

Data Submitted (UTC 11): 5/3/2024 6:42:08 AM

First name: Roger

Last name: Presentin

Organization:

Title:

Comments: I am objecting to the proposals by private outfitters to locate winter huts at two locations in the Mount Baker Snoqualmie National Forest; the areas referred to as Heliotrope Ridge trailhead and Anderson-Watson Lakes trailhead. Two other locations are referenced under this action, Twin Sisters range and Forest Road 3160. I support the proposed hut on Forest Road 3160 as this is provided by volunteers and open to non-fee public use, therefore of significant benefit to the recreating public. I cannot comment on the Twin Sisters range proposal at this time, as access is currently blocked by private landowners to public lands adjacent to the site of this proposed hut.

In addition, I note that the proposed process of evaluation of the aforementioned proposals is inadequate under NEPA, and reliance on a letter of decision compromises transparency of the process.

To be clear, I endorse that use of public recreational resources must be managed to support a variety of users and uses. This effort becomes more complicated, requiring of careful analysis, as the number (and type) of prospective users increase. This may also include considering allowance for users that otherwise may have access challenges, either physical or financial. Effective management often requires tradeoffs and well thought out decisions, supported by input from the public and prospective users.

I see that the notice provided that evaluation of this activity will be considered under a categorical exclusion, which involves an abbreviated NEPA process as compared to an Environmental Analysis or EIS. This is of considerable concern, as a CX may not adequately inform the decision by limiting information collection and only provides a limited, inadequate opportunity for public input. In addition, it is not clear that a CX is applicable since this would not be eligible as allowed by example in title-36/chapter-II/part-220/section-220.6, since the 2 proposals by guide companies are not strictly new recreational uses but are in fact new commercial uses at these locations.

Considering that these are new commercial use proposals, it is informative for resource management decisionmakers to consider comparison to existing recreational use. For example, on many public lands local winter activity clubs, for example ski and snowmobile clubs, have provided warming huts for convenience and safety of users, without restriction of users (as noted above). In comparison, these commercial enterprises would, understandably, restrict access and use of their facilities to paying clients only. Also, public entities (such as Washington State) collect user fees as part of licensing and snow park permit fees to support grooming of trails and facilitating clearing of parking areas. The commercial enterprise described would likely present a non-proportional (excess) burden on the resource without an increase in available license and permit fee funding for financial support (the commercial enterprises demonstrate clear examples of the well-referenced 'free riders').

In conclusion, I recommend rejection of the commercial proposals as not in alignment with the existing recreational use. The commercial activity increases the user burden without avenue to provide additional funding to address impacts of additional users. The commercial proposal benefits a select few at the expense of the wider public (prompting the refrain, are our public lands for sale?) And, at the very least, the proposals by their commercial nature prompts more extensive evaluation than can be adequately addressed by a CX.

I recognize the increase of potential recreational use and users promotes complexity in the decision process.

NEPA is a process to consider impacts to the natural environment, and efforts should favor more complete analysis and public input. Resource Management in general considers a broad spectrum of potential uses/users; however, in evaluating uses for public lands, favor should be given to recreational over commercial use.

I appreciate the opportunity to comment, please include me on the email list for future documents and proceedings.