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Comments: USDA Forest Service

Attn: 1570/1950 Objections

1220 SW 3rd Ave

Portland, OR 97204

Re: OBJECTION to the Carbon River Landscape Analysis (CARLA) Project #65083 - Impacts to Motorized Recreation at Evans Creek OHV Area

Dear Reviewing Officer,

Please accept this letter as the formal Objection by members of the Off-Highway Vehicle (OHV) recreation community regarding the Draft Decision and Final Environmental Assessment (EA) for the above-referenced project. The Responsible Official for this Project is Erin Uloth, Mt. Baker-Snoqualmie Forest Supervisor.

Except as stated within this Objection Letter, we restate and incorporate by reference all comments previously submitted during scoping and comment periods, including specific objections raised by OHV recreation groups and individuals regarding the Evans Creek Off-Highway Vehicle Area.

The Evans Creek OHV area is the only designated OHV system within the Mt. Baker-Snoqualmie National Forest, making it a unique and irreplaceable recreation resource. Proposed changes in the CARLA Project-particularly the conversion of 13.17 miles of existing OHV trails into Level 1 administrative roads-represent a disproportionate impact on the OHV community, with long-term and potentially permanent consequences for recreation access.

Importantly, access to OHV trails is also a critical means of outdoor recreation for individuals with disabilities, who may be unable to explore the forest through non-motorized means. OHV routes provide one of the only viable ways for disabled users to experience the backcountry, including scenic areas and natural features that would otherwise be inaccessible. Limiting motorized access at Evans Creek effectively removes opportunities for equitable recreation, excluding a segment of the public that is already underserved. This is inconsistent with federal goals of ensuring access for all Americans, including under the Architectural Barriers Act, Rehabilitation Act, and Americans with Disabilities Act (ADA).

Accordingly, we raise the following objections:

1. Conversion of OHV Trails to Level 1 Roads Without Adequate Public Notice

After the comment period, the Project EA introduced proposals converting motorized trails into administrative-use-only roads. Regarding late-added amendments, these road conversions represent a new issue not adequately disclosed during initial scoping, leaving OHV stakeholders without a meaningful opportunity to comment.

OHV users who rely on Evans Creek for access and recreation were not separately notified of the change in designation, despite the fact it substantially alters access to the only OHV-designated area on the forest.

Failure to flag this change at the scoping stage prevented broader engagement from the recreation community, who will be disproportionately affected by trail losses.

We request the Forest Service provide full public notice and a new opportunity for comment on all changes directly impacting Evans Creek OHV area trail mileage, trail-to-road conversions, and recreation opportunity shifts.

## 2. Permanent Loss of OHV Trail Mileage

The Draft Decision Notice states that 13.17 miles (roughly 65%) of OHV routes would be reclassified as Level 1 administrative roads.

Level 1 roads are closed to the public, with access restricted to administrative use. By definition, this constitutes a permanent removal of designated OHV trail opportunities.

The EA downplays the long-term impact by emphasizing administrative "custodial care," without acknowledging this translates directly into a net loss of trail mileage open for recreation.

As written, this violates the Northwest Forest Plan requirement for maintaining diverse recreation opportunities across the Recreation Opportunity Spectrum (ROS). Reducing Evans Creek trail mileage directly shifts the ROS from Semi-Primitive Motorized to Roaded Natural, degrading the user experience.

This also disproportionately affects disabled individuals who rely on motorized means to access dispersed recreation.

We request revision of the EA and Draft Decision to ensure that converted trails are restored for OHV use post-project or that equivalent replacement mileage and opportunities are created in the same region.

## 3. Misrepresentation of Recreation Impacts (ROS and User Experience)

The EA fails to fully disclose how OHV recreation will be altered:

Trail-to-road conversion diminishes terrain variety and eliminates natural challenge elements, replacing them with managed, "road-like" experiences.

The EA characterizes OHV access as "maintained," when in fact the proper description is reduced, restricted, and permanently modified.

The elimination of technical trail features and scenic access severely impacts users with mobility limitations, who depend on motorized trails to experience meaningful outdoor recreation.

We request the EA be revised to include a complete section on ROS impacts specific to Evans Creek, with direct acknowledgement that technical trail features and semi-primitive recreation conditions will be lost under Alternative 1.

## 4. Monitoring and Adaptive Management

The Draft Decision's Monitoring Plan is incomplete. For OHV use, this is particularly critical given the 30-year duration of the project:

Recreation users must be afforded a clear monitoring plan that tracks mileage losses, ROS classification changes, and accessibility outcomes.

Adaptive management should include commitment to reopen converted trails, restore challenge elements, or plan equivalent replacements if recreation conditions are not maintained.

Monitoring should also include accessibility metrics to ensure that the needs of disabled users continue to be met throughout the project's lifespan.

## 5. Stakeholder Engagement

The EA asserts general compliance with forest-wide recreation goals but fails to demonstrate meaningful engagement with OHV-specific user groups during the decision-making process.

The Pacific Northwest 4-Wheel Drive Association, local OHV clubs, and other recreation advocates have consistently requested formal inclusion in planning and alternative development.

Engagement after decisions are effectively made does not meet the intent or requirements of NEPA.

At no point were disability advocacy or accessible recreation stakeholders consulted, despite the implications for inclusive access.

We request that OHV stakeholders are directly involved in any revisions, pre-haul planning, and long-term recreation management planning.

## Conclusion

Our objection centers on the lack of procedural transparency and the inadequacy of the EA in describing the true scale of impact. The Evans Creek OHV area is unique and irreplaceable-losing 13.17 miles of trails here means the OHV community loses opportunities that cannot be replicated elsewhere in the forest.

Moreover, the removal of OHV access from Evans Creek OHV Area strips away critical recreation opportunities for individuals with disabilities, many of whom depend on motorized access to experience public lands. This is not simply a user group preference-it is an accessibility and equity issue that deserves full consideration under applicable federal laws and policies.

We respectfully request:

That all Evans Creek OHV trails be retained as OHV-use trails following temporary timber haul, not reclassified into Level 1 roads.

That the EA and Decision Notice be revised to accurately reflect long-term recreation consequences for motorized users, including those with disabilities.

That OHV recreation stakeholders be formally included in developing any future revisions, monitoring plans, or project-level implementation affecting Evans Creek.

We appreciate the opportunity to comment and request to remain on the mailing list for all future communications and follow-up.

Respectfully submitted,  
Malachi Lones