

Nichol Phillips
Pacific Northwest 4-Wheel Drive Association
nicholphillips@comcast.net
253-377-8240
Date: 12-13-2025



Re: Comments on the Forestwide Thinning Environmental Assessment

Mt. Baker–Snoqualmie National Forest
Pacific Northwest Region, USDA Forest Service

These comments are submitted regarding the Forestwide Thinning Environmental Assessment (EA) for the Mt. Baker–Snoqualmie National Forest. I submit these comments to ensure they are included in the administrative record and preserved for any future objection or judicial review.

While I do not oppose forest restoration or thinning in principle, the EA fails to adequately disclose and analyze foreseeable impacts to recreation access—particularly motorized recreation—resulting from repeated closures, road decommissioning, and access restrictions over the 30-year implementation period.

The Potential Implementation Areas Map Contradicts the EA's Assertions

The EA repeatedly states that implementation locations are unknown and that recreation impacts are therefore speculative and temporary. However, the Forest Service's own Potential Implementation Areas map directly contradicts this assertion.

The map clearly identifies:

- Large, contiguous clusters of eligible treatment areas
- Concentration along existing road networks
- Overlap with well-established recreation corridors

Because these locations are now identified, impacts to recreation access are reasonably foreseeable and must be analyzed under NEPA (40 CFR §1508.1(g)).

Failure to Analyze Motorized Recreation as a Distinct Use

The EA does not analyze motorized recreation as a distinct resource category, despite the fact that:

- Motorized recreation depends on roads and routes directly affected by thinning operations
- Temporary and permanent road closures disproportionately affect motorized users
- Road decommissioning permanently eliminates recreation opportunity

The Recreation Report acknowledges incomplete data for dispersed recreation but nonetheless concludes impacts are insignificant. Lack of data does not justify dismissal of impacts under NEPA.

Cumulative Effects to Recreation Access Are Not Analyzed

The EA fails to analyze the cumulative effects of:

- Thinning operations
- Fuels treatment closures
- Wildlife-related access restrictions
- Haul safety closures
- Road reconstruction and decommissioning

These closures are analyzed independently, but their combined and repeated effect on access within the same corridors over a 30-year period is never evaluated.

Serial “temporary” closures across the same landscapes constitute functional long-term access loss, which the EA fails to disclose.

Wildlife Mitigation Measures Conflict with Recreation Access

The Wildlife Report relies heavily on:

- Seasonal closures
- Reduced road density
- Limiting public access
- Road decommissioning

These measures directly conflict with recreation access, yet the EA does not analyze this tradeoff or disclose how recreation opportunity will be affected long-term.

Requested Actions

To comply with NEPA, the Forest Service must:

1. Revise the EA to include spatially explicit recreation access analysis using the Potential Implementation Areas map
2. Analyze motorized recreation as a distinct resource use
3. Conduct a corridor-level cumulative effects analysis for access loss
4. Disclose anticipated duration and frequency of closures
5. Establish commitments for post-implementation reopening of routes

The EA does not take the required “hard look” at foreseeable recreation impacts and therefore cannot support a Finding of No Significant Impact. These deficiencies must be corrected prior to any decision.

Respectfully submitted,

Nichol Phillips

Washington State Director

[Pacific Northwest 4-Wheel Drive Association](#)