently in litigation, including by several of the undersigned. The undersigned do not, by identifying such decisions for review, express any view regarding the conduct of ongoing litigation, but instead exercise their right to petition the Department for redress of grievances regarding the underlying decisions.

<sup>8</sup> The appearance of a signature on this letter does not state or imply the existence of a lawyer-client or other agency relationship between any of the undersigned. However, one or more of the undersigned may be representing parties adverse to the government with respect to listed decisions.

open-minded, and fact-based look at bills when crafting testimony based on their knowledge of the landscapes, not outdated and often-inaccurate political snapshots.

## II. Forest Plans

- a. The Chugach National Forest [Land Management Plan](#), finalized April 16, 2020, eliminated the requirement to maintain Wilderness character in the Nellie Juan-College Fjord Wilderness Study Area in the western Prince William Sound and as a result fails to protect this national treasure. In addition, the decision did not address concerns of the Chenega Corporation or the general public regarding lands within the WSA boundaries that were acquired from the Corporation after the Exxon Valdez oil spill (EVOS lands). EVOS lands were transferred to the Forest Service with the understanding that they would be managed to restore and protect subsistence resources and Wilderness values. This decision should be modified to restore the protections offered by the prior forest plan and more thoroughly describe management for EVOS lands.

## III. Project-level decisions

### a. *Northern Region*

1. The [Rock Creek Mine](#) project, on the Kootenai National Forest, was finalized in August 2018. The Record of Decision authorized the first phase of a major copper and silver mine beneath and adjacent to the Cabinet Mountains Wilderness, within the aboriginal territory of the Ktunaxa (Kootenai) Nation, and in irreplaceable habitat for threatened grizzly bears and bull trout. Partway through a legal challenge to the ROD and associated BiOps brought by Ktunaxa traditional cultural leaders and conservation groups, the Forest Service and FWS hastily scrapped all ESA analysis of the project's later phases (construction, operation, and reclamation), to push through a segmented approval of the initial phase. The agencies have also refused to consider data showing specific science-based measures needed to address existential mortality threats to the Cabinet-Yaak grizzly population. To meet its commitment to respond to the concerns of Native American communities and to protect our national treasures, the administration should withdraw the ROD and reinitiate consultation.
2. The [Soldier-Butler](#) project on the Lolo National Forest, was finalized by the Forest Service on April 17, 2020, and received a FWS revised consultation and biological opinion on October 2, 2020, authorizing ground disturbing activities (beginning June 2021) and production of 17.5 million board feet on 10,000 acres and 16 miles of new road construction, in areas where \$5 million of private and county funds have been invested restoring watersheds damaged by erosion from past mining and logging. The project is within the federally designated Ninemile Demographic Connectivity Area for grizzly bears. By increasing miles of roads this project will fragment habitat connectivity that multiple species, including

grizzly bears, need to maintain genetic diversity, avoid human encounters and find suitable habitats in the face of climate change. It also threatens regional recovery of grizzly bears by blocking movements between the Northern Continental Divide and Bitterroot Grizzly Bear Recovery Areas. The decision should be rescinded and the actions in the project should not go forward.

3. The [Piquett Creek](#) project on the Bitterroot National Forest is a condition-based CE authorizing 3,000 acres of logging anywhere within a 5,800-acre project area. Old growth stands will be commercially logged to retain only fifteen trees per acre. This project borders the contemporaneous Mud Creek project, which also uses a condition-based approach and will amend the forest plan to allow even heavier logging of old growth. Despite the cumulative effects of these two projects and the utter lack of site-specific analysis to support them, the agency concluded there was “no uncertainty” regarding whether the project would harm species like bull trout. The project should be withdrawn and re-initiated with appropriate public input on site-specific choices and analysis of cumulative impacts. Old growth forests must be preserved as carbon stores, and large, mature trees should be retained to restore the extent of old growth that has been systematically liquidated by the Forest Service.

*b. Rocky Mountain Region*

1. The Medicine Bow National Forest’s [Landscape Vegetation Analysis \(LaVA\)](#) project, finalized Aug. 13, 2020, used a condition-based approach to avoid transparent analysis and public input on the future site-specific decisions that will, together, determine how harmful the project will be. The approach prioritizes timber production goals over ecological needs and greenwashes the project as restoration. It authorizes up to a shocking 288,000 acres of “vegetation management” and 600 miles of temporary roads on top of an existing road system that the agency already cannot afford to maintain as storm severity increases. This project should be withdrawn. If re-noticed, it cannot proceed without site-specific analysis either in an SEIS or future tiered NEPA decisions.

