



September 7, 2018

Mike Rassbach
Walla Walla Ranger District
Umatilla National Forest
US Forest Service
1415 West Rose Street
Walla Walla, WA 99362

Re: Glass Restoration Project

Dear Mike Rassbach,

Thank you for the opportunity to provide comments on the upcoming Glass Project on behalf of Boise Cascade, LLC. 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.

As a member of the Umatilla Collaborative, I would like to endorse the discussions and agreements that this group has worked on regarding this project. I believe that these agreements are balanced and reflect a comprehensive agreement by multiple stakeholders. I appreciate that the Forest Service's dedication to the collaborative process and look forward to seeing the results. I'd like to add the comments below to the discussion.

- I support Alternative A, it provides the opportunity for the most comprehensive restoration in this landscape.
- In looking at the economics, I noticed that the PNVs for both of the alternatives are negative. Please look at opportunities to reduce the densities of the stands to the lowest management zone because it is not likely that the Forest Service will return to treat the area within the 20 year projected return interval. These treatments should be aggressive to ensure that these areas are maintained longer into the future.
- I am concerned about the subsoiling proposed by the Forest Service. This can be very expensive and I'm not sure it meets the needs of the Forest. Please review opportunities to monitor the effectiveness of the proposed action.
- 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 mixed-conifer landscapes 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).

- I appreciate that the FS reached out to us to discuss logging systems and some of the concerns in these areas. Involving industry in these discussions prior to finalizing NEPA can be very beneficial to the development of the project. I am concerned that logging systems are being prescribed in the NEPA, I'd encourage the FS to move away from this practice because there are many different ways to achieve objectives and by prescribing logging systems in the NEPA, the FS has boxed in the options to meet the objectives.
- I do not support the use of an arbitrary diameter limitation for the 16 acre commercial treatment of the Riparian Management Areas. Please explain why this limitation is being placed on the management and the science behind the restriction. There is already a restriction on removal of 21" trees and my concern is that this additional restriction will not allow the silviculturalist to properly treat the area.
- Please explain why all non-commercial/pre-commercial thinning will be done by hand crews? This seems to be excessively expensive when there may be other, less expensive ways to manage this investment.
- The language in the draft EA is very prescriptive regarding logging systems. Please discuss this in terms of outcomes rather than discussing the types of logging systems, this may be an area where industry may be able to provide some different options to achieve the desired outcome. I also encourage you to contact a logging systems specialist or partner to review the opportunities on the landscape. Many times we see a significant drop in harvesting due to terrain or other limiting factors, involving a systems specialist prior to the development of the NEPA may help provide some different options that the FS could consider to maximize revenues for reinvestment purposes.
- I support the use of temporary roads to facilitate treatments on the landscape.

I think this will be an interesting project and look forward to working with the Forest Service on it. Please feel free to reach out to me if you have any questions on the above comments. I look forward to seeing this project implemented.

Regards,



Lindsay Warness
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