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Comments: Erin Uloth, Forest Supervisor

Mount Baker-Snoqualmie National Forest

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RE: Forest-wide Thinning Treatments Project Draft Environmental Assessment, Mt Baker Snoqualmie National Forest (MBS)

Dear Supervisor Uloth:

Thank you for the opportunity to comment on the Forest-wide Thinning Treatments Project, Draft Environmental Assessment (EA). The analysis area includes lands in the heart of the Mountains to Sound Greenway National Heritage Area (NHA), which is the Congressionally designated area that stretches from Seattle to Central Washington. Here at the Mountains to Sound Greenway Trust, the coordinating entity of the Greenway NHA, we deeply value our decades of productive partnerships with the MBS. In that spirit, please consider the following comments:

We appreciate the need for strong forest management which includes thinning in appropriate areas as identified by on-the-ground assessment of timber volume, forest health, accessibility, fish and wildlife requirements, and protection of recreational areas. The proposed plan will set MBS forestry policy through the middle of the century, yet the EA provides little specific detail. We believe a project of this scale should be analyzed by a full EIS and include a range of alternatives. An EA with just one action alternative is a missed opportunity for useful public input and support.

The EA Conceptual Map does not provide location-specific details, which raises concerns about what may be planned for lands of great importance to the Mountains to Sound Greenway Trust. For example, since the 1990s, we've worked with the MBS, Washington DNR, King County and community partners on the restoration of the Middle Fork Snoqualmie River Valley. Together we've restored a landscape damaged by past timber practices and unmanaged public use. All actions have been based on comprehensive analyses by MBS planners and scientists, improved by thorough community engagement. For example, the 2005 ATM Plan (Middle Fork Snoqualmie River Watershed Access and Travel Management Plan and Forest Plan Amendment #20) set the stage for two decades of restoration work.

The EA Conceptual Map includes road systems that were decommissioned decades ago at the direction of the Middle Fork ATM. We hope these high elevation road systems - removed at great cost - will not be rebuilt. Middle Fork ATM Decision Notice, p. 11 .... roads obtained in the Huckleberry Land Exchange and most of the spur roads off Roads 5600 and 5640 were constructed for timber harvesting; these roads are no longer needed. Due to insufficient funding they have not been adequately maintained: many are not drivable or are brushed-in and difficult to drive. Because these roads are not being maintained to the standard for which they were designed, there is a concern over the potential for increased road sediment into aquatic systems, and mass wasting and road fill failures. ... decommissioning 23.2 miles of road and treating and converting 7.6 miles of Road 5600 will have greater value to soil and water resources by reducing the risk of catastrophic failure and chronic road erosion and by restoring natural flow patterns and floodplain function (as the roads will no longer divert runoff down or intercept subsurface flow).

Also noted on the EA Conceptual Map are Bessemer Mountain sections obtained in the Huckleberry exchange. All surrounding lands are within the Washington DNR-managed Mt. Si NRCA.

Most of the MBS roads on Bessemer were decommissioned between 2005 and 2011 with federal funding. MBS lands on Bessemer Mountain are largely inaccessible by road due to a catastrophic washout that started near the treeline and dropped to the area of the CCC trail, at roughly 1,300 feet elevation. This area, popular for hiking and mountain biking, seems a poor fit to prioritize for commercial thinning and road reconstruction.

More generally, as we see the increasing impact of climate change on forest road systems, how would the overall Forest-wide Thinning Treatments Project ensure that road construction and logging in steep, high elevation mountain valleys will not worsen existing washouts or road failures throughout the MBS?

Invasive Weeds - Forest-wide Thinning Treatments EA, p. 37 ... The actions proposed in the alternative would increase the potential for introduction, establishment, and spread of high priority invasive species. However, the implementation of associated PDCs would minimize spread and change of these species.

We agree that the proposed actions will introduce and spread invasive weeds, both high priority species as determined by the MBS and other destructive weeds that are listed as Washington State noxious weeds but are not regulated by most counties (such as spotted jewelweed).

However, as of last year, the MBS had only one staff person assigned to weed control - and rock quarry inspections - across the entire National Forest. Given the historic lack of funding for this work, we would hope to see federal support for higher staffing levels at the MBS in order to remove and control invasive weeds effectively.

Given the importance of forest management and forest health, and in order to fully consider perspectives from Tribes, community members, and technical experts, we would appreciate a longer comment period and encourage the Forest Supervisor's office to extend the deadline.

Sincerely,

Jon Hoekstra, Executive Director

Mountains to Sound Greenway Trust