*c. Southwestern Region*

1. The Coronado National Forest [approved Rosemont Copper's proposal](#) to dump 1.9 billion tons of mine waste and tailings on Forest Service land, despite the fact that it that did not contain a valuable mineral deposit as required by the General Mining Law of 1872. The site is sacred to tribes throughout Arizona and contains numerous ancestral graves, sacred springs and streams, archaeological sites (including remnants of a village site and rare ball court), and animals like the jaguar that are sacred to the tribes. The EIS acknowledged that the impacts to the tribes would “destroy [the tribes'] historical and cultural foundation, and diminish tribal members' sense of orientation in the world.” The impacts would be

"severe, irreversible, and irretrievable." The decision conflicts with the Biden administration's emphasis on respecting and including tribal interests and partnerships in public lands decision making, and in ensuring that mining operations comply with the limits of the 1872 Mining Law and regulations and do not harm tribal and conservation interests. The decision should be rescinded and the Forest Service should commence a new NEPA process based on an accurate interpretation of the 1872 Mining Law, with appropriate alternatives.

2. The [Pueblo Ridge Restoration](#) project on the Carson National Forest, finalized Dec. 1, 2020, exemplifies the harm caused when the agency tries to use the wrong tool (commercial timber production) to meet restoration and wildfire mitigation needs. The project ignores best available science, misrepresents impacts, allows logging of old growth and on slopes up to 75%, and includes 43 miles of re-opened roads in an important corridor for wildlife connectivity in the Southern Rockies. The project should be withdrawn. If the agency wants to move forward with a community wildfire protection project, it should devote adequate resources to do it right, rather than letting commercial factors dictate design of a project that may actually increase the risk to nearby communities.

*d. Intermountain Region*

1. On January 15, 2021, after refusing to allow public comment so that it could be finalized just days before the inauguration, the Forest Service entered into a [settlement agreement](#) with Midas Gold, ignoring strong opposition from the Nez Perce Tribe, conservation, and recreation groups, with the intent of creating a "glide path" for construction of an open-pit gold mine in the headwaters of the Salmon River. The removal actions outlined in the ASAOC are entirely inadequate, and reducing the financial assurance was not supported by appropriate data or analysis. The Forest Service and EPA have inappropriately intertwined removal actions with Midas Gold's plans for a new, vastly larger, and unpermitted mining activities at the site. The ASAOC should be rescinded, and the agencies should initiate a comprehensive cleanup plan for the Stibnite Mining District legacy pollution, subject to public review.
2. The [East Smoky Panel Mine](#) project on the Caribou-Targhee National Forest, finalized July 27, 2020, will cause the permanent loss of productive topsoil and degrade habitat connectivity for lynx and other species in an important wildlife corridor. These impacts to habitat connectivity would be cumulative not only with prior logging, mining, roads, and associated illegal OHV use, but also with other contemporaneous Forest Service projects in the vicinity. The wildlife corridor between Yellowstone and the Uintas is critical for ungulates and carnivores and will only become more important as the climate changes. The Forest Service should be looking for opportunities to restore

connectivity, not further degrade it. This decision should be revisited to analyze and fully mitigate the project's impacts.

3. The [Middle Henrys Aspen Enhancement](#) project, also on the Caribou-Targhee National Forest, was finalized by CE on July 9, 2020. Using a CE, the project authorized nearly 9,000 acres of commercial logging. Along with other projects in the vicinity, this project would degrade connectivity in a regionally significant wildlife corridor and negatively impact lynx, grizzly, wolverine, and white bark pine. The project should be withdrawn.
4. The [Crow Creek Pipeline](#), also on the Caribou-Targhee National Forest, was finalized on Nov. 1, 2019. The natural gas pipeline would involve an 18-mile linear right-of-way through five IRAs, also crossing the Oregon National Historic Trail and California Historic Trail, in habitat for sage grouse and other species. In addition to degrading connectivity, the project would be a vector for illegal motorized use and noxious weeds. The ROD should be rescinded and the special use permit denied.

