



August 20, 2015

Ian Reid
North Fork John Day Ranger District
Umatilla National Forest
PO Box 158
Ukiah, OR 97880

Re: Ten Cent Community Wildfire Protection Project

Dear Ian Reid,

Thank you for the opportunity to provide comments on the upcoming Ten Cent Community Wildfire Protection Project on behalf of Boise Cascade Company. Boise Cascade manufactures engineered wood products, plywood, lumber, and particleboard and distributes a broad line of building materials, including wood products manufactured by the company's wood products division. The company is privately owned and headquartered in Boise, ID, and operates mills that count on wood produced from the National Forests.

I agree with the purpose stated for this project, it is important that the Forest Service treats acreage in the wildland urban interfaces (WUI). It is incredibly important to provide areas of safe egress and escapement corridors for private landholders in and near the national forest boundaries. It is also extremely important to provide safer areas for our wildland firefighters to protect values at risk and private property. I appreciate the effort that the NFJD Ranger District is putting into this project. Below are my additional comments.

- I fully support the cross-boundary work between the Umatilla and Wallowa-Whitman National Forests. This type of collaboration is key for future projects. I am slightly concerned that the potential for two different decisions will create an ineffective project if there is a significant difference in the types of decisions. I encourage the Forest Service to work with stakeholders and personnel of both forests to alleviate these concerns.
- I fully support the amount of commercial harvest because this will not only contribute to firefighter safety but it will also help to pay for some of the treatments. The Forest Service should have an economic goal along with reducing the danger of fire near this community. The economic goal will contribute towards jobs in the local communities as well as reduced firefighting costs. According to the recent report released in 2012, for every dollar invested in the project, the Forest Service saves \$1.45 in firefighting costs (National Forest Health Restoration, pg. iv).
- In developing additional alternatives, please develop an alternative that maximizes the economic benefit for the local communities. By maximizing the economic benefits, the Forest Service will ultimately reap the rewards through increased return on investment.
- Please review the area for additional opportunities that are farther than 1.5 miles from a value at risk. One point five miles seem to be very arbitrary. Placing additional

treatments throughout the area will provide multiple opportunities to catch a fire and residents deserve more than a 1.5 mile buffer from crown fires.

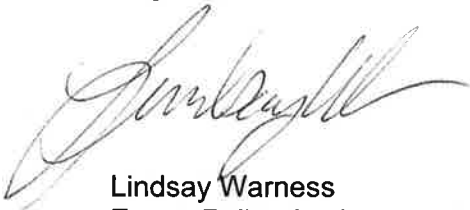
- I encourage the Forest Service to emphasize the three legs of the stool in creating this project, economic, ecological, and social concerns. Many times, the economic and social concerns are treated as secondary issues/outcomes and in doing so, we find that the projects are constrained due to ecological concerns and thus they fall short of meeting social and economic needs. Human uses are a part of the landscape.
- Fire is an important component of the ecosystem. Please look at a more aggressive option that will further alleviate the fire danger in the future. Many times I see projects where we alleviate fire danger for maybe 10 years and plan for a re-entry at that time. I suggest that the Forest Service look at being more aggressive in their treatments and leave a much less dense forest that is less susceptible to crown fires and spotting.
- Fire Regime Condition Class (FRCC) is an important indicator of the forest health, restoring the appropriate condition class throughout the project area should also be a need.
- Please ensure that the no action alternative properly outlines all of the risks associated with doing nothing, including potential firefighting costs, loss of infrastructure/private homes and future economic losses of timber and other products on the national forest. Maintaining the status quo will have a significant impact on the region. Please explain this when developing the no action alternative.
- I support the removal of trees over 21" in diameter and I believe that this type of restriction unnecessarily constrains the ability of the silviculturalist to truly restore the area. I suggest that the Forest Service create some flexibility to allow for the removal of 21" trees in order to meet the objectives associated with the specific stands because it is inappropriate to limit the removal of 21" trees in a cool/moist environment where trees that are 21"+ are not necessarily old growth and may contribute towards making the project more economically viable.
- I support the amendment to the HEI standard in the outdated forest plan. The Habitat Effectiveness Index is no longer a relevant model to be used in planning for elk. While cover may be an important factor for elk, the reduction in cover usually results in an increase in forage which is important for the ungulate population in the area. Early seral openings in forests can play a particularly important role by providing late-summer forage resources for ungulates (Lehmkuhl et al. 2013). John Cook (2005) found that industrially managed forests, through clear-cutting, site preparation, produced a large amount of early-successional vegetation preferred by elk.
- Landscape heterogeneity is incredibly important for both the wildlife and overall vegetation resilience in the mixed moist conifer landscape. A critical feature of wildlife habitat in in eastern Washington and Oregon is the multi-scale (landscape and stand) diversity and juxtaposition of patch types of differing composition and structure (Perry et al. 2011). While somewhat counterintuitive, it is important to note that a landscape can be highly fragmented or patchy, as is commonly the case in landscapes with mixed-severity fire regimes, and still be highly connected for a variety of ecological processes. (Stine et al).

