

Nichol Phillips
Washington State Executive Director
Pacific Northwest 4-Wheel Drive Association
nicholphillips@comcast.net | 253-377-8240



Date: February 9, 2026

Re: Objection to Decision Notice/FONSI

Forestwide Thinning Treatments Project (PALS #68852)
Mt. Baker–Snoqualmie National Forest, Region 6

To the Reviewing Officer:

Pursuant to 36 CFR Part 218, I submit this objection to the Decision Notice and Finding of No Significant Impact (DN/FONSI) for the Forestwide Thinning Treatments Project. The issues raised below were presented in my written comments dated December 13, 2025, and the Final Environmental Assessment (EA) fails to cure those deficiencies.

Recreation access impacts remain inadequately analyzed.

First, the Final EA continues to assert that implementation locations are unknown, while simultaneously relying on mapped Potential Implementation Areas identifying extensive road-adjacent treatment zones. Because impacts to recreation access are reasonably foreseeable, NEPA requires disclosure and analysis based on available information (40 CFR §1508.1(g)). The EA does not reconcile this contradiction or provide spatially explicit recreation analysis.

Second, despite explicit comments, the EA again fails to analyze motorized recreation as a distinct, road-dependent use, instead of treating recreation generically. Motorized users are disproportionately affected by haul closures, temporary road construction, decommissioning, and access restrictions. Data gaps for dispersed recreation do not excuse dismissal of impacts.

Third, although the project authorizes implementation for approximately 30 years, the EA analyzes closures and access restrictions in isolation. Serial “temporary” closures within the same corridors constitute functional long-term access loss and require cumulative effects analysis, which the EA does not provide (40 CFR §1508.1(g)(3)).

Finally, the EA relies on wildlife mitigation measures that reduce public access (seasonal closures, reduced road density, decommissioning) without disclosing the tradeoff with recreation opportunity, and without defining closure duration, frequency, or enforceable reopening commitments.

Because these deficiencies remain, the DN/FONSI conclusion that recreation impacts are insignificant is not supported by the administrative record. NEPA requires agencies to take a hard look at reasonably foreseeable effects before issuing a FONSI (40 CFR §1501.6).

Requested Remedy

I respectfully request that the Responsible Official:

1. Withdraw the DN/FONSI;
2. Revise the EA to include spatially explicit recreation access analysis;
3. Analyze motorized recreation as a distinct use;
4. Evaluate cumulative access impacts over the project duration; and
5. Reevaluate significance based on corrected analysis.

I request to participate in the objection resolution process.

Respectfully submitted,

Nichol Phillips

Washington State Executive Director

Pacific Northwest 4-Wheel Drive Association

waexec@pnw4wda.org