

**From:** [Tom Partin](#)  
**To:** [FS-appeals-northern-regional-office](#)  
**Subject:** [External Email]Emerald Objection Comment Letter  
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Attached is AFRC's comment letter on the Emerald Project that we are submitting during the Objection period. As you will read, we want the Project to move forward, but we have concerns that the St. Joe District is missing big opportunities by not treating more acres when they develop an EA.

Thank you,

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**VIA Email: [appeals-northern-regional-office@usda.gov](mailto:appeals-northern-regional-office@usda.gov)**

February 23, 2021

Objection Reviewing Officer  
USDA Forest Service  
Northern Region  
26 Fort Missoula Road  
Missoula, MT 59804

Dear Reviewing Officer:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment during the Objection period on the Emerald Project.

AFRC is a regional trade association whose purpose 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 within and adjacent to the Idaho Panhandle National Forest and management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

AFRC is not writing to submit a formal objection, since the objection period is open, but rather to discuss some of our disappointments with the Project and the process of getting to this final Draft Decision Notice. AFRC wants to see the Project go forward but would like to open a dialogue with the District on some of the common themes we see coming out of the St. Joe District. We submitted comments during both the scoping period and the Draft EA comment period and most of those comments centered on asking the District to treat more acres within the Project area. We have submitted similar comments on the Homestead Project which is also on the St. Joe District.

The Emerald Project is a vegetation and hazardous fuels management project covering 21,627 acres located primarily within the Emerald Creek drainage. The District reduced the proposed acres to be treated using commercial logging from scoping (4,228 acres) down to the final commercial acreage of 2,518 acres. This is a reduction of 1,710 acres or 40% of the original scoping plan. Commercial treatments will now only be conducted on about 12% of the Project area.

AFRC submitted similar comments on the Homestead Project on the St. Joe Ranger District. In this Project, the District chose to only mechanically treat 7% of the project area. The Purpose and Need for both Projects were similar which AFRC supports—those were:

- Improvement of forest health and increased vegetation resilience through vegetation treatments including regeneration timber harvest with associated road construction and tree planting, individual tree removal operations within the Emerald Creek Campground.
- Fuel reduction treatments in and around the Wildland Urban Interface (WUI) and prescribed burning within harvest units.
- Roads management and watershed improvement.
- Contributing to local economies by providing forest products and employment.

The Key Points that we would like to make in this letter include:

1. The cost of doing an EA such as Emerald and Homestead is very high, and we continue to encourage the District to treat as many acres as possible under these analyses for economic, forest health, and other project purpose and need reasons.
2. AFRC does not believe our concerns about treating more acres commercially were adequately considered or addressed. In the section titled Public Involvement and Scoping the Forest stated *“This project was originally scoped to the public on September 28, 2018. At that time, the Forest Service proposed treating 4,329 acres in the project area. Members of the public expressed concern about the cumulative effects of prior and proposed land management activities including timber harvest, grazing, garnet mining, and road construction on resources in the project area. Many of those concerns are at least partially addressed by a reduction in proposed treatment acres that would lead to a reduction in the magnitude and extent of potential effects. Approximately 1,776 acres of previously proposed treatment were removed from the project since scoping.”*

No discussion or merit was given to AFRC’s request that more acres should be treated in the Project, nor was an alternative developed or such a proposal analyzed. We believe that the forest products industry is an important part of the Forest’s public, yet our input about developing an alternative which would treat more acres commercially and create more volume for the forest products industry was not considered.

3. AFRC provided specific reasoning in our scoping and Draft EA comments as to why harvesting a higher volume of timber is economically important. The National Forests in Idaho are very important for providing the raw materials that sawmills within the State

need to operate. The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Specifically, studies in Idaho have shown that 18 direct and indirect jobs are created for every one million board feet of timber harvested. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland.

AFRC has reviewed the work in the Economic Section of the Draft EA which states that *“A financial efficiency analysis showed that the proposed activities would result in viable timber sales that would provide about 63 million board feet of timber (125,810 CCF) with a present net value of about \$203,000. When accounting for all project activities both related to the timber sale and other restoration activities, the present net value of the project is about (\$39,000). The project is expected to create or maintain 59 jobs and \$5.4 million in labor income on an annual average basis.”* First, while AFRC very much appreciates that the Forest could generate as much as 63 mmbf from the Project, we believe the economic impacts could be understated if in fact 18 jobs are created per 1 mmbf of timber harvested. Second, with this positive economic analysis and yielding positive dollars above the restoration work that will be done— we feel more acres should have been treated to make the Project more economical.

