



March 20, 2026

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

Re.: Objection regarding the MBSNF Forestwide Thinning Analysis Final EA (#68852)

Dear Supervisor Uloth,

Conservation Northwest submits the following objection to the U.S. Forest Service's Draft Decision Notice (DN) for the MBSNF Forestwide Thinning Analysis as analyzed in the Final Environmental Assessment (EA) with a Draft Decision Notice and Finding of No Significant Impact (FONSI).

As required, the objector's name, address, and telephone number are below.

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Project Name: MBSNF Forestwide Thinning Analysis

Responsible Official: Erin Uloth, Forest Supervisor

Location: Mt. Baker-Snoqualmie National Forest

Aspects of the Proposed Project Addressed in this Objection

1. The project does not meet the scale of the need to thin plantations on the MBSNF and, therefore, does not meet the project Purpose and Need to provide sufficient habitat for late-successional dependent species, and provide a sustainable (predictable) flow of forest products.
2. Insufficient Vegetation and Silviculture analysis, including stand structure, composition, age, and land use allocation, as well as projected overstory diameter growth and canopy cover.
3. Inadequate FVS modeling (Forest Vegetation Simulator) to illustrate the need and an explanation of how the removal of “recruitment trees” (trees between 20” - 26” DBH) provides habitat for late-successional species now and in the future.

We provide three categories of concerns, supporting reasons, and corresponding suggested solutions. We will work collaboratively with the MBSNF to resolve our objection.

1. Scale of treatments is not enough to meet the project Purpose and Need.

We are concerned that 1,200 acres/year (maximum 36,000 acres over 30 years) is not enough to move the needle on improving heterogeneity, habitat function and species diversity in some of the most homogenous plantations across the 190,000 acre PIA. How was this maximum annual acreage calculated? If less than 20% of the PIA is commercially treated over 30 years, will this project truly increase stand diversity, provide sufficient habitat for late-successional dependent species, and provide a predictable¹ flow to timber to local communities as described in the project purpose and need?

Commercial thinning is an important component of forest health and community well-being. However, to properly thin plantations in a way that improves landscape connectivity, wildlife habitat, timber production, and watershed conditions, the Forest needs to dramatically increase the amount of non-commercial thinning treatments that lead to commercial timber/treatments. Given the current, assumed age of many of the commercial stands identified within the Potential Implementation Areas (PIAs) and the 30-year EA timeframe, we question what percentage of these stands will age out of the < 80-year stand age requirement before the possibility of receiving treatment. With this in mind, we strongly encourage the Forest to link commercial treatments to geographically adjacent non-commercial stands such that funds created by commercial thinning help

¹ Westside growing conditions provide an abundance of timber for potential harvest. Sustainability is not the issue; predictability is the benefit of this EA for industry.

pay for non-commercial treatments. This would put stunted non-commercial stands on an improved trajectory providing better habitat for wildlife while also enabling commercial value in the following decades. This also creates logistical efficiencies where road maintenance is temporally packaged, and crew contracts could be combined creating mobilization efficiencies.

Requested Resolution

- Explain how you calculated the maximum annual acreage, and how you measured the difference between current/departed conditions and future conditions at the landscape scale. How does treating a maximum of 36,000 acres over 30 years improve habitat conditions at the landscape, forest-wide scale? Is the acreage limited by the WWRCZ BO? Is the acreage limited by USFS capacity? Please let us know how/why this acreage was chosen and, if limited by the aforementioned, what could be done to increase acreage should circumstances change.
- Add “watershed condition” and “adjacency to non-commercial stands” to the list of criteria by which commercial treatments will be chosen and prioritized (assuming the other criteria are stand age and accessibility).

2. Insufficient vegetation and silviculture analysis.

The final EA states: “Actual implementation of projects on the Forest will be contingent on meeting the conditions and project design criteria enclosed. Given that conditions change over time, it is not possible to map specific and exact locations for the life of the project, as areas available for treatment will change over time” (Final EA pg. 2).

We recognize that areas available for treatment will change over time due to natural disturbances and other unforeseen circumstances, and that each year PIAs “would be identified for treatment using historical data, existing maps and aerial photographs... field review... LIDAR...to estimate tree canopy height, locate streams, drainages, old roads, and estimate percent slope and aspect” (Silviculture Report pg. 3). However, as a thinning-only EA, the silviculture/vegetation report holds outsized importance and we would like to see more analysis done that will clarify where, when, why, and how treatments will be prioritized.

We know this is not an unreasonable request because in the Gifford Pinchot NF Forest Wide Plantation Thinning & Potential Control Line Treatments Project Final Environmental Assessment², the silvicultural analysis included many of the items listed under *Requested Resolution* below. For example, in the GP’s final EA Figure 1 on page 2 is a map of plantation stands proposed for thinning color-coded by age; Figure 4 on page 19 is a map of potential thinning units over NWFP allocations; Table 10 on page 38 offers projected overstory canopy cover; Table 12 and 13 on page

² <https://www.fs.usda.gov/r06/giffordpinchot/projects/65884>

41 estimate the development of large living trees and multiple canopy layer in 50 years. In the project's silviculture report, Table 3 on page 3 interprets the percentage of structure class based on LiDAR data; Table 4 on page 4 shows the percent of primary plant associations of the proposed thinning units; Figure 1 on page 10 shows the average canopy base height before and after thinning; Table 10 on page 11 show the projected average annual overstory diameter growth over 50 years; and so on. In contrast, the MBSNF Forestwide EA includes one general map of "Potential Implementation Areas" (PIA) which is simply a map that shows where commercial harvest is allowed on the MBSNF. The Silviculture Report and the Vegetation and Silviculture section of the final EA would benefit from a more robust plantation thinning analysis of the 190,000 PIA acres across the MBSNF.

