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Comments: Forestwide Thinning Project

Mt. Baker-Snoqualmie National Forest

I am a lawful motorized outdoor recreationist who relies on designated Forest Service roads and routes, as identified on the applicable Motor Vehicle Use Maps (MVUMs), to access and recreate within the Mt. Baker-Snoqualmie National Forest. I submit these comments for inclusion in the administrative record regarding the proposed Forestwide Thinning Project.

While I acknowledge the Forest Service's authority to conduct vegetation management and fuels reduction, the Environmental Assessment (EA) does not meet the procedural requirements of the National Environmental Policy Act (NEPA) with respect to disclosure, cumulative impact analysis, and the consideration of motorized recreation access over the proposed 30-year authorization period.

1. Failure to Provide Adequate Disclosure of Reasonably Foreseeable Implementation

NEPA requires agencies to take a "hard look" at the environmental consequences of their actions and to provide sufficient detail to allow for meaningful public participation. An EA must disclose not only what actions could occur, but where actions are reasonably foreseeable to occur.

By authorizing thinning, road activity, and access restrictions forest-wide under a single decision, without clearly identifying the locations where implementation is likely, the EA lacks the spatial specificity necessary for informed review. The absence of clear maps or identification of affected road and route systems prevents lawful motorized users from understanding how their access may be impacted.

This broad, programmatic authorization improperly defers site-specific impact analysis to future implementation stages, limiting the public's ability to comment meaningfully and undermining NEPA's disclosure and transparency requirements.

2. Inadequate Analysis of Cumulative Impacts to Motorized Access

The EA fails to adequately analyze the cumulative impacts of repeated temporary closures, wildlife restrictions, safety closures, and road decommissioning on lawful motorized recreation access over the full 30-year life of the project.

NEPA requires analysis of cumulative impacts resulting from incremental actions when added to past, present, and reasonably foreseeable future actions. While individual closures may be described as temporary, repeated closures in the same areas over decades can functionally result in long-term or permanent loss of access.

The EA's treatment of recreation impacts as temporary does not reflect the real-world experience of lawful motorized users, whose access depends entirely on the availability of designated roads and routes. This failure understates the severity and duration of access impacts and does not satisfy NEPA's cumulative impact requirements.

3. Failure to Analyze Motorized Recreation as a Distinct and Disproportionately Affected User Group

Motorized recreation is not analyzed as a distinct user group, despite being uniquely and disproportionately affected by road and route closures. Roads are not incidental amenities for motorized recreation—they are the access itself.

When roads are closed or decommissioned, lawful motorized access is eliminated, not merely displaced or inconvenienced. By failing to distinguish motorized recreation from other recreational uses, the EA masks the true magnitude of access impacts and prevents a reasoned evaluation of alternatives or mitigation measures.

4. Improper Deferral of Road Closure and Decommissioning Decisions

The EA does not include enforceable commitments to reopen roads and routes following project completion. Without clear standards, timelines, or criteria for reopening, temporary closures risk becoming de facto permanent closures.

Deferring these decisions to future implementation without additional site-specific NEPA review constitutes improper segmentation and deferral of reasonably foreseeable impacts. NEPA does not allow agencies to postpone analysis of known impacts while relying on a broad programmatic approval.

Requested Actions

To comply with NEPA and ensure informed, transparent decision-making, I respectfully request that the Forest Service:

Clearly identify where project implementation is reasonably foreseeable, including specific roads, routes, and access corridors likely to be affected;

Fully analyze the cumulative impacts to lawful motorized recreation access over the entire 30-year duration of the project;

Analyze motorized recreation as a distinct and disproportionately affected user group; and

Include enforceable commitments to reopen roads and routes following project activities, unless permanent closure is supported by separate, site-specific NEPA analysis and decision-making.

Addressing these issues is necessary to satisfy NEPA's "hard look" requirement, support meaningful public participation, and ensure lawful motorized recreation access is fairly considered in long-term forest management decisions.

Thank you for the opportunity to submit these comments for inclusion in the administrative record.