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First name: Eric

Last name: Johnson

Organization: Skagit County

Title:

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Tim Lieske, Natural Resources Staff Officer

Mount Baker-Snoqualmie National Forest

1000 SE Everett Mall Way, Suite 410

Everett, WA 98208

RE: Skagit County Comments, Mount Baker-Snoqualmie National Forest, Forestwide Thinning Treatments Project Draft Environmental Assessment

Mr. Lieske:

Thank you for the opportunity to comment on Mount Baker-Snoqualmie National Forest's Forestwide Thinning Treatments Project, Draft Environmental Assessment.

It is important from the onset to express our support for this project. This is a very important project to provide economic benefits to struggling rural economies and communities that have long been dependent on forest and natural resource industries.

Skagit County is encouraged by this project and the effort to improve forest health, balance environmental protection while most importantly moving towards a more sustainable and predictable volume of marketable commercial timber from Mount Baker-Snoqualmie National Forest (MBSNF) - all of which are vital to our rural communities and the future of the forest products industry in Skagit County. We believe that it is important that our federal lands provide functioning forest ecosystems while also producing a sustainable volume of timber harvest to support a viable forest product industry to meet the demands of consumers and supply materials for our affordable housing crisis.

Historically, timber revenue from MBSNF was a significant portion of revenue to Skagit County that supported a range of community services, public health and safety, criminal and civil justice systems, and our county road system. Timber sales from private, state and federal lands have long provided family wage jobs within our communities through an array of local businesses including road building, timber harvest, the provision wood to mills, and ancillary economic stimulation and other business activities. The lack of federal timber sales in Skagit County over several decades has directly impacted our ability to provide public services and reduced the availability of locally sourced logs to our mills that provide family wage jobs, health care benefits, contribute significant tax base for vital public services, and produce sustainable building materials to our community industries.

Our review finds that this project offers a valuable opportunity and pathway for the Forest Service to achieve a more effective forestwide restoration strategy. We concur with your Draft Environmental Assessment (Draft EA) that the current MBSNF management practices "fail to provide the diverse habitat needed" and this project will "increase structural diversity of overstocked and planted stands and provide a sustainable flow of timber to local communities."

Skagit County offers the following comments regarding the project and the Draft EA:

*Prioritize older timber stands. The Draft EA targets forested stands that are less than 80 years old at the time of harvest. Understanding that the planned commercial restoration treatments will occur over the next 30 years, it is imperative to initiate projects on the oldest stands first.

*26 inch diameter at breast height (DBH). Skagit County supports increasing diameter for tree removal of 26" DBH to "meet project objectives", as noted in the Draft EA. Additionally, it should be made clear that 26" DBH is determined at the time of timber sale bid, not time of harvest.

*Riparian. We believe the appropriate riparian protections that MBSNF should follow are those found in the regulatory framework of the Washington State Forest Practices Act and the State of Washington's Forest Practices Habitat Conservation Plan (FPHCP). There is a need to bring consistency and harmonization of the forest riparian protections and treatments on harvests evaluated by the Draft EA with Washington State laws and regulation which have undergone rigorous peer reviewed science, monitoring, and evaluation. These rules acknowledge that regulating a forest riparian zone with a no-touch buffer may not provide the outcomes necessary to protect water temperature, quality and quantity, as well as overall forested riparian habitat improvement.

*Rock and quarries. Further and additional development of rock sources need to be developed to support operational efficiency and maintenance of projects. There is not enough rock pits located to support the maintenance and reconstruction of existing roads nor the temporary roads needed to access project areas. The USFS needs to identify rock pits and access to rock supply closer to projects to minimize excessive hauling costs, increase carbon emissions, and achieve the desired "cost-effective" transportation system envisioned in the Draft EA.

*Fisheries. For over 25 years, Skagit County has been a leader in working with our tribal partners, agriculture and forest land owners, and other organizations and stakeholders in our commitment to salmon recovery. We have led and participated in watershed planning and restoration projects, land use planning and regulations, voluntary stewardship programs, and systematically removed fish passage barriers on county roads.

With this in mind, we respectfully disagree that the implementation of this project action, which will only treat up to 1200 acres of the 1.72 MILLION ACRES of the MBSNF annually, will have any adverse impact on Puget Sound Spring Chinook Salmon, Puget Sound Steelhead Trout, or Puget Sound Bull Trout. In fact, as noted in the Draft EA, "Tributaries in those unthinned/unmanaged areas are expected to continue to undergo natural processes including normal... Floods, fires, hillslope failures, etc". It is quite likely that a "no action alternative" will increase the risk of these catastrophic events and the degradation to these fishery resources.

*USFS operational capabilities. Quite frankly, we are concerned about the ability of the USFS to implement the commercial thinning treatments proposed within the Draft EA given both the MBSNF current funding and staffing limitations. Skagit County, and other partners that want to see the outcomes of this project are prepared to support MBSNF in securing adequate funds and personnel to assure implementation of the proposed action. USFS will need additional field personnel and other USFS staff to fully implement the Draft EA's Proposed Action. We want to stress the critical need for enhanced partnerships to ensure completion of these essential forest health treatments outlined in the Draft EA.

*Period of timber harvest operations. Operations on State and Private Lands governed by the Washington State Forest Practices Act allow year-round timber harvest operations under certain rules, regulations, and best management practices. The USFS should allow this as well. This practice will help provide a more steady and sustainable flow of timber to forest product businesses and industries throughout the year. Expansion of operational windows adds value to the Forest Service, contractors, and mills.

*Economically feasible projects. Fundamentally, for this project action to be successful, the USFS must be

cognizant of the economics. Projects must be designed to assure a profitable margin for potential bidders, desired environmental outcomes, and positive economic benefits.

Our recommendations are intended to remove operational constraints placed on contractors implementing project goals, improve efficiency of operations for the MBSNF staff, and improve the functioning forest ecosystem. Reducing unnecessary operational constraints will be necessary to achieve the goals of this proposal and will add value to the Mount Baker-Snoqualmie National Forest.

We appreciate the commitment of MBSNF leadership and staff effort to restore a healthy forest ecosystem and assure a sustainable flow of timber from our local federal forest lands to support our rural economies. We believe the approval of the Forestwide Thinning Treatments Project Draft Environmental Assessment is a positive step in meeting these objectives. Thank you for considering our comments.

Sincerely,
BOARD OF COUNTY COMMISSIONERS
SKAGIT COUNTY, WASHINGTON

Ron Wesen, Chair Peter Browning, Commissioner