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July 15, 2021

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RE: Impacts of Forest Service NEPA Rulemaking on Climate Change and Federally-Listed Species

On November 19, 2020, the U.S. Forest Service finalized a rulemaking under the National Environmental Policy Act (“NEPA”), 85 Fed. Reg. 73,620 (Nov. 19, 2020) (“the Rule”), which amends the agency’s NEPA regulations to establish new and revised Categorical Exclusions (“CEs”). Those CEs will allow the Forest Service to undertake, without further NEPA analysis in an Environmental Assessment (“EA”) or Environmental Impact Statement, site-specific actions across the entire 193 million-acre National Forest System that are likely to affect listed species and their critical habitats. Among other things, these actions cover up to 2,800 acres of commercial timber harvest with up to three miles of logging road construction, up to 2 miles of permanent

road construction for any reason, and “special uses” (such as utility rights-of-way or quarries) affecting up to 20 acres of National Forest lands. The undersigned organizations write to express our concern that this Rule will harm vulnerable species and habitats protected under the Endangered Species Act and National Forest Management Act and worsen the magnitude and impact of climate change.

This administration has made its priorities to address the climate and biodiversity crises clear. *See* Exec. Order No. 13,990, 86 Fed. Reg. 7,037 (Jan. 20, 2021); Exec. Order No. 14,008, 86 Fed. Reg. 7,619 (Jan. 27, 2021). In addition to the numerous legal deficiencies with the content of and process underlying the Rule already being challenged,¹ this regulation threatens to undermine these key priorities in significant ways that were never considered by the Forest Service, the Fish and Wildlife Service (“FWS”), and the National Marine Fisheries Service (“NMFS”) before its finalization.

In light of President Biden’s instruction to “immediately review all existing regulations ... promulgated, issued, or adopted between January 20, 2017, and January 20, 2021, that are or may be inconsistent with, or present obstacles to,” addressing the climate and biodiversity crises, or which may not be “guided by the best science” or protect “processes that ensure the integrity of Federal decision-making,” 86 Fed. Reg. at 7,037, the Rule should be reconsidered at once. The Forest Service should take no action under the new authorities promulgated in the Rule until its negative effects on climate change and biodiversity are analyzed and addressed.

Failure to Analyze Climate Change Impacts

The Rule is explicitly intended to increase the pace and scale of covered actions, including timber harvests, by spending less time on analysis and associated public input. 84 Fed. Reg. 27,544, 27,550 (June 13, 2019); 85 Fed. Reg. 73,620, 73,629 (Nov. 19, 2019). Despite this purpose, the Rule contains no analysis of whether such an increase will contribute to climate change, much less how significant that contribution may be.

National Forests store a significant amount of carbon, particularly in older forests, and have enormous potential to store additional carbon where left to age.² This existing and potential carbon storage is lost during timber harvest, with only a fraction stored (and only temporarily) in wood products. Nationally, carbon losses from timber harvests are five times higher than those from all other disturbances combined, including wildfire.³ Similarly, on southern national forests, timber harvests are the primary disturbance influencing carbon stocks.⁴

¹ *See* The Clinch Coalition v. U.S. Forest Service, No. 2:21-cv-00003-JPJ-PMS (W.D. Va. filed Jan. 8, 2021).

² *See, e.g.,* USDA Forest Service. *Baseline Estimates of Carbon Stocks in Forests and Harvested Wood Products for National Forest System Units; Southern Region* (2015), <https://www.fs.fed.us/climatechange/documents/SouthernRegionCarbonAssessment.pdf>. Carbon stock figures in this report are likely an underestimate due to recent changes in how carbon stored in soils is calculated.

³ N.L. Harris, et al., *Attribution of net carbon change by disturbance type across forest lands of the conterminous United States*, *Carbon Balance Manage* 11, 24 (2016), <https://cbmjournals.biomedcentral.com/articles/10.1186/s13021-016-0066-5>.

⁴ Richard Birdsey, et al., *Assessment of the influence of disturbance, management activities, and environmental factors on carbon stocks of U.S. national forests*. Gen. Tech. Rep. RMRS-GTR-402 (2019). Fort Collins, CO: U.S.

More importantly, carbon stocks are determined by the cumulative effect of many individual project-level decisions, and those projects' effects vary considerably depending on site-specific choices for the location and type of treatment. The Forest Service makes these kinds of choices again and again at the project level, and it is only because of the NEPA process that the agency is required to consider alternative types of treatment or locations for harvest.

The Rule takes away that backstop. It allows up to 2,800 acres of timber harvest without any requirement to consider alternatives or analyze impacts (including cumulative impacts to carbon stocks). 36 C.F.R. § 220.6(e)(25). This loophole is large enough for some Forests' entire timber sale programs to pass through without analysis, such as relatively small eastern forests where projects rarely if ever exceed 2,800 acres.