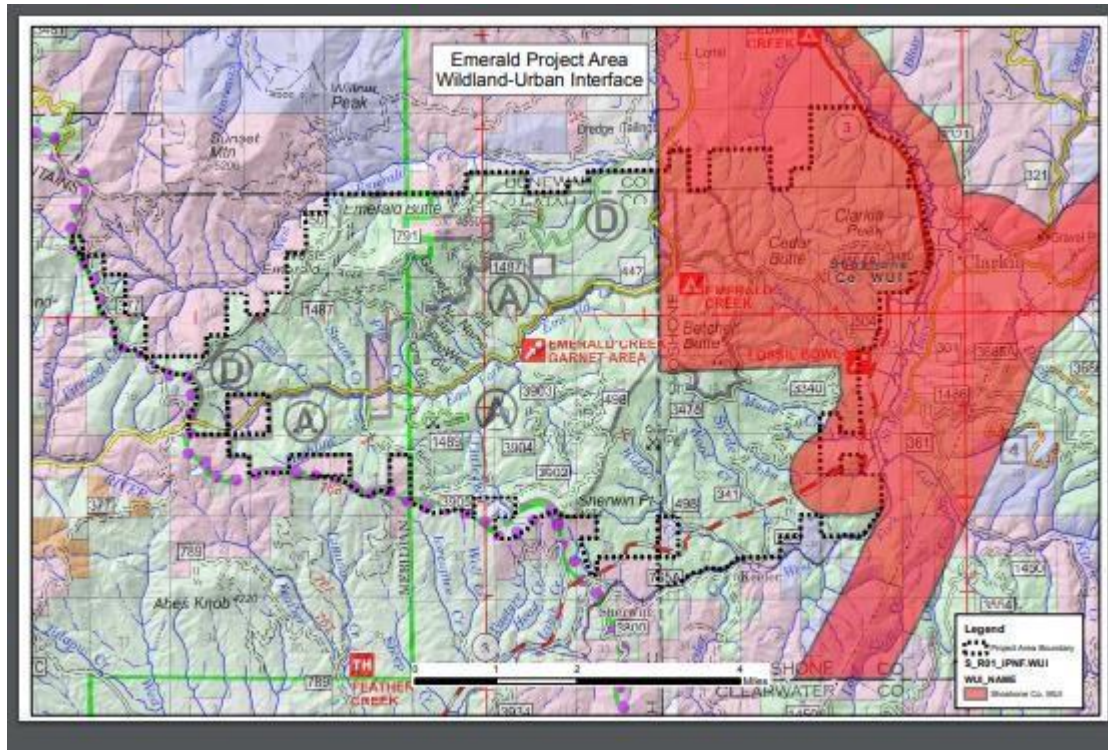
4. One Purpose and Need is to “Improve forest health and increase vegetation resilience through vegetation treatments.” AFRC does not believe this can be accomplished by only commercially treating 12% of the project area. Furthermore, you stated in the analysis that:

*“The Proposed Action would reduce, mitigate and slow the spread of insect damage and disease within stands. It has been determined that none of the effects of these actions would adversely impact the effects on forest composition, forest structure, or patch size caused by the Proposed Action.”*

If the above statement is accurate, and these treatments reduce, mitigate, and slow the spread of insect damage and disease and do not result in any adverse impacts on Forest resources, then why are treatment acres being reduced? AFRC believes there is a very questionable argument for reducing treatment acres when the above paragraph states there would be no adverse effects.

5. AFRC does not believe the District can meet the full intent of the Purpose and Need by treating so few acres in the WUI. In our Draft EA comments, we stated:

*“AFRC is concerned that an in-depth analysis of what treatments are needed within the WUI was deferred. The map below shows the Shoshone County WUI in red. This is a considerable amount of the WUI identified in the Project area on the west side of proposed treatment area. That includes several miles WUI boundaries that are within the Project boundary.”*



*AFRC feels the Forest should put treatment units that abut the WUI throughout the Project area and should thin the Forest to wide spacings leaving only 40 sq. ft. of basal area in those units. Another map in the supporting documents show the potential for crowning fires and this overlaps the WUI. AFRC also supports shaded fuel breaks along major roadways and believes this would be a good tool to use in the WUI. These fuel breaks could provide good safety for ingress and egress to the rural communities and residents found in the Project area.”*

