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Comments: Thank you for the opportunity to comment on the Draft Environmental Assessment for the 2025 Mt. Baker Geothermal Consent to Lease. I appreciate the Forest Service's effort to distinguish this leasing decision from later ground-disturbing activity. I also recognize the value of reviewing domestic energy resources through a transparent and orderly public process.

My comments focus on decision clarity, resource protection, intergovernmental coordination, and future site-specific review. I am not asking the Forest Service to reject geothermal energy as a resource. I am asking that any consent-to-lease decision clearly define the scope of the current action, preserve the Forest Service's future discretion, and identify the review required before any later surface-disturbing proposal.

The project page states that this analysis does not authorize ground disturbance. That is an important distinction. But leasing is still a federal action with future administrative consequences. Once lease rights exist, later proposals may be reviewed within the framework created by the lease terms. The final EA and any decision notice should therefore state plainly what the Forest Service is authorizing now, what it is not authorizing now, and what future approvals would be required before any physical work occurs.

Comparable federal geothermal leasing records show why this clarity matters. The 2008 BLM/Forest Service geothermal leasing framework treats lease stipulations as enforceable terms used to protect other resource values. It also recognizes No Surface Occupancy as an appropriate major constraint where lesser measures are not enough. The Skykomish geothermal lease materials on the Mt. Baker-Snoqualmie National Forest used mapped stipulations, including No Surface Occupancy, to guide leasing. The 2025 BLM-Forest Service geothermal memorandum of understanding also confirms that the Forest Service's consent decision is the point at which the agency decides whether, and under what stipulations, National Forest System lands may be leased. The final EA should use that same clear structure here.

I respectfully request that the final EA and decision notice state that consent to lease does not authorize exploration drilling, production drilling, road construction, road reconstruction, vegetation clearing, water withdrawal, water discharge, pipeline construction, utility corridors, transmission facilities, staging areas, well pads, power generation facilities, or any other ground-disturbing activity.

I also request that the final EA state that any future proposal involving exploration drilling, road work, water use, geothermal production, utility connection, transmission, or other surface disturbance will require its own site-specific environmental review and public process before approval.

The Mt. Baker area includes important watershed, recreation, fish, wildlife, cultural, scenic, and local-government interests. It also presents access and emergency-response constraints. The final EA should recognize these interests as practical resource and operations issues that may affect downstream communities, Tribal governments, public agencies, recreation users, utilities, emergency responders, and residents.

My first request is for clear, enforceable lease stipulations. If leases are allowed, the final decision should identify which lands are closed to leasing, which lands are subject to No Surface Occupancy, and which lands are subject to other protective stipulations. These categories should be mapped and explained in plain language.

The final EA should also explain whether any No Surface Occupancy, controlled surface use, timing limitation, or other stipulation may be waived, excepted, or modified later. If so, the final decision should identify who may approve the change, what findings must be made, whether public notice is required, and whether additional NEPA review would occur before any waiver or exception.

My second request is for additional clarity on water resources. Future geothermal exploration or development could involve water withdrawal, drilling fluids, drilling muds, sediment control, stormwater management, groundwater effects, spill prevention, and waste handling. Even if the lease decision does not authorize these activities, the final EA should identify them as reasonably foreseeable issues that must be reviewed before any ground-disturbing proposal is approved.

The final EA should state that no water withdrawal, stream diversion, groundwater use, discharge, or drilling-fluid management activity is authorized by the lease decision. It should also state that any future proposal must

comply with all applicable federal, state, Tribal, and local water-resource requirements before approval.

My third request is for a clear treatment of Tribal consultation and cultural resources. The Mt. Baker landscape has cultural significance that may not be captured by a narrow archaeological-site review. The final EA should explain how government-to-government consultation has informed the leasing decision and how Tribal treaty, cultural, fishery, and landscape concerns will be addressed before any ground-disturbing activity.

The final EA should also clarify which Tribal and cultural-resource issues are addressed at the leasing stage and which would require additional review before later surface-disturbing approval. This would help the public understand how the current decision relates to later project-level review.

My fourth request is for a fuller explanation of reasonably foreseeable future activities. A geothermal lease by itself may not authorize construction. But geothermal exploration and development can require roads, well pads, drilling rigs, water handling, hazardous-materials management, pipelines, utility interconnection, transmission capacity, and long-term access. The final EA should identify these categories of future activity and explain which ones would require later site-specific review.

The Forest Service need not approve or deny a future project now. But the public should be able to understand the sequence of decisions: lease first, possible exploration proposal next, possible development proposal later, with separate review and decision points at each stage.

My fifth request is for coordination with local and regional public agencies. Before any future ground-disturbing proposal is considered, the Forest Service should coordinate with affected Tribes, the Bureau of Land Management, Washington Department of Ecology, Washington Department of Natural Resources, Washington Department of Fish and Wildlife, Skagit County, Whatcom County, local emergency-response agencies, salmon-recovery entities, utilities, and affected local governments.

This coordination should address practical questions: emergency access, winter access, road capacity, wildfire risk, spill response, traffic, staging, communications, evacuation constraints, and responsibility for public costs. These local-government and operations issues should be addressed before a site-specific proposal reaches final decision.

My sixth request is for attention to recreation and local economic effects. The Mt. Baker area supports outdoor recreation, tourism, public access, and local identity for communities on both sides of the county line. The final EA should explain how lease stipulations protect recreation sites, trails, scenic values, access routes, and the public's experience of the area. If later exploration or development could affect recreation access or scenic resources, those impacts should be identified as issues for future site-specific analysis.

My seventh request is for a clear cumulative-effects framework. The area is already affected by recreation use, hydropower infrastructure, roads, fish and watershed recovery needs, changing environmental conditions, and public-land management demands. The final EA should explain how geothermal leasing would fit within that existing landscape of cumulative effects. This analysis is important because the lease decision is limited in scope, while future proposals may occur over many years.

My eighth request is for plain-language public transparency. The final EA and decision notice should explain:

What consent to lease authorizes;

What consent to lease does not authorize;

What lease stipulations apply;

Whether stipulations can be waived or modified;

What future proposals would require additional NEPA review;

What role the public, Tribes, state agencies, and local governments have in later decisions.

This clarity would support a more orderly administrative process and help the public understand the limits of the current decision.

Taken together, I respectfully request that the Forest Service clearly define the scope and effect of any leasing-stage decision. If the Forest Service consents to leasing, the final decision should preserve future agency discretion, include enforceable stipulations, address watershed and cultural resources, require site-specific review before any physical activity, and explain each future decision point.

Thank you for considering these comments and for your work on this matter.