- Please review the economics of the layout costs and discuss them. Layout costs for the project area may be prohibitive and require extensive work from a marking crew. Paint for marking is also expensive. One way to mitigate these costs is to implement designation by description (DxD) or designation by prescription (DxP) methods which has been allowed through the recently passed farm bill.
 - Our studies show virtually 100% success in Leave Tree Marking (LTM) units and 60-70% success in Individual Tree Marking (ITM) units in meeting NEPA Basal Area targets. Please select the tree selection vehicle that will be the most cost effective.
- Please review the economic impact that this will have on the local communities that are near the project area as well as the county.
- Roads are important for recreation, future management needs, fire suppression and livestock management. Please ensure that only the highest priority roads are decommissioned while barricading lower priority roads to protect future management needs. I recommend the least expensive, least intensive and least intrusive option be implemented in this area in order to maximize investment.
- Please be sure to include the beneficial effects that the implementation of this project will have. Many times I read NEPA documents and they do not emphasize the benefits of the project, the main focus is the detrimental effects.
- I suggest in prescription B that the Forest Service re-examine the BA they are planning to leave. In all areas that are designated for treatment, I suggest that the Forest Service leave a low basal area. These areas are very productive and by going to a lower basal area, regardless of the type of crown fire that the stand is predicted to have. This meets the needs of reducing crown fire potential while supply local communities with viable commercial products.
- I'm concerned about the feasibility of implementing 38,000 acres of prescribed fire in the project area. Currently the Umatilla has a significant amount of backlog regarding prescribed fire. I suggest that the Forest Service look at other means to accomplish fuels reduction in the project area, such as mastication. This will provide some additional jobs and economic impacts while reducing carbon released into the atmosphere.
- I encourage the Forest Service to look at implementing skips and gaps that are larger than .5 to 2 acres. Increasing heterogeneity is important on the landscape and 2 acres will be fairly small if that area is designated as a defensible fuel zone. These larger gaps will also aid in the development of more early seral species such as larch.
- Please include an HRV analysis in the project area and let this guide you on including additional treatments. Areas that are generally overrepresented (such as understory re-initiation and stem exclusion) should provide additional opportunities for DFZ and commercial product removal. It is very hard to believe that the Forest Service will be able to return to the area in 10 or 20 years to do additional work to reduce fire danger. Please explain how the alternatives will look in 50 years (especially the no action alternative) so as to adequately explain the potential impacts of this project.

- Climate change is a major concern and setting the landscape up to deal with a hotter/drier climate in the future may mean taking more vegetation off the landscape. Please look at how climate change will impact the different alternatives and create another alternative that will mitigate the potential losses to climate change. Boise Cascade supports removing trees in lieu of watching them lose vigor due to additional stresses in the environment such as heat and lack of water.

Overall, I believe that this project is needed and with a few changes, the Forest Service can meet the needs of the local communities while ensuring that the structures in this wildland urban interface are protected from uncharacteristic wildfire. I look forward to seeing the outcomes of the project and would encourage the Forest Service to place an economic goal into the project as this is an issue regardless of location of the project on the Umatilla National Forest.

Regards,



Lindsay Warness
Forest Policy Analyst
Boise Cascade, LLC
1917 Jackson Ave.
La Grande, OR 97850

Citations:

Cram, D.; Baker, T.; Boren, J. 2006. *"Wildland fire effects in silviculturally treated vs. untreated stands of New Mexico and Arizona"*. Research Paper RMRS-RP-55. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 28 p.

Cook, John G. 2005. Nutritional value of forage species for deer and elk under various forest management strategies. Presentation at the conference Relationships between Forestry, Deer and Elk in Western Oregon, Jan. 19, 2005. Oregon State University, Corvallis.