



May 26, 2016

Via email to: comments-pacificnorthwest-mtbaker-snoqualmie-snoqualmie@fs.fed.us

Martie Schramm, District Ranger
Snoqualmie Ranger District
902 SE North Bend Way
North Bend, WA 98045

In Reply to: Greenwater ATM

Dear Ms. Schramm:

On behalf of its members, the American Forest Resource Council (AFRC) submits the following scoping comments on the proposed Greenwater ATM Project.

AFRC represents the forest products industry throughout Oregon, Washington, Idaho, Montana, and California. AFRC's members include over 50 forest product businesses and forest landowners. AFRC's mission is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. Many of our members have their operations in communities adjacent to the Mount Baker-Snoqualmie NF (MBSNF), and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The forest products sector in Washington State provides around 40,000 direct and about 100,000 indirect jobs. Many of these are found in rural communities, such as those adjacent to MBSNF. Wages paid, income taxes, and other monetary transactions generated by these businesses and family-wage jobs substantially contribute to the infrastructure and well-being of the local communities.

AFRC generally supports Alternative 3, as it appears this alternative maintains the greatest number of miles of road for open access. While neither action alternative is preferred because they would not maximize an open and well maintained transportation system benefiting a range of stakeholders, Alternative 3 appears to best balance resources challenges faced by the MBSNF with maintaining access.

Maintenance costs:

AFRC would like to understand more about the cost estimates used to develop the figures presented in Section 3.6.1.1 and Table 29. It appears the Forest is suggesting that every mile of road would be maintained every year at these levels if funding was provided. In Washington,

924 Capitol Way South, Suite 103, Olympia, Washington 98501

(360) 352-3910 • Fax (360) 352-3917

where arguably the most stringent forest practice regulations exist in the country, most large forestland owners conduct road maintenance on a rotating schedule. Not every mile of road is worked on each year. Depending on classification and use of the road, that rotation schedule may vary from less than a year to greater than two years. Also the types of maintenance activities will vary with items like grading more frequently and brushing and ditch cleaning less frequently in general. AFRC would like to know if the numbers presented in Table 29 reflect the actual annual needs for each mile of road, or if the number would vary if roads were placed on a rotating maintenance schedule. Also how this may impact the budget needs of the forest to maintain the maximum number of open roads.

Economic impacts and rural economies:

We are concerned with the way economic impacts in Section 3.15 are characterized and presented. Reliance on one source of research can lead to potentially incorrect or skewed results. For example, AFRC reviewed the Washington State Department of Employment Security data for King County in 2016.¹ For sectors most typically associated with recreation and leisure (retail - Gas Stations, Sporting Goods, Food/Beverage Stores, Recreation, Accommodations/Food Service) annual wages ranged from \$22,091 to \$30,652 per year. This is much different than the forestry and logging sectors which employ workers with wages ranging from \$36,024 to \$215,949 per year. This highlights the need to count not just jobs but how much economic impact the jobs create. How can one really know the economic impact of the project on local communities by simply counting jobs?

An op-ed published in the Salt Lake Tribune on August 1st, 2015² highlighted the potential for economic benefit from recreation to be over stated in rural communities. Authored by Paul Jakus, an economist in the Department of Applied Economics at Utah State University, the article explains the realities of where dollars are typically spent by the recreating public. After describing the statistics of the economic engine of recreation in Utah he goes on to state: *“But these numbers hide an important dichotomy: many, if not most, trip-related expenditures do not occur in the places people actually recreate.”* Mr. Jakus further describes a recent trip he took. *“For an eight-day vacation we spent less than \$300 on the road. Gasoline accounted for over half of our expenditures, but the local benefit of gasoline purchases is so small that the Bureau of Economic Analysis recommends that only 18 percent of expenditures be used to measure local economic impacts because the remainder immediately flows out of county. In effect, the counties we visited actually saw us spend less than \$200.”* While this is an op-ed, it was written by an economist and describes what many rural communities in Washington experience. To broadly state large statewide spending on recreation may skew and obscure the actual economic benefits seen in the local rural communities. Not to mention this may paint an unrealistic picture of the social and economic health of rural communities.

The Forest states “In addition to outdoor recreation, Federal lands, including the Project Area, provide other ecosystem services that contribute to the local economy. Ecosystem services include

¹ <https://fortress.wa.gov/esd/employmentdata/docs/regional-reports/king-county-data-tables.xlsx>

² <http://www.sltrib.com/opinion/2786964-155/op-ed-recreation-on-public-lands-not>

aesthetic information, habitat and water quality. In Washington, water quality, habitat, and aesthetic beauty are estimated to be valued between \$115 billion and \$217 billion per year. (Earth Economics 2015).” As presented, this implies that in addition to economic contributions provided by outdoor recreation, that these other ecosystem services provide billions of dollars to the Washington economy. While we feel these are important aspects to Federal lands, there are no actual transactions which take place allowing these dollars to flow into the economy, especially on the annual basis implied. Therefore, to infer these are economic boosts to the region is flawed. They may be the basis to support economic engines provided by recreation and other sources but in and of themselves, without a transaction, no one receives economic benefit. Economic value requires a willing seller and buyer operating in an open market, neither of which apply to this situation. These services may provide important social and ecological values but until those are monetized, the true economic value does not exist. The very wide range of the value estimate casts further doubt on its reliability. If there is potential *upward* variation of \$100 billion, downward variation of the same magnitude is possible.

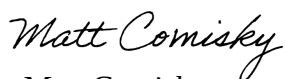
Decommissioned Roads:

We are concerned about the apparent intent to mark roads as decommissioned in the transportation system database prior to actual removal from the landscape. On page 19 of the EA it states; “*They would be put into a decommissioned category and removed from the road system, and eventually the landscape all together. Removal from the road system is a matter of updating the database of record. Removal from the landscape means obliterating the road and its prism, and restoring hydrologic function.*” Listing roads as decommissioned when they are functional would skew future road analysis in projects to be implemented in the area, and expose the Forest Service to legal challenges.

Additionally, private and state forestland owners in Washington are required to complete on-the-ground work for road abandonment (official term for removal from road system and database) and have that work approved by regulatory reviewers prior to official removal from GIS layers. Until this approval is granted, the landowner is responsible for maintenance to prevent resource damage. We would urge the Forest to retain these roads on the transportation database until required work for decommissioning is completed on the ground. This will assure the roads will not get “lost” from the database and assure the ecological restoration work associated with these roads are completed.

Thank you for the opportunity to comment on this project. We look forward to participating in the further development of this proposal. Should you have any questions regarding the above comments or would like additional information, please contact me at 360-352-3910 or mcomisky@amforest.org.

Sincerely,



Matt Comisky
Washington State Manager
American Forest Resource Council