6. Regarding the Roads issue we stated the following in our Draft EA comments:

*The Emerald road plan calls for placing approximately 8.4 miles of existing system roads into storage to improve water quality, wildlife habitat, and/or other resource values and decommissioning approximately 2.5 miles of existing system roads to improve water quality, wildlife habitat, and/or other resource values. AFRC believes that a significant factor contributing to increased fire activity in the region is the decreasing road access to our federal lands. This factor is often overshadowed by both climate change and fuels accumulation when the topic of wildfire is discussed in public*

*forums. However, we believe that a deteriorating road infrastructure has also significantly contributed to recent spikes in wildfires. This deterioration has been a result of both reduced funding for road maintenance and the federal agency's subsequent direction to reduce their overall road networks to align with this reduced funding. The outcome is a forested landscape that is increasingly inaccessible to fire suppression agencies due to road decommissioning and/or road abandonment. This inaccessibility complicates and delays the ability of firefighters to attack nascent fires quickly and directly. On the other hand, an intact and well-maintained road system would facilitate a scenario where firefighters can rapidly access fires and initiate direct attack in a more safe and effective manner.*

*If the Forest Service proposes to decommission, abandon or obliterate road segments from the Emerald Project area we would like to see the analysis consider potential adverse impacts to fire suppression efforts due to the reduced access caused by the reduction in the road network. We believe that this road network reduction would decrease access to wildland areas and hamper opportunities for firefighters to quickly respond and suppress fires. On the other hand, additional and improved roads will enable fire fighters quicker and safer access to suppress any fires that are ignited.*

*We would like the District to carefully consider the following three factors when making a decision to decommission any road in the project area:*

- Determination of any potential resource risk related to a road segment.*
- Determination of the access value provided by a road segment.*
- Determination of whether the resource risk outweighs the access value (for timber management and other resource needs).*

*We believe that only those road segments where resource risk outweighs access value should be considered for decommissioning.*

AFRC feels very strongly that the Forest complete a thorough analysis of roads to be placed in storage. We would like to have seen some further discussion in your Decision Notice about this issue and the importance of roads for fire access and other resources.

7. AFRC would like to go on record that we support creating openings larger than 40 acres. In the Draft EA, the Forest points out there is a need to regenerate portions or all of the stands of essentially pure Douglas-fir and grand fir due to the prevalence of root disease. Further as stated in the scoping document, "An intermediate harvest would exacerbate root disease effects (through buildup in the stumps and root systems of the pathogens that cause root disease), lead to heavy blowdown, and encourage advanced regeneration of grand fir and Douglas-fir." Regeneration harvest is also an integral component of a vegetation management program that strives to ensure a sustainable supply of timber products. AFRC supports a forest plan amendment requesting the use of openings larger than 40 acres.

These larger openings will also help to trend this area towards the vegetative desired conditions providing a mosaic of age classes. Hardwood, shrub, and grass species are important sources of high-quality forage for deer and elk as they prepare for winter, over winter, and in the spring as they begin to replenish lost body mass from the previous winter.

This proposal would retain and enhance aspen and provide valuable forage by reinvigorating existing shrub and grass communities making them more palatable and nutritious for big game species and other terrestrial wildlife. A good amount of documentation was included in the Draft EA regarding the need to enhance elk forage. The Forest has done a good job of utilizing regeneration harvests in the Project area, however AFRC believes more of these treatment acres should have been included.

To summarize our concerns on both the Emerald Project and the Homestead Projects, we are baffled why the District continues to commercially treat a small portion of the Project areas. The Emerald Project will yield significant volume (63 mmbf) and we are very appreciative of that volume and the jobs it will create. However, we feel the District has missed opportunities for attaining the purpose and need to a higher degree while also providing additional timber volume. We're concerned that more consideration seems to have been given to those voices that were asking to decrease the size of the Project rather than consider the request of AFRC and the forest products industry to do more.

AFRC has supported the District's Purpose and Need for both Projects, but we strongly feel those are not being met to the extent needed by treating so few acres. We must ask the question—*Is the District really improving forest health, reducing fuel loadings, and fully contributing to the local economies under this Decision?*

Thank you for the opportunity to provide comments during the Emerald Project Objection Period. I look forward to having follow-up discussions with the District and Forest regarding the issues we discussed above. I look forward to following the implementation of this Project as it moves forward.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom Partin". The signature is fluid and cursive, with a long horizontal stroke extending from the end.

Tom Partin  
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Portland, Oregon 97239