



May 22, 2025

Brian McNeil  
District Ranger  
Snoqualmie Ranger District  
902 SE North Bend Way Bldg. 1  
North Bend, WA 98045

**RE: Carbon River Landscape Analysis Project Draft Environmental Assessment #65083**

*Comments submitted electronically through the comment portal:* [US Forest Service NEPA Projects Home](#)

Dear District Ranger McNeil,

On behalf of The Mountaineers, we appreciate the opportunity to submit comments to the Mt. Baker-Snoqualmie National Forest regarding the content of the proposed Carbon River Landscape Analysis Environmental Assessment #65083. Our 16,000+ members regularly engage in outdoor recreation in the Carbon River Corridor and in other public lands throughout the Pacific Northwest.

The Mountaineers, based in Seattle, Washington and founded in 1906, is a nonprofit outdoor education, conservation, and recreation organization whose mission is “to enrich the community by helping people explore, conserve, learn about and enjoy the lands and waters of the Pacific Northwest and beyond.” The Mountaineers Books publishing division expands the mission internationally through award-winning publications including instructional guides, adventure narratives, and conservation photography. 1,200 skilled volunteers lead 3,200 outdoor education trips and courses annually for 16,000+ members. Our youth programs provide over 15,000 opportunities each year for children to get outside. We are a passionate, engaged, and knowledgeable community that cares about the outdoors, and protects the outdoor experience for current and future generations.

As you know, The Mountaineers owns the Irish Cabin Property, which is just outside the Carbon River Entrance to Mount Rainier National Park (MRNP). The property is occasionally used for course field trips and is available for use by individual members for primitive camping. In addition to our Irish Cabin Property, Mountaineers use the Carbon River Corridor to access nature viewing, hiking, backpacking, camping, trail running, scrambling, and mountaineering opportunities. We also value the Corridor for its natural conservation values, including the inland temperate rainforest ecosystem, habitat for wildlife and threatened species, and contribution to climate resiliency.



The Mountaineers reviewed the Carbon River Landscape Analysis Environmental Assessment and respectfully submits the following comments to express our support for certain elements, to articulate specific concerns, and to request clarification on key aspects of the proposed project. We are particularly interested in the impact of the Fairfax Bridge closure on recreation in the project area, and the preservation of Forest Service Road 78 to maintain future access. Please find our detailed comments on the EA below:

### **Fairfax Bridge Closure**

The Carbon River Landscape Analysis Draft Environmental Assessment acknowledges the recent closure of the Fairfax Bridge. However, the bridge closure is referenced just three times across the 89-page document, and only briefly within the Watershed Restoration and Transportation sections. There is no substantive discussion of the closure's broader implications for the project area or the Forest Service's capacity to implement key components of the proposed actions.

This limited discussion of the Fairfax Bridge closure and its impacts on the Carbon River Corridor is understandable, as the Draft EA was developed prior to the announcement of the bridge's closure on April 17, 2025, and the event itself was unforeseen. However, this structural closure has substantial implications not only for the feasibility of implementing various components of the proposed project but also for public access to key recreational areas within the Carbon River Corridor and Mount Rainier National Park.

The Fairfax Bridge served as the sole vehicular access point from State Route 165 to critical destinations such as Tolmie Peak, Mowich Lake, Spray Park, and Summit and Coplay Lakes. These sites are among the most popular and heavily visited areas within the region, drawing thousands of visitors each year. With the bridge now closed, this vital access has been effectively severed, drastically limiting the public's ability to recreate within this portion of the National Park and the adjacent National Forest lands.

We urge the Forest Service to address this issue directly in the final Environmental Assessment. Specifically, the document should include an evaluation of how the bridge closure affects the implementation of proposed management actions and recreational access within the analysis area. The closure represents a fundamental change in access and must be considered in the assessment of environmental impacts, visitor use patterns, and forest management strategies.

### **Partner Coordination and Visitation Management**

In the summer of 2024, Mount Rainier National Park implemented a pilot timed-entry reservation system. During that period, the Park directed visitors who arrived without reservations to alternative recreation opportunities, including those along the Carbon River Corridor. Although the 2025 timed-entry system will be more limited in scope - applying only to



the Sunrise Corridor - it is reasonable to anticipate continued or increased visitation to areas surrounding the park, such as National Forest lands.

The Fairfax Bridge closure, however, significantly limits access to much of the Carbon River Corridor, raising concerns about the displacement of visitors and the potential for resource impacts in other areas of the forest not currently managed for high-volume recreation. The lack of access also poses challenges for equitable public use, concentrating recreation pressure in already overburdened sites.

Given these dynamics, we respectfully request that the Snoqualmie Ranger District work proactively and collaboratively with Mount Rainier National Park to address these cross-jurisdictional challenges. A coordinated approach is essential to ensure that visitor management, ecological protection, and public access are addressed in a holistic manner. Additionally, we urge the Forest Service to engage directly with the Washington State Department of Transportation (WSDOT) as they evaluate options and determine next steps for the Fairfax Bridge.

