



Naturam Expellas Furca

Tamen Usque Recurret

WISE USE MOVEMENT

P.O. Box 17804, Seattle, WA 98127

June 9, 2026

Erin Uloth
Forest Supervisor
Mt. Baker-Snoqualmie National Forest,
1000 SE Everett Mall Way, Suite 410,
Everett WA, 98208

Submitted electronically to: FS-comments-pacificnorthwest-mtbaker-snoqualmie-mtbaker@usda.gov

Re: 2025 Mt. Baker Geothermal Consent to Lease Draft Environmental Assessment Comments

The following are the comments of the Wise Use Movement:

EIS REVIEW

While the Wise Use Movement is generally supportive of alternative forms of electrical energy production such as wind, solar, and geothermal, all of these types of projects can have significant adverse impacts on the environment and require careful alternatives and impact analysis. In particular, the WUM is concerned when Federal agencies segment projects, by concluding that they are merely a link in a chain of decision making that postpones environmental review to some later date. The National Environmental Policy Act, Sec. 106, provides:

An agency is not required to prepare an environmental document with respect to a proposed agency action if— (1) the proposed agency action is not a final agency action within the meaning of such term in chapter 5 of title 5, United States Code;

It is clear that the Mount Baker-Snoqualmie National Forest's (MBSNF) "consent to lease process" is described in the Draft Environmental Assessment (DEA) as a project and should the MBSNF decided to refuse to lease, it would constitute a final agency action for the MBSNF.

The DEA attempts to portray itself as an "administrative analysis" but goes on to refer to the proposed action as a "project.":

“This project is a focused administrative analysis to determine whether nominated parcels of National Forest System (NFS) lands are available for geothermal leasing. The ‘action’ of consenting to lease has no environmental impact on any resource because it does not include any ground-disturbing activities. Additional environmental analysis will be required to authorize any ground disturbing activities if a parcel is leased and development is planned.

...

The Mt. Baker-Snoqualmie National Forest (MBS) is responding to BLM requests of March and June of 2025 to grant consent to lease 60,097 acres of nominated parcels of NFS lands for geothermal exploration and development. **This project** evaluates the surface suitability of the nominated parcels. The MBS will determine if the lands should be leased, leased with stipulations, or withdrawn from further consideration for leasing and subsequent development activities. **This project** does not make the decision to grant leases or authorize any exploration or development activities.” *DEA, p. 1.*

In fact, the DEA states that “This environmental assessment relies on the following environmental impact statements and plans which are incorporated by reference. . .” *DEA, p. 1.*

Also:

“**This project** tiers to the Final Programmatic Environmental Impact Statement for Geothermal Leasing in the Western United States (PEIS) (December 2008), which facilitates geothermal leasing decisions in the western United States.” *DEA, p. 2.*

and

“The purpose of **this project** is for the USFS to consider whether to make 60,097 acres of nominated parcels of NFS lands available for geothermal leasing by the BLM.” *DEA, p. 4.*

The MBSNF is engaged in segmentation. That is, the MBSNF is taking a narrow review of its initial decision and concluding that it would have no significant adverse environmental impact and that any environmental impact analysis would be conducted later by BLM. However, without this initial MBSNF step, the “project” could not proceed.

By referring to a project, rather than a mere “administrative analysis,” the MBSNF should prepare an EIS in order to more fully examine alternatives and understand impacts on the MBSNF from such an extensive proposed project (60,097 acres). In addition, it is highly likely that the BLM would continue to segment this process by issuing a finding of no-significant adverse impact for each particular lease, thereby allowing both the MBSNF and BLM to avoid any cumulative impact analysis. **Therefore, a MBSNF EIS should be required.**

TRANSMISSION LINES

A search of the DEA discloses only a single reference to transmission lines under activities: “Access roads; drill site development, install wellfield equipment, construct a power plant, install electric transmission lines; reclamation.” *DEA, Table 2, page 11.* However, transmission lines can have significant adverse environmental impacts. It appears that the MBSNF has chosen to

approve 60,097 acres for geothermal leasing without any consideration or review of transmission line impacts.

RIVERS AND STREAMS

In addition, the DEA fails to identify individual rivers or streams or mention impacts to rivers or streams, other than designated wild, scenic, or recreational rivers.

ESA

It is concerning that the USFS has determined that “consenting to lease the nominated parcels will have no effect on ESA-listed species or designated critical habitat in the action area. Because the ‘no effect’ standard under Section 7(a)(2) is met, consultation with the U.S. Fish and Wildlife Service or NOAA Fisheries is not required.” DEA, page 14. The WUM strongly objects to this blanket determination and requests that Section 7(a)(2) consultation be carried out.

PREVIOUS GEOTHERMAL LEASING

The DEA cover page states: “A 2018 temperature gradient well drilled in the Mt. Baker area.” The DEA, page 13, states: “The BLM awarded a lease for the lands determined to be administratively available in 2015. A single temperature gradient well was drilled but has since been plugged and abandoned.”

What does “Mt. Baker area” mean. Was this on MBSNF land? Where was the gradient well located? Where is the data from this drilling? How does that data compare with data from profiles potentially supporting geothermal development?

MONITORING

The DEA refers at several places to monitoring requirements. How will any such monitoring reports be made available to the public?

MITIGATION

The DEA refers at several places to mitigation or mitigation measures. How will any such mitigation or mitigation measure reports be made available to the public?

Appendix C – Stipulations.

The *Wildlife* section states the following:

“The following stipulation is designed to protect ESA-Listed Endangered Species and their habitat, as seen in guidance from the LRMP p. 4-124 and in the Endangered Species Act of 1973 (as amended).” DEA, page 38.

This is found only in the “Wildlife” section, but not in the *Fisheries and Hydraulics* section (DEA, page 34). This should be clarified to note that the ESA stipulation also applies to Fisheries.

SUMMARY

We also support and incorporate, by reference, the DEA comments submitted May 14, 2026, by Bill Lidel, P.E. In conclusion, the WUM requests that the MBSNF prepare an EIS on its proposed geothermal leasing “project.” Please provide a copy of your EA decision. Thank you.

/s/ G.M. Zemansky, Ph.D., PG Emeritus, CGWP
President
Wise Use Movement