



January 12, 2026

Via Project Website

Erin Uloth, Forest Supervisor
Mt. Baker-Snoqualmie National Forest,
1000 SE Everett Mall Way, Suite 410,
Everett WA, 98208.

In Reply to: Forest Wide Thinning Project

Dear Ms. Uloth:

The American Forest Resource Council (AFRC) submits the following comments for the Draft Environmental Assessment (EA) for the proposed Forest-Wide Thinning Project.

AFRC represents the forest products industry throughout Oregon, Washington, Idaho, Montana, California, and Nevada. AFRC's members include over 50 forest product businesses and forest landowners. AFRC's mission is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies, and decisions regarding access to and management of public forest lands and the protection of all forest lands. Many of our members operate in communities adjacent to the Mt. Baker-Snoqualmie National Forest (MBSNF), and the management of these lands ultimately dictates not only the viability of their businesses but also the economic health of the communities themselves. The forest products sector in Washington State continues to provide around 40,000 direct and about 100,000 indirect jobs. Many of these are found in rural communities like those in Cowlitz, Lewis, and Skamania Counties and the surrounding areas. In addition to the wages paid, the taxes and other monetary transactions generated by these businesses and family-wage jobs contribute to the infrastructure and well-being of the local communities. AFRC submits these comments on behalf of its members.

Washington and surrounding states continue to face a shortage of raw materials to meet manufacturing demand for wood products. Several mills have closed in the past few years. Vegetation management projects, both current and future, on the MBSNF can help contribute to the wood supply that many mills depend on to continue operating and employing their workforce. The economic activity generated by these treatments contributes to the broader community's well-being.

Sustainable commercial timber harvest on the Mt Baker-Snoqualmie National Forest and neighboring National Forests is critical to our members' near and long-term success. Our members and their contractors and employees rely on the timber output from the MBSNF and surrounding lands, including other National Forests. The economic activity generated by this work also supports local economies and government services across Western Washington. Commercial timber harvesting is critical for the vitality of many rural communities in Washington State.

Additionally, much of the non-commercial and non-timber work proposed in the project will benefit from both economically viable and productive commercial timber projects and healthy and vibrant local economies. Too often, we see 'Purpose and Need' statements where the economic contribution of timber harvest appears to be more of an afterthought or byproduct of the proposed work. However, we would suggest that well-maintained roads supported by timber operations lead to the success of other activities, such as safe and efficient recreational access, and ultimately the ability to accomplish much of the restoration work outlined in these proposals.

Because commercial timber management on National Forest lands provides a substantial economic benefit, we are happy to see the Forest include this benefit in the 'Purpose and Need' statement. However, we always encourage the Forest to raise the priority of and use clearer, affirmative, and stronger language regarding economic contributions in future projects' Purpose and Need statement.

Proposed Action

AFRC generally supports the Proposed Action for this project and believes it will provide the best opportunity for the Forest to meet its intended goals. The sections below cover specific concerns and/or recommendations.

General Comments on the Proposed Action

AFRC would strongly encourage the Forest to develop a strategy to address changed conditions within the planning area. A large-scale proposal such as this provides significant efficiency when proposing and implementing thinning work across the Forest. However, the timeframe needed to complete this work leaves the potential for various disturbances to occur within the planning area. To prevent unnecessary delays in implementation, should an unforeseen significant disturbance occur, we recommend that the MBSNF develop and articulate a strategy to address changed conditions as needed during future implementation of the Forest Wide Thinning Project.

Plantation Thinning Treatments

We explicitly do not support variable-density thinning on Matrix lands for this project. As identified in the EA on page 4, *"over 88% of the MBS was identified as Wilderness, Administratively Withdrawn Area, Late Successional Reserves (LSRs), or Riparian Reserves (RRs)."* This leaves less than 12 percent of the land base available to meet the third item, "Need to provide sustainable flow of forest products," in the "Purpose and Need Statement" for the proposal.

While this thinning strategy may be appropriate for stands in the Late Successional Reserves (LSRs), we are concerned about its use on Matrix lands, especially in younger Matrix lands, where a sustainable timber supply can occur.

