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Comments: RE: Environmental Assessment

Finney AMA Project

To all involved in finally generating a responsible management project in the 1994 designated Finney Adaptive Management Area, sincere congratulations.

Comments to the EA & alternatives:

I believe Alternative 2 should be the selected action alternative

- Because it is most congruent with the NWFP ROD statement of "provide opportunity for social and economic benefits to these areas (communities experiencing adverse impacts).
- The larger acreage treated will, as a by-product, produce more timber and take more time (raw material for wood industries and more wages)
- It also treats more acres to benefit spotted owls and marbled murrelets; an emphasis of the AMA.
- The stated cost/benefit ratio is greater than 1. The Multiple Use Sustained Yield Act states "not necessarily the combination of uses that will give the greatest dollar return". Alt 2A has a CB ratio slightly greater than Alt 2, but accomplishes less.

On a side note: this project is occurring in a log market measured in long log Scribner board feet scale. The measurement of NF timber in cubic feet cannot use area market data to accurately calculate timber volume prices and thus the CB ratio. Forecasts are for rising log prices over the next couple of years and should be referenced in the EA.

I am concerned that treatment areas were dropped rather than looking at cable yarding with full suspension over or through what are deemed "wet & riparian" areas. Part of the AMA rationale is "development and testing of new management approaches and techniques to meeting ecological objectives". There is no mention of a logging engineering qualified specialist in regards to the feasibility of yarding in this manner. WA DNR, where it is feasible, will plan skyline yarding across riparian areas to timber harvest areas.

This Environmental Justice/economic inputs area should also note the 25% of NF receipts that go to counties (Acts of May 23, 1908 & March 1, 1911) and that 10% of NF receipts go to roads & trails (Act of March 4, 1913).

The Act of March 4, 1913 is referenced in 2006 omnibus bill and has not, to my knowledge, been rescinded. "ten per centum of all moneys received from the national forests during each fiscal year shall be available at the end thereof, to be expended by the Secretary of Agriculture for the construction and maintenance of roads and trails within the national forest in the States from which such proceeds are derived".

Continued public road access on the MBS should have been a key issue. Revenue from this project could be used elsewhere to address road & trail maintenance. The Environmental Justice section should also address the direction for decommissioning roads to supposedly save road maintenance funds. MBS miles of road per acre is substantially less than other western national forests (I can send you a table if you do not have one). 10% of FS receipts to roads & trails is a big deal.

Non-key issues are defined as conjectural and not supported by scientific or factual evidence. Showing as an issue dense WH regeneration after thinning is by large measure ignoring the above definition and adding weight to what is an anthropocentric concern. I don't like wading through thick WH myself, but it is an entirely natural process anytime growing space is opened in a WH dominated stand. There are numerous mature WH & SF stands that grew from a beginning of very dense regeneration. Wind throw commonly produces dense WH regeneration as will wildfire where not all the canopy is killed. Wildlife will continue to use the same paths, thus they maintain travel ways as regeneration grows in height. The problem for humans is that the travel ways are shorter than we are. Regeneration thickets also provide good hiding cover. Elevating this to an issue is pandering to the uninformed or selectively educated. That said; the EA addresses the issue appropriately, though not completely.

Recreation (p 3-53) needs to note that road 1707 accesses Gee Point, the former lookout site, Gee Lake and

Little Gee Lake. Your roadless area map even shows the Gee Point trail. These are important and popular dispersed recreation areas. Little Gee Lake has fish and is an easy access for youth fishing. Consistency or importance in regards to the Presidential "America's Great Outdoors" initiative and getting kids outdoors should be noted as the project will maintain part of the access road system. No mention is made of effect of road decommissioning on dispersed camping.

Page 2-39 "Rare" plant mitigation. Species noted in some of the stands are survey and manage, not rare, and should be consistently noted as such. Also Eurasian blackberry is not noted as an invasive species; how is it categorized in R6? P 3-50: location of the plant unknown? How can you identify a plant and buffer it for protection, but somehow not know its specific location?

P 3-51: The discussion of past timber harvest impacts should be qualified to include past timber sale contract requirements for stream cleanout, PUM & YUM yarding and snag falling. Some of this was "best science" of the time and direction for utilization and fire prevention. Broadcast burning and planting 100% DF also contributed to conditions as noted elsewhere in EA.

Soils – P3-61: Overly dependent on models – no current measurements are cited. Past disturbance is lumped in with proposal disturbance; no compensation is made for soil recovery. Past yarding had large, heavy logs in it; the current proposal will yard small logs with substantially less impact.

P3-156: "removed"? Aren't temporary roads treated or restored?

P3-159: Economic inputs – analyst should look at where the mills are that would be utilizing the timber removed from stand treatments. Skagit & Snohomish Counties are where the mills are. Hauling costs will preclude logs going elsewhere. Suitable mills are SPI in Bayview, Hampton in Darrington and (unlikely due to haul) Seattle-Snohomish in Snohomish.

P1-9: Inventoried Roadless Areas – why do "roadless areas" have active FS system roads in them? (Higgins – 1891, Pressentin – portions of 1720). These are a legacy of RARE II and were released years ago. Why are roaded areas still being discussed or managed as "roadless areas".

Sincerely

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