



July 13, 2018

Monte Fujishin, District Ranger  
Pomeroy District  
Umatilla National Forest  
71 W. Main Street  
Pomeroy, WA 99347

Re: Sunrise Vegetation and Fuels Management Project Draft EIS Comments

Dear Monte Fujishin,

Thank you for the opportunity to provide comments on the upcoming Sunrise Vegetation and Fuels Management 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 and need for this project and I support the proposed action, Alternative B. It is incredibly important to provide a more healthy and productive forest while providing a sustained yield of wood for the local economies. I also support protecting the forest against destructive forest pests and potential wildfire. It is important to maintain these ecosystems in a functional manner while also providing an economic benefit.


- I appreciate that the Forest is proposing to do some even aged management in this project area. I believe that it is important to have a mix of forest structural stages and since the forest is deficit in the Stand Initiation Structural Stage and these clearcuts will help to alleviate that deficit. I also support the conversion of OFMS, which is above its NRV, to OFSS in order to move the trajectory of the landscape towards HRV faster and improve natural ecological processes.
- I also agree that it is important to restore early seral conditions in order to restore the appropriate species mix in the area. Early seral species are important to maintain the ecological integrity of the project area. What effect will these changes have on the function of the areas that are receiving no treatment (such as the Inventoried Roadless Area)? It would appear that by reducing the density and changing the species composition, there will be less likelihood of an insect and disease epidemic as well as the ability to better manage fire in the project area.
- I'm concerned that you are not treating any Riparian Areas, leaving these areas overstocked and treating the upland acres would seem to disconnect the function of the riparian areas from that of the upland forests. These areas are arguably the most sensitive locations in the forest and not attempting to mitigate disturbance in these areas sets them up for uncharacteristic disturbance that will highly alter the functionality of this area.

- Please explain the differences in susceptibility to future insect and disease disturbance between the two alternatives. It is important that we understand whether one alternative will have a greater effect on the reduction in susceptibility than the other.
- On Page 3-59, the EIS states "Alternative C favors providing wildlife habitat by disturbing fewer acres in the short-term." Please explain this statement, does disturbing acres through management make them unusable as habitat or would it be a habitat conversion where the landscape would favor a different specie?
- Please better explain the difference in cumulative effects between Alt. B and Alt. C with regards to 3.6 Vegetation management. Since Alternative C does approximately ½ of the management of Alternative B, it would appear that there would be different cumulative effects on the area under Alternative C as the landscape would accumulate fuels at a higher rate and not reduce the amount of late seral species and structures to the degree necessary to effect change?
- In table 3-17. Fire regime condition class post treatment for Alternative B, it states that under Fire Regime 2, over 3,600 acres will be left in condition class 3. Please explain why you are not treating these additional acres to return them to their historic fire regime.
- Why is the forest only proposing to close the Devil's Tailbone Road early under alternative C? What would be the benefit of keeping it open vs. closing it early? It seems that closing it under alternative B would help in the HEI score?
- Why is the Forest Service proposing to leave the majority of elk cover in the moist forests? Isn't the Moist Forest where the Elk need additional Forage during the late summer because all the other forage is too dry? It seems that leaving additional cover in the moist forest would be counterintuitive to keeping the elk on the National Forests during late summer/early fall because there is more forage.
- On page 3-146, it states that the FS plans to install culverts and remove them after completion of silvicultural treatments. Please explain why it is necessary to remove the culverts? Wouldn't this increase sediment into the riparian areas?
- Is evapotranspiration a concern for this area? It would appear that by leaving the project area denser under Alternatives A and C, there would be less water absorbed into the system.
- Please explain how undeveloped lands fit into the forest plan? What is the direction of the Forest Plan with regards to how these lands are to be managed within the landscape? These "undeveloped" lands should be managed according to the management area they are under in the Forest Plan. Since these lands do not have any special designation in the Forest Service Handbook or under the Forest Plan, I do not believe that "undeveloped" should have any special connotation or require analysis.
- I support treating undeveloped lands on the landscape to address the purpose and need. It is important that we continue to use these landscapes for multiple use purposes and treating these landscapes will also enhance the recreational values, such as hunting and gathering on this landscape.

- Why is the agency's planning costs not included in the economic analysis? It is important to acknowledge the investment that the agency has already put into the landscape.
- Why is the agency planning to mark timber under both Alternative B and Alternative C? There are new congressional tools that would allow the FS not mark these units and save some funding.
- 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 and thus they fall short of meeting social and economic needs. Human uses are a part of the landscape.
- 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.

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 restoring and maintaining the ecological health of the forest in this area. Protecting the private land and general forest from catastrophic wildfire is extremely important. I look forward to seeing the outcomes of the project and be happy to meet with officials if clarifications are needed. If there are specific questions about the needs of the timber industry or logging systems, Boise Cascade would be happy to assist the Forest Service.

Best Regards,



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**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.
- Lehmkuhl, J.F.; Lyons, A.L.; Bracken, E.; Leingang, j.; Gaines, W.L.; Dodson, E.K.; Singleton,

- P.H. 2013. Forage composition, productivity, and utilization in the eastern Washington Cascade Range. Northwest Science. 87: 267-291.
- Perry, D.A.; Hessburg, P.F.; Skinner, C.N.; Spies, T.A.; Stephens, S.L.; Taylor, A.H.; Franklin, J.F.; McComb, B.; Riegel, G. 2011. The ecology of mixed severity fire regimes in Washington, Oregon, and Northern California. Forest Ecology and Management. 262: 703-717.
- Stine et al 2014. The Ecology and Management of Moist Mixed-Conifer Forests in Eastern Oregon and Washington: a Synthesis of the Relevant Biophysical Science and Implications for Future Land Management. USDA, Forest Service, Pacific Northwest Research Station, General Technical Report, PNW-GTR-897.