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Comments: To: Erin Uloth

Forest Supervisor

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Submitted online via CARA and transmitted via email to: comments-pacificnorthwest-mtbaker-snoqualmie@usda.gov

RE: Draft EA for Mount Baker-Snoqualmie Forestwide Thinning Project (#68852)

Dear Ms. Uloth,

Thank you for the opportunity to comment on the draft Environmental Assessment for the Mount Baker-Snoqualmie Forestwide Thinning Project.

RE Sources is a non-profit organization located in northwest Washington and founded in 1982. We work to protect the health of northwest Washington's people and ecosystems through the application of science, education, advocacy and action. RE Sources has thousands of supporters in Whatcom, Skagit and San Juan Counties, and we submit these comments on their behalf.

As a local nonprofit focused on building climate and community resilience for our region, we recognize the role that active management can play in achieving both of these outcomes when applied through an ecological forestry lens. We value the potential that the MBS Forestwide Thinning project has- if done right- to address both ecological and local economic needs of the region by addressing the ongoing impacts of historical land management decisions on forest resilience and watershed health. We also believe that appropriate implementation of targeted, intentional forest restoration activities on federal lands offers our region the opportunity to advance the broader work of outfitting western Washington with a forest economy that meets the moment of our climate-changed 21st century, and better serves rural communities that are at the frontlines of both climate and economic crises.

The last decade has seen increased public interest in and understanding of legacy impacts of intensive 20th century logging on federal, state, and private lands; and a growing body of research underscores the outsized role that older, structurally complex Western WA Douglas Fir/Western Red Cedar/ Western Hemlock forest types play in sequestering atmospheric carbon compared to other forest types globally. Because of this, it is crucial that a thorough, transparent, and engaging assessment of environmental impacts is provided to build public trust in the ecological and climate merits of conducting active management-based forest restoration work on federal lands.

Please accept the following comments on the draft EA and project review process:

Summary Comments

Project Scope and Scale Lacks Detail

We feel that the forestwide scale of the EA does not allow for the level of detail needed to adequately assess project impacts on a more regional level. Without clear identification of stands and areas targeted for treatments within each MBS district, nor clear criteria for how work will be prioritized across the forest over the 30 year

project timeline, it is not possible for stakeholders to provide specific, material, place-based feedback and recommendations to help strengthen project implementation and outcomes.

Please conduct a full EIS for the Mount Baker-Snoqualmie Forestwide Thinning Project #68852 to comprehensively assess the impacts of this project's notably broad scope and scale, in line with similar forest-wide and district-level projects in the USFS PNW Region.

Please also consider splitting the project into four sub-area projects correlating with each MBS district. Consider using a 10-year timeline for each of these sub-area projects to allow for more specific consideration of stands targeted for treatment and overall project impacts either through an EIS, or scoped such that an EA is adequate for the project being considered.

More Data Analysis and Map Layers needed

In addition to the Potential Implementation Area (PIA) map provided in the EA, we recommend including the additional layers requested by a number of organizations to clarify details such as the number of acres in need of thinning treatments, the proportion of acres designated Matrix vs Late Successional Reserve (LSR), etc. This is important context for understanding the nature of the proposed project activities.

Support use of Ecological Forest Management across land types

We support the use of ecological forest management prescriptions to achieve the project's stated structural complexity, biodiversity, and habitat goals in both LSR and Matrix lands within the described parameters; including treating only plantation stands less than 80 years of age and minimizing gap sizes within LSRs. (*See comment below about this criteria language)

Prioritize Tribal Consultation at every stage

The USFS must continue to engage and integrate the feedback from all impacted Tribes throughout every stage of project development and implementation. Engagement efforts may need to be adapted to reach and meaningfully consult with Tribes that have not yet been engaged.

Remaining Questions and Concerns to Address

Specialist Reports - Climate Change

We noted that a specialist report outlining the potential impacts of climate change was not included in the draft EA. Please consider including a Specialist Report on Climate Change impacts in the final project assessment to identify conditions which may require adaptive management adjustments to project parameters over the course of the 30-year project timeline.

Need for monitoring plan throughout project timeline

The project needs clearly outlined monitoring plans to assess impacts and inform adaptive management decisions throughout the duration of the 30 year project timeline, and particularly for a pre-determined period of time following completion of restoration activities in each area.

Lack of clear policy for dealing with old growth remnants and naturally-regenerated second growth forests
Language is needed within treatment description sections of the analysis to explicitly address old growth remnants and non-plantation 2nd growth stands within PIA. These areas should be excluded from thinning as they reflect the desired future condition that VDT prescriptions intend to expedite in replanted/overstocked plantation stands. "Thinning from below" should be prioritized in stands with a significant number of trees 20-26" DBH or more to enhance the growth of established older forest stands rather than encouraging a cohort of younger trees to grow into the thinned stand over a longer timeline.

Criteria for prioritization of potential project areas

More detail is needed to understand how MBS will prioritize treatments of eligible stands both spatially across the

forest as well as temporally throughout the 30-year project timeline. What will be done with regard to currently eligible forest stands that may "age out" of the 80 year threshold before receiving treatment?

Impact on other current or recently completed projects in MBS

More detail is needed to understand how the FWT project interacts with other projects such as the North Fork Nooksack Vegetation Management Project. Are there overlapping project areas in consideration for future re-entry through this FWT?

Support more robust public engagement in MBS projects - in the future, please consider a longer public comment period, or issuing a pre-comment period notice to communities in order to give stakeholders adequate time to prepare thoughtful and substantive feedback; especially when coinciding with major holidays. If possible, please avoid scheduling comment periods during major holiday periods.

Broad public support from a variety of stakeholders and communities across the MBS is crucial to achieving the Forest's project goals outlined in the EA. Conducting more detailed analysis of project impacts and providing more specific details on district-level priorities and activities will support building public trust and confidence in agency management activities, and generate more actionable and relevant feedback for project managers from stakeholders.

Please evaluate the suggested avenues for a more detailed environmental analysis for the MBS FWT Project and consider incorporating them into the final assessment.

Thank you very much for considering our comments, and we look forward to continued engagement in service of a successful project outcome.

Sincerely,

Kaia Hayes
Land & Water Policy Manager
RE Sources