Data Submitted (UTC 11): 1/13/2026 6:28:13 AM
First name: Wendy
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Organization:
Title:
Comments: Dear Mr. Franklin,
Thank you for the opportunity to comment on the Draft Environmental Assessment (EA) for the proposed Forestwide Thinning Treatments Project (FWT) in the Mt Baker - Snoqualmie National Forest (MBSNF). I am a fisheries biologist by training and professional career, and I possess a MA degree in Ecology and Systematics from San Francisco State University, as well as a BS degree in Fisheries and BA degree in Biology from Humboldt State University. I am a frequent user of the MBSNF, having camped, hiked, and whitewater rafted in many areas including the Highway 542 corridor, Highway 2 corridor, Mountain Loop highway, Baker Lake and the Highway 20 corridor, and have conducted quite a few spawning and stream habitat surveys of streams in the Nooksack, Skagit, and Stillaguamish watersheds when I worked at the Mt. Baker Ranger District for 5 years.

Scope of the environmental review
The U.S. Forest Service has decided that a forestwide project that will likely entail decades across multiple watersheds and around ten thousand acres, that "may affect and is likely to adversely affect" three different federally listed fish species and their designated critical habitats, and two different federally listed bird species and their designated critical habitats, and "may likely adversely affect" a sensitive fish species, is worthy only of being considered in an EA. A project of this scope is likely more appropriately considered in an Environmental Impact Analysis, which would consider cumulative effects over time and space, and over a landscape level.
While the purpose and need given of increasing stand diversity, providing habitat for late-successional dependent species, by accelerating old-growth conditions while providing timber, certainly seems beneficial, there is a lack in the level of specificity and detailed information needed. Only one very small scale map showing the entire forest with miniature polygons is provided to indicate the potential thinning units. The EA should provide at the very least maps on a watershed, or preferably, a subwatershed scale. The lack of appropriate scale maps renders the analysis provided inadequate to support the project. The supporting documentation does not provide any greater in-depth or current information about watershed conditions in the proposed treatment areas, other than generalized road densities.
The EA does not identify thinning units by location or acreage, and does not state when units will be thinned. The EA seems to indicate that much of the analysis will occur at the project scale, and the EA does not provide enough information to the public to allow for reasonable comments at the level of project scale.
The EA provides only one action Alternative. One alternative approach would be for the FWT to be broken up into separate 10-year projects for each of the four Ranger Districts, for a total of four projects. Dealing with smaller pieces of the MBS will make the scope of the project easier to understand, and will facilitate better understanding of specific impacts within particular locales.

Large woody debris (LWD), downed and dead wood (DDW), old growth conditions, and riparian buffers
It is unclear what is the level of wood to be extracted or what part of this prescription addresses the level of DDW and LWD of old growth stands it intends to mimic. There is data and science available that indicates better tree growth with greater DDW. Woodall and Westfall, 2009 found that DDW increased as relative density increased, and tree biomass improved with more DDW. The prescriptions should address how DDW will be dealt with to both preserve this reservoir of wood that would have accumulated over time to feed the forest soil; but the prescription shows DDW being extracted by harvest. There are other forest processes and features related to downed wood that are being skipped in the process and these should be addressed in the project's environmental review. The EA seems to focus only on one old growth element, tree spacing - which should not be the sole indicator of an old growth stand. Other natural processes and functions must also be considered (i.e., down wood, multilevel vegetative growth below the tree canopy, soil health).
The EA states that all wood slash will be removed for fire prevention, but it would be important to instead find a balance between removing slash for fire prevention and allowing some to remain for forest ecological functions.

Allowing riparian areas to remain intact within at least one site potential tree height of all streams, regardless of fish presence or absence, would allow for retention of bank and channel stability, large woody debris recruitment, and maximum shade, and would be better for stream channel processes than would a reduced riparian area. Many streams are likely already wood deficient, making sufficient riparian buffers more important. The potential for blowdown in a thinned riparian area would have the effect of further reducing the riparian buffer, which could have negative effects, at least temporarily.

A few items that appear lacking in the EA include:
*No analysis of how the project will affect existing and future climate change impacts or climate resilience, and how that will affect fire risk, stream conditions, forest health, and wildlife populations.
*No analysis of how the project will affect standing dead tree abundance, which is important to wildlife species such as woodpeckers and other cavity nesters.
*No analysis of how the project would affect Wild and Scenic River values, and there are several Wild and Scenic Rivers within the project area.
*Examples of similar projects in the Pacific Northwest that have been successful in achieving the goals of this project.
*Discussion of how thinning, especially in new and existing road corridors, would encourage invasive vegetation and how that would affect forest structure.
*Discussion of how thinning might encourage possible dense, single species stands in newly opened areas.

I do appreciate the work that has gone into this document, and am hopeful that the MBSNF will consider doing an EIS to better analyze the potential project effects, and to develop monitoring and mitigation that will best offset negative impacts to this very special place.

Sincerely,
Wendy Cole
Bellingham, WA
Reference:
Woodall, C. W. & Westfall, J. A. Relationships between the stocking levels of live trees and dead tree attributes in forests of the United States. For. Ecol. Mgmt 258, 2602-2608 (2009).