



**National Headquarters**

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David Farmer  
Acting Forest Supervisor  
Okanogan-Wenatchee National Forest  
215 Melody Lane  
Wenatchee, WA 98801

Submitted Electronically

August 27, 2026

Re: Defenders of Wildlife Comments on I-90 Snoqualmie Pass East-Public Safety/Wildlife Closure Area Draft Environmental Assessment (Project #349472)

Dear Mr. Farmer,

On behalf of Defenders of Wildlife (“Defenders”) and our more than two million members and supporters, including 50,000 in Washington, we submit the following comments regarding the I-90 Snoqualmie Pass East – Public Safety/Wildlife Closure Area draft Environmental Assessment (“EA”). Defenders is a nationwide nonprofit organization dedicated to protecting and restoring America’s wildlife at risk of extinction. We envision a future in which wildlife thrives, sustained by broad public support and a resilient network of healthy lands and waters. We thank you for the opportunity to provide comments on the draft EA.

Defenders is very supportive of infrastructure projects across the country that connect intact blocks of habitat and improve the ability of wildlife to safely move across the landscape. Although we have not been directly involved in the I-90 Snoqualmie Pass project, Defenders’ Northwest Field Conservation Program has celebrated your accomplishments and those of your partners while frequently referencing the project’s success as a model for other projects to emulate.

We write today in support of the proposed closure order as outlined in the I-90 Snoqualmie Pass East (“SPE”) – Public Safety/Wildlife Closure Area draft EA and offer the following comments for your consideration. The “Alternatives Considered But Not Analyzed in Detail” section considered, but rejected, a ½-mile closure on either side of the interstate to prevent human use of the wildlife crossing structures because of “impacts on open roads and trails and the Yakima River.” (EA at 6) The EA did leave open the possibility of reassessing the closure size as researchers gather more information from long-term wildlife monitoring. (*Id.*)

We are encouraged to see Ecological Objectives examining the effects of human activity on crossing structure use already present in the I-90 SPE Ecological Connectivity Monitoring Plan 2019–2029 (“SPE Monitoring Plan”) (see Tables 7-2 & 7-3 and Appendix D, page D-4), and a commitment to a “lessons-learned, adaptive management approach.” (SPE Monitoring Plan at 1). The SPE Monitoring Plan also includes an “Adaptive Management Implementation” section that mentions how monitoring “helped to adaptively manage the planning and design” in future phases, specifically by identifying critical features needed for pika to use the structures (SPE Monitoring Plan at 59). That said, neither the SPE Monitoring Plan nor the draft EA specifies how a reassessment of the closure area would occur.

We recommend including more information on how a reassessment of the closure size would occur and encourage you to consider expanding the 1,000-foot proposed buffer in specific areas – such as in the vicinity of the crossing structures – to encourage additional wildlife movement. Doing so would align with your acknowledgment in the EA that the “proposed closure area may be too small,” (EA at 6) and your recognition that “activity patterns of wildlife at crossing structures should be similar to those in areas characterized by little or no human disturbance” (SPE Monitoring Plan at 41). By way of suggestion, perhaps you could expand the buffer past 1,000 feet for a period of time at one crossing, to see if monitoring reveals increased species use. Overall, we commend your commitment to adaptively managing the closure area and believe it is the best way to ensure the continued success of the project area.

Thank you for the opportunity to comment and for providing proof of concept for other projects to emulate in the Northwest.

Sincerely,

A handwritten signature in black ink, appearing to read 'Colin Reynolds', with a stylized, cursive script.

Colin Reynolds

Senior Advisor, Northwest Program  
Defenders of Wildlife