*e. Pacific Southwest Region*

1. The [Cuddy Valley Forest Health / Fuel Reduction](#) project on Los Padres National Forest, finalized Nov. 13, 2018, adjacent to the Tecuya Ridge project (see below), was the first commercial timber sale on Los Padres in decades. The project improperly relied on CE 6, despite its controversial, precedential, and cumulative impacts to wildlife and scenic resources. The decision does not include a diameter limit, allowing liquidation of the most resilient trees for commercial purposes. The project is inconsistent with the forest plan and with local stakeholders' Community Wildfire Protection Plan, and it would actually increase fire risk to local communities. The decision should be rescinded.
2. The [Tecuya Ridge Shaded Fuelbreak](#) project on Los Padres National Forest, finalized April 9, 2019, improperly relied on CE 6 to authorize ground-disturbing timber production, including logging within an IRA. The project's effects are cumulative with the adjacent Cuddy Valley Forest Health / Fuel Reduction project (see above). It also flouts best available science by creating a fuel break too far from communities to be effective. The decision should be rescinded.
3. The Sequoia National Forest's Plateau Roads Hazard Tree project,<sup>9</sup> finalized June 6, 2020, used a CE to authorize 2,193 acres of commercial logging of large trees up to 200 feet from 45 miles of road, in habitat for the endangered Pacific fisher. Use of the CE precluded public input and consideration of alternatives, including the alternative of noncommercial felling of legitimate hazard trees. The Decision Memo should be

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<sup>9</sup> No Forest Service webpage is available for this project. Additional information available on request.

withdrawn. If the agency wants to move forward, it should start over with an EA and appropriate public input.

4. The [Eastside Restoration](#) project on the Shasta-Trinity National Forest is a 10-year, 13,575-acre project approved using “stacked” CEs on Dec. 14, 2020. This use of CEs undermined the integrity of the decisionmaking process, leading to uninformed conclusions that are not consistent with best available science and cursory dismissals of legitimate public concerns without any data or support to do so. The project also ignores the cumulative impact of continued logging in this already-heavily-logged area, including impacts water quality in the Porcupine Watershed.

*f. Pacific Northwest Region*

1. The Umpqua National Forest’s [Calf-Copeland Restoration](#) project, finalized on Sep. 15, 2020, and the Rogue River-Siskiyou National Forest’s [Shasta Agness Landscape Restoration](#) project, finalized on Dec. 28, 2020, each authorized between 1,700 and 1,800 acres of logging in late-successional reserves (LSR), violating the standards and guidelines for LSRs. Calf-Copeland includes nine miles of temporary road construction and would impact mature forests and connectivity in an uninventoried roadless area. Both projects should be modified so that unsold portions retain more trees and all large trees to mitigate impacts to carbon stocks and biodiversity.
2. The [Flat Country](#) project, on the Willamette National Forest, was finalized on the eve of the inauguration, Jan. 19, 2021. It authorized over 4,000 acres of logging, including heavy regeneration harvest, in stands up to 150 years old, with 10 miles of road construction. The project should be modified so that unsold portions retain more trees and all large trees to mitigate impacts to carbon stocks and biodiversity.
3. The [Sanpoil](#) project on the Colville National Forest, finalized Dec. 11, 2020, included logging within an IRA, logging of old-growth and mature forests, would degrade habitat connectivity, and would harm lynx. The [Trout Lake Insect and Disease](#) project, also on the Colville National Forest, was finalized June 3, 2019. Using a CE, the project authorizes nearly 3,000 acres of timber production immediately adjacent to and contemporaneous with other projects. Both projects would cumulatively impact habitat for wide-ranging species, fail to provide needed site-specificity for public review, and fail to incorporate the input of the collaborative NE Washington Forest Coalition. The projects would also impact scenic integrity for users of National Scenic and National Recreational Trails and a scenic byway. These projects are ill informed, and seek simply to increase “shelf stock.”
4. The [Upper Briggs Creek](#) project on the Rogue River-Siskiyou National Forest, finalized August 2019, will result in the “take” of northern spotted owls by removing the mature and old-growth habitat they depend on, and

will not implement the “survey and manage” program because the Forest will not survey for (or buffer habitat occupied by) red tree voles. The project should be withdrawn and modified to retain mature and old growth forests and avoid take.

5. The [S. F. Stillaguamish Vegetation Management](#) project on the Mt. Baker-Snoqualamie National Forest National Forest, with a Decision Notice signed May 31, 2019, includes 3,600 acres of commercial logging in mature forests and 60 miles of road construction and reconstruction in late-successional and riparian reserves, critical habitat for northern spotted owl and marbled murrelet, and allowing incidental take of those species as well as bull trout, Puget sound chinook, and steelhead. Commercial logging prescriptions will remove nearly 100 mmbf with heavy thinning and large openings. Although implementation has begun, much of the project is “on the shelf” for future timber sales. The remaining portions of the project should be cancelled.
6. On Jan. 12, 2021, the Under Secretary signed a [regional amendment](#) to the Eastside Screens, bypassing the objection period. The decision amended forest plans in six national forests, allowing removal of large trees (over 21” dbh) that provide old-growth values and carbon storage and sequestration across millions of acres of national forests in eastern Oregon and Washington. Given the problems with recent projects in the region, including some listed above, this decision creates a high potential for abuse, even if supported by good intentions. The decision was supported only by an environmental assessment, even though the new weaker guideline, which replaced a clear standard, would allow ecologically significant and controversial impacts.