By failing to analyze this issue at the programmatic level, the Forest Service turned a blind eye to possible limitations that could have ensured that covered harvests are located in places where they are least likely to result in depletion of carbon stocks. To be sure, the Rule requires that qualifying timber harvests be intended for the purpose of restoration, but that requirement does not restrict the unnecessary liquidation of carbon-rich forests, especially because the agency justifies many damaging commercial timber sales in the name of "restoration." Indeed, before the Rule was adopted, the agency already had authority to harvest up to 3,000 acres for hazardous fuels reduction purposes, subject to retention requirements for large and old-growth trees. 16 U.S.C. § 6591d. Consequently, the Rule's *new* authority is really only for logging in forests that are *not* at any particular risk of wildfire, and includes harvest of large and old-growth trees. Characterizing such harvests as "restoration" does not ensure that they will improve ecological integrity or resilience, especially when approved under a CE without analysis and informed input, and it certainly does not eliminate their cumulative effect on carbon stocks.

Other authorities in the Rule are also likely to adversely affect net federal emissions, such as allowing non-minor special uses, which may involve the use of fossil-fuel-powered heavy equipment on site for years, or pipeline rights-of-way that will lock in dependence on fossil fuels for decades. *See* 36 C.F.R. § 220.6(e)(3).

Without NEPA analysis—including public input and consideration of alternatives—the Forest Service will lose the only procedural safeguard by which site-specific decisions' contributions to climate change can be considered. This is not to say that the Forest Service always does a good job of considering project-level effects on carbon stocks,⁵ but the cumulative effect of site-specific choices must be considered *somewhere*. In reconsidering the Rule, the Forest Service should analyze its likely effects on carbon stocks and emissions at the programmatic level, in comparison to narrower authorities that would focus restoration activities in places where they will not unnecessarily deplete carbon stocks or on other non-silvicultural activities like prescribed burning.

Department of Agriculture, Forest Service, Rocky Mountain Research Station,
https://www.fs.fed.us/rm/pubs_series/rmrs/gtr/rmrs_gtr402.pdf.

⁵ *See, e.g.*, Pisgah-Nantahala National Forest, Buck Project Environmental Assessment (May 2020) at 116 (addressing climate change impacts only by stating they will be "extremely small"),
https://www.fs.usda.gov/nfs/11558/www/nepa/105221_FSPLT3_5298794.pdf.

If this administration is to live up to its commitment to address climate change, it cannot allow an unrestricted and entirely unanalyzed liquidation of carbon stocks from the nation's forests. Action under the Rule should be suspended until its effect on the climate change threat is addressed.

Failure to Analyze Species Impacts

In addition to the agency's failure to address the climate change impacts likely to arise from use of new CEs, the Rule also contains no information suggesting that the Forest Service has considered detrimental impacts to biodiversity that are likely to result from the Rule, which will authorize entire programs of work on National Forests without the public input that often brings species and habitat issues to the agency's attention. As far as we are aware, the Forest Service has made no analysis of impacts to vulnerable species, like designated Species of Conservation Concern ("SCC") and Regional Foresters' Sensitive Species ("RFSS"), and no effort to even informally consult with FWS and NMFS to determine the Rule's effects on federally-listed endangered and threatened species and their designated critical habitats. The Forest Service finalized the Rule without disclosing or even considering the cumulative, adverse environmental consequences on at-risk species or their habitats that will result from utilizing these CEs.

The Forest Service's administrative record for the rulemaking is replete with information about how the NEPA process—and particularly the EA process—is responsible for project changes that are needed to avoid or minimize harm to rare species and their habitats. The record shows instances in which transparent site-specific analyses and informed public input helped to identify populations of rare species within project areas that were otherwise unknown to the Forest Service, resulting in the dropping of risky stands, buffering of species occurrences, or modifying of projects in other ways.⁶ The record also shows the role of these procedural safeguards in reducing erosion and sedimentation caused by logging on steep slopes or erosive soils—improvements of critical importance to vulnerable aquatic species downstream.⁷ Further, the NEPA process results in project improvements that avoid fragmentation and maintain habitat connectivity, which contributes to the resilience of rare species in the face of climate change.⁸ The Forest Service's Rule removes these mandatory safeguards from projects that often threaten listed, candidate, and at-risk species, both individually and cumulatively. The types and degrees of such threats depend on where projects are located and what species are present, questions that will not be adequately answered without site-specific analysis and public input.

Notably, the Forest Service failed to undertake any kind of analysis to address the effects of the enormous information gap that will result from the Rule. Without this information, developed through the NEPA process, federally-listed and other at-risk species will be negatively impacted. The Rule establishes authority for potentially harmful actions on some of the most

⁶ See, e.g., Western Environmental Law Center, Southern Environmental Law Center, and The Wilderness Society, Comments on Proposed Rule, National Environmental Policy Act (NEPA) Compliance (84 Fed. Reg. 27,544, June 13, 2019), 35-37 (Aug. 25, 2019) ("ANPR Comments").

⁷ See, e.g., ANPR Comments at App'x 3, Table 7.

⁸ See, e.g., ANPR Comments at App'x 1, Table 8.S

important conservation areas in the country. Our National Forests provide a crucial biodiversity reservoir for hundreds of listed species, with millions of acres and miles of stream habitat on the Forests designated as critical habitat.⁹ Eliminating procedural safeguards that have proven critical to identifying, avoiding, and minimizing harms to vulnerable species clearly will impact these species in negative ways.