We are comfortable with the four Decision Points for VDT implementation (stands allowing harvest; stands less than 80 at time of harvest; even-aged, single storied plantations; overstocked stands with competition-based mortality). What has not been made clear are the criteria by which these stand treatments (and the watersheds they are in) will be prioritized. We offer prioritization criteria under *Requested Resolution* below. All of the requested information below, especially the prioritization criteria, will help partners help you re: analysis, field recognizance, funding, and implementation.

Requested Resolution

- Where possible – perhaps in the oldest stands – more information regarding stand history, structure, and composition (e.g. "basal area in these stands is concentrated in trees [# - #]" DBH. Tree density is high in portions of all stands with an average of [#] TPA greater than 5" DBH and with some areas exceeding [#] TPA"). At the very least, perhaps a DBH column (range, or average) could be added to Table 1 on page 9 in the Silviculture Report.
- A map of plantation thinning stands overlaid on a NWFP Land Use Allocation map and a MBSNF Land & Resource Management Plan map.
 - How many acres are in LSR?
 - How many acres are in Matrix?
 - What are the age ranges of each stand? Please color-code according to 10-year intervals.
- Projected average annual overstory diameter growth over the next 50 years for each treatment type (LSR and Matrix).
- Projected timeline of overstory canopy cover and closure for each treatment type (LSR and Matrix).
- Where possible – perhaps in the oldest stands – estimated TPA >28" DBH in 20 years and 50 years for each treatment type (LSR and Matrix).
- Where possible – perhaps in the oldest stands – estimated TPA <16" DBH in 20 years and 50 years for each treatment type (LSR and Matrix).

- Disclosed impacts on snag recruitment over time, with and without treatment. We'd like to see explicit metrics regarding the number of snags and large down wood desired per acre and ensure these important structural components exist after treatment by including these metrics as a requirement in thinning contracts. This may include the need to create quality snags during treatment activities so that we can maintain this critical habitat component while we wait for more, large diameter snags to come online organically over time.
- Information on treatment-type placement. For example, "Prioritize gaps around culturally important plants and foods, forage species, and future nest trees. Prioritize skips around snags, legacy trees, downwood, and habitat pockets."
 - Clarify whether or not the 48 acres of landings will be counted toward gap acreage.
- Information about species heterogeneity. Are there Tribally important or climate resilient species you will prioritize keeping on the land (e.g. Western red cedar, Douglas fir, Western White Pine)?
- Tools used for thinning treatments (e.g. hand tools, ground-based equipment, skyline/cable yarding, etc.).
- How stands and project areas will be prioritized (e.g. prioritize treating older stands approaching 80 years of age).
- We request that the following conditions be included in any stand treatment prioritization criteria:
 - Watershed condition (according to the USFS Watershed Condition Framework) (functioning-at-risk categories should be prioritized)
 - Age of stand (older stands should be prioritized)
 - Access conditions (stands with better quality roads should be prioritized; stands that require the repair or development of new, temporary roads should be deprioritized)
 - Adjacency to non-commercial stands (stands close to NCT opportunities should be prioritized)

3. FVS modeling to illustrate how the removal of "recruitment trees"³ (trees between 20" - 26" DBH) provides habitat for late-successional species now and in the future.

There exists potential for an REO exemption allowing for the take of trees up to 26" DBH "in those [LSR and Matrix] stands that meet all other conditions [stands that are even-aged, under 80 years, overstocked and structurally simple] but the current 20-inch diameter limit would prohibit work needed to meet project objectives [increase stand diversity, provide habitat for late-successional species, predictable timber supply, 35% RD and 276 SDI]" (Final EA p. 10). To support this exemption, we need improved FVS modeling (Forest Vegetation Simulator) that

³ Recruitment trees are middle-age trees between 20-26" DBH that are left "online" to grow into large and old trees. We are concerned about the loss of trees in this cohort and a chronological gap in habitat type for a variety of wildlife species.



illustrates the need and an explanation of how the removal of “recruitment trees” (trees between 20” - 26” DBH) provides habitat for late-successional species now and in the future.

Requested Resolution

- An explanation of how the removal of “recruitment trees” (trees between 20” - 26” DBH) provides habitat for late-successional species now and in the future. FVS modeling could be used to illustrate this. How will you ensure that a diversity of tree sizes are left in the stands, specifically in stands with a high volume of 20-26" DBH trees?

Conclusion

We appreciate your consideration of the information and concerns addressed in this objection. We are supportive of this project’s intentions to thin plantations and create improved habitat conditions for a variety of terrestrial wildlife. We want to be sure proposed forest treatments produce net-gain ecological outcomes across the forest. We ask for open communication, collaboration and involvement and look forward to working towards resolution. We respectfully request to meet with the reviewing officer to discuss these concerns and suggested resolutions. Please do not hesitate to contact us with any questions.

Sincerely,

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Laurel Baum,
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Cc: Dave Werntz, M.S., Science and Conservation Director