*g. Southern Region*

1. The [Mountain Valley Pipeline and Equitrans Expansion](#) project on the Jefferson National Forest (VA) bypassed the objection process in order to issue a record of decision on January 11, 2021. The eleventh-hour approval of this pipeline and accompanying plan amendment waives numerous plan standards and would fragment habitat and lock in the continued development of climate-damaging fossil fuels despite a lack of future need. This decision should be rescinded.
2. The [South Red Bird Wildlife Enhancement](#) project on the Daniel Boone National Forest (KY) authorized heavy ground-disturbing logging on steep slopes and unstable soils, in an area with a recent history of Forest Service–caused landslides and sensitive aquatic species downstream. After working privately to design the project with a stewardship contractor (who was also a putative objector) prior to a pending objection meeting, the Forest Service finalized its decision on January 19, 2021, the eve of the inauguration. This decision should be withdrawn and audited to ensure the integrity and independence of the decisionmaking process.

3. The [Buck](#) and [Southside](#) projects on the Nantahala National Forest (NC) would log old-growth and mature forests and carbon sinks for commercial timber production, destroy habitat for rare species that are already threatened by climate change, destroy state-recognized rare and exemplary natural plant communities, and fragment areas identified as eligible for addition to the National Wilderness Preservation System. Both projects prejudice the ongoing forest planning process. These projects should be withdrawn and re-noticed without the controversial and harmful logging.
4. The [Union County Target Range](#) project on the Chattahoochee National Forest (GA) is an example of political favoritism trumping the best available science and protection of our national treasures. It would permit construction of a new shooting range for a private gun club on the boundary of designated Wilderness area and a mere three miles from an existing shooting range also located on national forest lands. In addition to creating noise that would be heard within two Wilderness areas and a Scenic Byway, the new range creates a safety hazard for Appalachian Trail users. The local deciding officer was instructed to approve the project as a political favor to an associate of Secretary Perdue, through channels that lacked the delegated authority to give such instructions. The project should be immediately cancelled and audited to document the highly inappropriate political influence that drove this project.

*h. Eastern Region*

1. The Twin Metals Mineral Lease Renewals on the Superior National Forest should be rescinded. The Forest Service [consented](#) to two federal mineral leases, despite the omission of stipulations needed to address impacts the agency had previously identified in 2016, reversing course because of politics, contrary to law and best available science. The mine would be located on Ceded Territory and the Minnesota Chippewa Tribe opposes copper mining in this area. The Boundary Waters - the heart of the Quetico-Superior region - is a vitally important regional and national treasure. It is the most visited wilderness area in the United States. It is the largest wilderness area east of the Rocky Mountains and north of the Everglades. Sacrificing this unique and vital region to sulfide-ore copper mining would destroy not only an irreplaceable recreational and economic treasure, but what is also one of our best natural assets in the fight against climate change. The affected area's boreal forests store more carbon than any other terrestrial ecosystem - almost twice as much per acre as tropical forests, whereas the mine is estimated to emit 23,444,730 tons of CO<sub>2</sub> over its 20-year lifetime.
2. [The Sunny Oaks Project](#) on the Wayne National Forest, finalized Nov. 19, 2020, casts aside the agency's best available science regarding oak regeneration and instead focuses on timber production in stands that are decades away from being suitable for oak regeneration. Further the project

uses a condition-based approach to obscure this information from the public. It would degrade remnant oak-dominated landscapes, and it failed to consider and disclose ecological and climate impacts. All told, the project would include about 2,500 acres of clear cuts, 10 miles of new permanent roads, 17 miles of reconstructed roads, and 820 miles of fire lines (of which 460 would be dozer lines). This decision should be rescinded.

*i. Alaska*

1. The [Moderate Vulnerability Karst Forest Plan Amendment](#) for the Tongass National Forest, signed August 13, 2020, used a categorical exclusion to remove limits on clearcutting in areas with karst terrain. Use of a CE undermined the integrity of the decisionmaking process. Because most of the previous logging on karst lands on the Tongass occurred long before standards were in existence, the agency has no baseline data on what impacts occurred and exist in these areas currently, and therefore no understanding of how repeated entries into these areas will exacerbate the damage to these fragile systems, their hydrologic function, soils and the species that depend on karst hydrologic systems. The change undermines carbon storage on federal lands by failing to evaluate not only the loss of sequestered carbon through logging these areas, but also how carbon is stored in karst and may be impacted through disturbance from logging and roadbuilding activities. The decision should be withdrawn and an EIS is needed to fully consider the impacts and compare alternatives.