Thinning prescriptions in plantations on Matrix lands, especially those under 50 years of age, should focus on spacing and density reduction to foster stand growth and resiliency. Using “skips and gaps” is better suited to treatments in LSRs, where the goal is to create late-seral diversity and structure. And we question this as a long-term sustainable practice for Matrix lands. Thinning prescriptions on Matrix lands, regardless of age, focused on developing late seral conditions, which could hamper the future sustainable supply of wood products from these lands. We want to ensure that all stands, including older stands on Matrix lands, are managed to provide for future regeneration harvests and timber production.

We strongly encourage the forest to re-evaluate the types and scale of proposed treatments/prescriptions on Matrix lands.

For stands proposed for treatment in LSRs, we encourage the Forest to first target stands in the 60-80-year-old class. While the EA specifies that those under age 80 at the time of “harvest” are covered by this analysis, given the limited scale of annual treatments, some LSRs will likely “age out” before the Forest reaches them. We strongly support the age determination at the time of “harvest,” and urge the Forest not to remove this provision from the final EA and decision.

Riparian Reserve Management

AFRC is pleased to see the Forest propose some treatments within the Riparian Reserves. Many streams in the project area were not buffered during the previous harvest operation. Wide “no-cut” buffers can limit the ability to treat the area that would provide the most significant benefit for accelerating desired future conditions for the Riparian Reserves. Though we believe the quantity and intensity of commercial treatment could be increased without impacts on water resources. Creating openings and variable-density thinning can accelerate the attainment of desired future conditions, help meet the project's economic goals, and provide for a diversity of species in riparian areas in the near term.

Harvest Operations

AFRC is pleased to see tethered logging systems included as a timber harvesting method. Providing operators with flexibility in harvesting systems, especially given the current challenge of finding qualified cable systems loggers, is critical to this project's success.

As the Forest and Ranger Districts move into the implementation phase, we encourage the Forest to engage the purchasing community when planning helicopter logging operations. Due to operational costs, potential volume reductions, timing constraints, and more, the risk of creating non-economically viable sales is real. Early dialogue can help the Forest be successful with high-cost projects, such as those presented with cable/skyline or helicopter logging.

Quarry Development

We are pleased to see the Forest include the potential for using rock from existing pits on the Forest. ‘On-Forest’ rock pits and the products that can be made from them (pit run, crushed

aggregate, etc.) can help reduce future costs for maintenance and timber-harvest projects. Costs associated with hauling rock long distances have escalated in recent years, often representing a significant cost in timber sale implementation for our members. The rock source for required and optional roadwork usually influences the economic viability of timber sales. The long distances to commercial rock sources can make timber sales economically unviable.

Additional Project Design Criteria Comments

We are pleased to see the relatively broad operating periods proposed for logging operations in the project. This includes the ability to provide winter operations when possible. This provides for much greater flexibility and supports the economic goals of this proposal. However, we remain concerned about some of the relatively narrow Limited Operating Periods (LOPs) identified in the Project Design Criteria. While we understand most of these are related to ESA obligations, the narrow windows they create for operating the project can significantly challenge the economic viability of the projects being offered. Helicopter and cable thinning operations are most impacted by these. AFRC strongly encourages efforts to minimize these LOPs so that ground operations have the greatest number of available days.

We do suggest that the typical PDC Matrix is easier to review and better understand how and where the various PDCs impact the operation of the work to be conducted in this proposal.

Regeneration Harvest

AFRC strongly supports the application of regeneration harvest in this proposal. As mentioned above, the long-term sustainability of timber harvest on National Forest lands, particularly on Matrix lands, in western Washington, requires that stands be re-initiated. Regeneration harvest is the primary tool for accomplishing this work and ensuring ongoing sustainability. The proposed openings on Matrix lands under this proposal are insufficient to ensure the long-term sustainability of timber supply.

As we mentioned above, Matrix lands are the primary land allocation for the long-term supply of wood products on the MBSNF. Management of the Matrix lands should focus on the future potential for economically viable regeneration harvests. Thinning work on Matrix lands should focus on stand health and resiliency, thereby promoting a long-term, sustainable timber supply from those lands.

Thank you for the opportunity to comment on this project. We look forward to participating in the further development of this proposal. If you have any questions regarding the above comments or additional information, please contact me at 360-352-3910 or mcomisky@amforest.org.

Sincerely,



Matt Comisky

Washington State Manager

American Forest Resource Council