



SIERRA PACIFIC INDUSTRIES

14353 McFarland Rd. • Mt. Vernon, WA 98273 • (360) 424-7619 • Fax (360) 428-6834

VIA online submission: [Comment Analysis and Response Application \(CARA\)](#)

March 23, 2026

Objection Reviewing Officer, Region 6 Regional Forester
Pacific Northwest Region, USDA Forest Service
Attn: 1570/1950 Objections
1220 SW 3rd Avenue,
Portland, OR 97204

RE: Mount Baker-Snoqualmie National Forest Forestwide Thinning Analysis Objection

Pursuant to 36 C.F.R. Part 218.7, Sierra Pacific Industries (SPI) files this objection to the proposed draft decision for the Mount Baker-Snoqualmie National Forest (MBS) Forestwide Thinning Analysis. Erin Uloth, Forest Supervisor, is the responsible official. The Forestwide Thinning Analysis encompasses the entire MBS.

Although this letter is being written during the Objection Period, it is important to note that SPI supports many aspects of the Analysis and is looking forward to it moving forward to implementation. SPI has been engaged, and participated in, some aspects of the Analysis, including Draft EA comments on January 12, 2026.

Objector

Sierra Pacific Industries
14353 McFarland Road
Mount Vernon, WA 98273
(360) 424-7619

Sierra Pacific Industries is a fourth-generation family-owned company based in Anderson, California that employs over 6,500 employees nationwide and operates a combined 16 sawmills in California, Oregon, and Washington. These sawmills rely on timber that is generated on Federal Forests, including the Mount Baker-Snoqualmie National Forest. The Forestwide Thinning Analysis will, if properly implemented, help ensure a reliable supply of public timber in an area where the commodity is greatly needed.

Objector's Designated Representative:
Adam Ellsworth, Log Procurement Manager

14353 McFarland Road
Mount Vernon, WA 98273
360-424-7619 ext.1412
aellsworth@spi-ind.com

The content of this objection below is based upon the prior specific written comments submitted by SPI in response to the Draft EA.

1. There are multiple objectives of Matrix land allocations, including an emphasis on a sustained yield of timber production. This emphasis is only achieved when projects are economically viable. The economic viability of thinning projects continues to be challenging as equipment, labor, and fuel costs continue to rise. Also, reductions in local manufacturing infrastructure make it no longer economically viable to remove low value material. There are currently no facilities north of Olympia that will accept low value pulp material. In general, even-aged variable retention harvests are more economically viable than thinning and should be the primary harvest type within Matrix.

Resolution Requested

SPI requests that the Deciding Official focus thinning efforts in land allocations other than Matrix. Also, any thinning in Matrix should be limited to Riparian Reserves that are immediately adjacent to even-age variable retention harvests.

2. In relation to the previously mentioned topic, the Purpose and Need includes a need to provide a sustainable flow of wood products. SPI agrees with this statement and wants to remind the MBS that a sustainable flow should include the ability to operate year-round, including on thinning projects. Manufacturers, contractors, lumber brokers, etc. serve markets on a daily basis, not just June through mid-October. It is understood this comment is outside the scope of this project, as listed in the Response to Comments, however it has impacts on project viability, including contractor availability.

Resolution Requested

SPI requests that the Deciding Official encourages staff to analyze and prepare contracts that allow for year-round operations.

3. The stated desired condition for the analysis area of this project is to have healthy, vigorous forest stands with diverse native species composition and structure. This should be the case whether a stand was naturally regenerated or not. It is concerning that after receiving comments to not analyze or treat naturally regenerated stands, the Decision Points have been revised to only include “previously managed stands”.

Resolution Requested

SPI requests that the Deciding Official revise the Decision Points to include naturally regenerated stands whether previously managed or not.

Request for Resolution Meeting

Pursuant to 36 C.F.R. § 218.11, the objectors request to meet with the reviewing officer to discuss the issues raised in this objection and potential resolution. In the event multiple objections are filed on this decision, SPI respectfully requests that the resolution meeting be held with all objectors present. SPI believes that having all objectors together at one time, though perhaps making for a longer meeting, in the long run will be a more expeditious process to either resolve appeal issues or move the process along. As you know, 36 C.F.R. § 218.11 gives the Reviewing Officer considerable discretion as to the form of resolution meetings. With that in mind, SPI requests to participate to the maximum extent practicable, and specifically requests to be able to comment on points made by other objectors during the objection resolution meeting.

Thank you for your efforts on this project and your consideration of this objection. SPI looks forward to our initial resolution meeting. Please contact our representative, Adam Ellsworth, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,

A handwritten signature in blue ink that reads "Adam Ellsworth". The signature is fluid and cursive, with the first name "Adam" and last name "Ellsworth" clearly distinguishable.

Adam Ellsworth
Log Procurement Manager
Sierra Pacific Industries
Burlington Division