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Comments: Public Comment on the Draft Environmental Assessment

Mt. Baker-Snoqualmie National Forest - Forestwide Thinning Project

Submitted by the Center for Responsible Forestry (CRF)

Overview and Organizational Interest

The Center for Responsible Forestry (CRF) submits the following comments on the Draft Environmental Assessment (EA) for the Mt. Baker-Snoqualmie National Forest Forest-wide Thinning Project. CRF advocates for responsible forest management grounded in ecological science, climate resilience, and public accountability on Washington's public lands.

CRF recognizes that portions of the Mt. Baker-Snoqualmie National Forest include simplified, even-aged stands resulting from past commercial forestry practices that prioritized short-term revenue over ecological function. Thoughtful restoration of such areas can be appropriate when narrowly targeted, scientifically justified, and transparently reviewed. However, the proposal evaluated in the Draft EA far exceeds those bounds.

As designed, the Forest-wide Thinning Project establishes a sweeping, long-term authorization for commercial logging and road construction across the forest without sufficient environmental analysis. For the reasons outlined below, CRF concludes that preparation of a full Environmental Impact Statement (EIS) is required under NEPA.

Programmatic Design and NEPA Noncompliance

The Forest Service proposes to authorize up to 1,200 acres of commercial thinning annually for a period of 30 years, applied forest-wide. This effectively creates a rolling, open-ended approval for logging activities that would substantially increase timber output and associated infrastructure development over multiple decades.

Such a large-scale, long-duration authorization is incompatible with analysis through an EA. The proposal commits the agency to a specific level of extraction while deferring meaningful evaluation of site-specific, cumulative, and long-term impacts. Courts have consistently held that agencies may not postpone environmental review when programmatic decisions lock in future effects.

By pre-approving the intensity, duration, and geographic scope of logging while delaying detailed analysis to later stages, the Forest Service:

Limits meaningful site-specific review;

Undermines adaptive management by fixing assumptions decades in advance; and

Fails to account for changing ecological conditions, climate impacts, and wildfire dynamics.

NEPA requires that agencies take a hard look at reasonably foreseeable impacts before committing resources, not after.

Required Change: Either prepare a full EIS or substantially reduce the project's scope and duration, dividing it

into discrete 5-10 year projects with independent environmental review.

Ecological Risk and Lack of Enforceable Treatment Limits

The EA frequently characterizes the project as targeting young, simplified stands—often described as plantations—but does not include binding criteria that would actually restrict treatments to replanted second- or third-growth forests. Instead, discretionary language allows thinning in naturally regenerated stands that may already be developing structural complexity and future legacy characteristics.

This lack of enforceable limits creates a significant risk of degrading developing mature forest conditions and contradicts the stated purpose of increasing forest complexity. NEPA requires that a proposed action be clearly defined so impacts can be meaningfully analyzed and disclosed to the public.

The problem is compounded by the proposal to increase the maximum allowable harvest diameter to 26 inches, a change that departs from existing Northwest Forest Plan standards without adequate scientific justification.

Required Change: Establish clear, measurable definitions for stand eligibility, provide scientific support for any changes to diameter limits, and identify specific stands proposed for treatment.

Fire Risk Claims Are Insufficiently Supported

Wildfire risk is frequently cited by the public and policymakers as a rationale for thinning projects, yet it is not clearly incorporated into the project's Purpose and Need statement. This omission narrows the scope of alternatives and limits scrutiny of whether the proposed actions would meaningfully reduce fire risk.

The EA fails to adequately engage with contemporary fire science showing that:

Commercial thinning in west-side backcountry forests does not reliably reduce high-severity fire;

Road construction and canopy opening can increase ignition risk and fire spread; and

Fire risk reduction is most effective near infrastructure and within plantation-dominated landscapes.

If fire risk reduction is an intended outcome, NEPA requires the Forest Service to rigorously evaluate whether the proposal actually achieves that goal.

Required Change: Conduct a comprehensive analysis of wildfire risk and long-term fire regime impacts within a full EIS.

Climate and Carbon Impacts Are Not Analyzed

Despite authorizing decades of commercial thinning and road construction, the Draft EA contains no meaningful assessment of net carbon movement or climate impacts. It does not quantify emissions from tree removal, soil disturbance, or roads, nor does it evaluate foregone sequestration or alternative scenarios that could enhance long-term carbon storage.

This omission prevents informed decision-making and violates NEPA's requirement to analyze reasonably foreseeable climate impacts, particularly for a project of this scale and duration.

Required Change: Include a comprehensive analysis of net carbon impacts and cumulative climate effects over the life of the project.

Implementation and Public Participation Deficiencies

The Draft EA proposes a 30-day annual public comment period to review selected thinning units. Given the unprecedented scale of the project—adding an estimated 36 million board feet per year across a large and ecologically diverse forest—this timeframe is insufficient for meaningful public engagement.

Effective review requires adequate time to evaluate site-specific conditions, cumulative impacts, and consistency with project objectives.

Required Change: Extend the annual public review period to no less than 180 days.

Conclusion

CRF supports science-based restoration of degraded plantation forests where such actions are narrowly tailored, transparent, and ecologically justified. The Forestwide Thinning Project, however, is too expansive, too long-term, and too vague to comply with NEPA or to ensure protection of developing mature forests, climate values, and public trust resources.

Given the likely significant effects associated with extensive logging and road construction across the Mt. Baker-Snoqualmie National Forest, the Forest Service must:

Prepare a full Environmental Impact Statement;

Clearly identify treatment areas and provide GIS data with adequate review time;

Reduce project duration and divide it into smaller, discrete projects;

Explicitly limit treatments to replanted plantation stands;

Restrict new road construction and mechanical access;

Incorporate best available wildfire and climate science; and

Analyze long-term net carbon impacts.

Thank you for the opportunity to comment.

Center for Responsible Forestry (CRF)