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Organization: American Forest Resource Council
Title: Washington Manager
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Jennifer Eberlien
Forest Supervisor
Mt. Baker-Snoqualmie National Forest
2930 Wetmore Ave. Suite 3A
Everett, WA 98201

In Reply To: Finney AMA Project EA

Dear Ms. Eberlien:

The American Forest Resource Council (AFRC) is pleased to provide this information to be included in your planning of the proposed Finney AMA Project. AFRC represents over 60 forest product businesses and forest landowners in twelve western states. Our mission is to create a favorable operating environment for the forest products industry, ensure a reliable timber supply from public and private lands, and promote sustainable management of forests by improving federal laws, regulations, policies and decisions that determine or influence the management of all lands. Many of our members have their operations in communities adjacent to the Mt. Baker-Snoqualmie National Forest, and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves.

AFRC would like to see all timber sales be economically viable. Appropriate harvesting systems should be used on all units to achieve an economically viable sale and increase the revenues to the government. AFRC supports the Alternative 2 (Proposed Action) as it best meets the purpose and need and research components of the project. After AFRC made field visits to the project area, it appears that appropriate harvesting systems have been prescribed in the EA for the Action Alternative and should thus maximize revenue returned to the government. We encourage and support your use of temporary roads and spurs to access units for use of the most economical harvesting systems. Temporary roads can always be removed, or made inaccessible to vehicles after logging operations are completed. System roads (permanent roads) give the Forest Service greater access to the area for future fuel reduction treatments and improve the agency's ability to respond to wildfires. AFRC cannot support the decommissioning of any permanent roads that improve access for fuels reduction treatments and early initial response to wildfires. Getting into the habit of decommissioning permanent roads on a landscape that can be prone to catastrophic wildfires is careless and not beneficial to the continued health of the forest.

AFRC would like to voice support for the proposed creation of multiple small gap cuts in your typical thinning prescriptions and heavy thinning prescriptions in the Finney AMA Project. Larger gap cuts (3-5 acres in size) are especially important since they will create longer lasting early successional habitat for species such as Columbian black-tailed deer (Odocoileus hemionus columbianus) and Roosevelt Elk (Cervus elaphus roosevelti) that is not provided by typical thinning treatments. Thinning treatments do not provide the quantity or quality of forage that would be sufficient to sustain wild ungulate populations. The Northwest Forest Plan states that early successional habitat will be provided for these species on federal lands. Many of our members' employees are avid big game hunters and it is important to them that federal lands provide adequate habitat for those species.

Research has shown that nutritional resources are an important component to elk survival and successful

reproduction. In most cases, early seral habitat in western Washington landscapes is created by either harvesting practices and/or occasional wildland fires. A paper by Dr. Michael J. Wisdom and others in 2005 on the Starkey Experimental Forest showed that timber harvest is likely to cause a short-term decline in forage availability following harvest activities, but is followed by a large increase in forage that may last up to 10 or more years. They also stated that in many landscapes continuous harvest might be required to maintain forage production. It is important, in light of this new research, that elk habitat adequately incorporates the importance of nutritional needs and does not over emphasize the importance of thermal cover. We encourage the Mt. Baker-Snoqualmie National Forest to look for opportunities to improve big game habitat in land use allocations where it is possible.

Seasonal and wildlife restrictions often make timber sales extremely difficult to complete within the contract timelines. Fire season restrictions on top of seasonal and wildlife restrictions can often limit workdays to 4-5 hours. All these restrictions have a cost to the purchaser and results in a lower bid for the stumpage. AFRC would also like to continue to encourage the Mt. Baker-Snoqualmie National Forest to offer sales that will allow winter harvesting and haul. It appears that most of the haul routes for the Finney AMA Project are on rocked or paved surfaces. We are hopeful that many units will be free for winter operations. The loggers need winter work and the mills generally need winter wood, this is a big bidding issue for a purchaser.

We are pleased that the Forest Service will allow mechanical harvesting and pre-bunching of processed logs where possible (slopes <35%). New mechanical harvesting equipment has a very light footprint on the ground and thus minimizes detrimental soil effects. Use of this equipment will make all phases of the ground based and skyline logging considerably more economical and can also treat the slash at the same time.

AFRC also would like to voice support for thinning treatments in the riparian areas of the Finney AMA Project. By prescribing small no cut buffers (25-50 feet) to be left to maintain stream temperatures and thinning the remaining acres inside the riparian reserves you can achieve the management objectives of moving them into late seral habitat faster. By reducing the no cut buffers to 25-50 feet and thinning down to that distance, the forest also harvests more volume during the sale thus reducing unit cost. We encourage the Mt. Baker-Snoqualmie National Forest to silvicultural thinning treatments in riparian reserves on future projects to accelerate the development of desired riparian conditions.

AFRC is happy to be involved in the planning, environmental assessment (EA), and decision making process for the Finney AMA Project. Should you have any questions regarding the above comments, please contact me at 360-352-3910 or jgroves@amforest.org.

Sincerely,

Jacob Groves
Washington Manager
American Forest Resource Council