### **Changes from Scoping**

The Mountaineers appreciate the effort the Forest Service has made to integrate public input from the scoping phase into the Carbon River Landscape Analysis Draft Environmental Assessment. However, we wish to express our disappointment that a number of important recreation-focused proposals identified during scoping were ultimately excluded from further analysis in the Draft EA. These proposed improvements, including facilities and infrastructure enhancements at several high-use and high-value recreation sites, represented meaningful opportunities to enhance visitor experiences and address long-standing access and resource management concerns.

Specifically, we note that the following projects were removed from consideration:

- Development of the Coplay Lake Campground and Nature Trail
- Construction of a parking lot and connector trail for the Summit Lake Trail
- Installation of a new toilet at the Summit Lake Trailhead
- Development of a new trailhead and parking area at Tolmie Falls
- A proposed ban on dispersed camping in the Carbon River floodplain

We understand the considerable resource constraints facing the agency. We also acknowledge that the unexpected closure of the Fairfax Bridge has complicated planning efforts by cutting off access to many of the areas where these projects would have been implemented. These are reasonable justifications for the current deferral of some of these proposals.

That said, we urge the Forest Service to address recreation more robustly in the final Environmental Assessment. Even if certain projects cannot be implemented at this time, the final



EA should outline a vision or framework for how and when these proposals might be reconsidered - either once access is restored or if funding becomes available.

### **Forest Service Road (FSR) 78**

The Mountaineers continue to support **Option 1** for the future of Forest Service Road (FSR) 78. Among the final alternatives presented in the Carbon River Landscape Analysis Draft Environmental Assessment, Option 1 - rerouting and maintaining the road - represents the only alternative that preserves long-term recreational access to a critical area of the Carbon River landscape.

FSR 78 (commonly known as the Carbon River Road) provides the sole viable access route to the Clearwater Wilderness and the northwest corner of Mount Rainier National Park, including popular recreation destinations such as Summit Lake and Coplay Lake. These destinations serve as important field classrooms for our members and partners, and they offer accessible opportunities for hiking, camping, and backpacking experiences.

While we understand that the recent and unanticipated closure of the Fairfax Bridge currently cuts off access to FSR 78, we nonetheless strongly encourage the Forest Service to pursue Option 1 as a proactive and forward-looking strategy. Infrastructure decisions made today will shape future recreation opportunities for decades. If and when the Fairfax Bridge is repaired or replaced - or if an alternative access route is established - maintaining FSR 78 in a usable condition will be critical to ensuring that this region remains accessible to the public.

We remain opposed to **Option 2**, which would decommission FSR 78 entirely. This approach would sever recreation access to the Clearwater Wilderness and eliminate a popular gateway to high-quality outdoor recreation experiences.

We respectfully urge the Forest Service to maintain its commitment to supporting sustainable recreation access in the Carbon River Corridor and to adopt **Option 1** for FSR 78 in the final Environmental Assessment. Preserving this route aligns with the agency's multiple-use mandate and responds to clear public demand for recreational infrastructure that connects people to their public lands.

### **Other Comments and Considerations**

#### **Tribal Engagement**

The Mountaineers are pleased to see that several of our recommendations from the scoping period have been acknowledged and incorporated into the Carbon River Landscape Analysis Draft Environmental Assessment. In particular, we commend the Forest Service for its continued engagement with the Tulalip Tribes and Muckleshoot Indian Tribe throughout the development of the Draft EA. As we emphasized in our



initial scoping comments, sustained and meaningful Tribal consultation is critical to ensuring that land management decisions honor treaty rights, cultural connections to the land, and the traditional ecological knowledge that Tribes contribute to stewardship of this landscape.

We encourage the Forest Service to maintain and deepen this engagement not only throughout the finalization of this Environmental Assessment, but also during project implementation and long-term management of the analysis area. The final EA should continue to reflect a holistic understanding of the Carbon River landscape - one that acknowledges the need to balance recreational use with habitat conservation and the upholding of Tribal sovereignty and treaty-reserved rights.

#### **Pertinent Executive Orders**

The Mountaineers noticed that the Pertinent Executive Orders section of the Draft EA, which states that the “the responsible official and/or applicable specialist(s) have determined the proposed action is in compliance with the following Executive Orders (EO), which were deemed pertinent based on the nature of the project,” does not address the potential impacts of the [Immediate Expansion of American Timber Production](#) EO, issued on March 1, 2025 on the proposed actions. We ask the agency to address the impact (or lack of impact) of this EO on proposed actions and strategies related to timber management in the Carbon River Corridor in the final EA.

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We deeply appreciate the U.S. Forest Service’s diligent work to develop this project, and your ongoing stewardship of the Carbon River landscape. Thank you for the opportunity to comment, and we look forward to being informed of future developments.

Sincerely,

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