As far as we are aware, the Forest Service has not initiated any correspondence with NMFS or FWS regarding the impacts of the Rule on listed species or critical habitat, nor undertaken any of its own analysis of the impacts of the Rule on federally-listed species. The only references to the Endangered Species Act found in the Rule are promises that “the Agency will continue to comply with the requirements of all applicable laws and regulations, such as the . . . Endangered Species Act.” 85 Fed. Reg. at 73,621. Without transparent site-specific analysis and informed public input, however, the Forest Service will not have adequate information to know whether its proposed actions will impact listed species or their habitats. Elsewhere, the Forest Service states its future plans to form “National Historic Preservation Act and Endangered Species Act task forces to identify and implement efficiencies.” *Id.* at 73,622. These promises of future action do not alleviate concerns that species will face negative impacts at exactly the time when threats from climate change and increasing fragmentation from timber harvest and road-building exacerbate vulnerability to jeopardy.

Similarly, there has been no effort to address or analyze how SCC and RFSS, which gain a protected status under the National Forest Management Act, will be impacted. Of course, many of these at-risk species are declining and are especially vulnerable to the effects of climate change, and may for that reason require listing in coming years. To the extent that FWS and NMFS hope to conserve at-risk species and prevent the need for listing, the NEPA process (through public input informed by site-specific analysis and consideration of alternatives) is an essential safeguard. Relatedly, removal of this safeguard undermines prior decisions *not* to list vulnerable species as endangered or threatened. Often, the presence of species on federal lands has been cited as a reason that a population is secure. But without the site-specific process needed to ensure that such species are identified and protected, security is an illusion.

Though a site-specific action properly carried out under a CE is subject to Section 7 consultation requirements under the Endangered Species Act, the possibility of project-specific consultation at a future time does not reduce the threats to species we raise here. Significant information that leads to mitigation of impacts to vulnerable species is supplied by the public as part of the NEPA process. Additionally, site-specific consultation does not capture the aggregate impacts that the CE and DNA authorities promulgated under this Rule will have on vulnerable and federally-listed species and habitats. *See, e.g., Center for Nevada Conservation v. U.S. Forest Serv.*, 832 F. Supp. 2d. 1138, 1144 (E.D. Cal. 2011) (citing *Gifford Pinchot Task Force v. U.S.*

⁹ *See, e.g.,* Biological Assessment of the United States Department of Agriculture National Forest System Land Management Planning Rule for Federally Listed Endangered and Threatened Species, Species Proposed for Federal Listing, Species that are Candidates for Federal Listing on National Forest System Lands (Oct. 2011), at 14, https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5359453.pdf (“Currently, 430 species federally listed as threatened or endangered and six species proposed for federally listing are known to occur on NFS lands. . . . Currently, over 16 million acres of terrestrial habitat and 22,000 miles of stream habitat on NFS lands are designated as critical habitat for threatened and endangered species.”).

Fish and Wildlife Service, 378 F.3d 1059, 1062 (9th Cir. 2004), amended 387 F.3d 968 (9th Cir. 2004)).

The existence of “extraordinary circumstances” review as part of using a CE at the site-specific level also does not ensure that impacts to federally-listed and other at-risk species will be avoided. Under the regulations of both the Forest Service and the Council on Environmental Quality, the presence of a federally-listed species or designated critical habitat alone does not prevent a project from moving forward under a CE, which could result in cumulative impacts to these species and their habitats even where consultation on an individual project does not show significant harm. 36 C.F.R. § 220.6(b), 40 C.F.R § 1501.4(b)(1) (2020). Of equal importance, the site-specific NEPA process is often the reason the agency becomes aware of negative impacts in the first place. Such impacts will not disqualify a project from moving forward under a CE if they are not known.

The prior administration’s failure to analyze species impacts before finalizing the Rule improperly obscured the Rule’s overall effects, allowing the agency to consider only smaller actions that may not individually appear to harm listed species and their habitats simply because information that should have been developed in the NEPA process is lacking. The full effects of this large-scale effort to increase the pace and scale of logging while conducting less analysis have accordingly never been analyzed. *See, e.g., American Rivers v. U.S. Army Corps of Eng’rs*, 271 F.Supp.2d 230, 255 (D.D.C. 2003). This approach would facilitate the piecemeal destruction of species and their habitat that federal listing and National Forest Management Act requirements are meant to avoid. During reconsideration of the Rule, the Forest Service should consult with FWS and NMFS regarding the likelihood of adverse impacts to rare species.

Conclusion

The Rule undermines the Forest Service’s weighty responsibility to ensure that its actions contribute to carbon storage, promote resilience, and protect our remaining biodiversity. The agency should take no action pursuant to the Rule until it reconsiders the Rule in light of the impacts described above, using the best available scientific information and with additional opportunities for public involvement. Please do not hesitate to contact us if we can provide additional information or otherwise assist the agency in addressing our serious concerns with the Rule.



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