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Boise Wood Products



**Boise Cascade**

October 31, 2018

Eric Watrud, Forest Supervisor  
Umatilla National Forest  
72510 Coyote Road  
Pendleton, OR 97801

RE: Objection to Willoughby Urban Interface Protection Project

**Objector:**

Boise Cascade, LLC  
90 South 21 Avenue  
Elgin, OR 97827

**Objector's designated representative:**

John Fullerton  
Log Procurement Manager  
Boise Cascade, LLC  
90 South 21 Avenue  
Elgin, OR 97827  
[JohnFullerton@bc.com](mailto:JohnFullerton@bc.com)  
(541)786-1305

This is an objection to the draft FONSI on the Willoughby Urban Interface Protection Project. The draft of the Finding of No Significant Impact (FONSI) was released on Sept. 18, 2018. The responsible official making the decision is Paula Guenther, District Ranger of the North Fork John Day District of the Umatilla National Forest. The name of the project is the Willoughby Urban Interface Protection Project.

Boise Cascade submitted comments via email for the draft environmental assessment (June 2018). Boise Cascade Company objects based on prior specific comments submitted in response to the Draft EA.

**I. Analysis of the no action alternative does not adequately address the detrimental effects of doing nothing in this area.**

Boise Cascade objects to the inadequate analysis of the "No Action" alternative. The Forest Service does not truly outline the effects of maintaining the current trajectory of management in the area. The effects of doing nothing have very high consequences through increased fire danger, loss of old forest habitat, increased homogeneity in the planning area and loss of potential wildlife habitat. These are all significant threats if the project is not implemented and should be outlined in the no action alternatives to adequately explain the risk of maintaining the status quo.

**II. The project does not adhere to the Best Available Science because it artificially caps removal of trees to less than 21" dbh.**

The Forest Service is not using best available science in the application of the 21" diameter limitation. This artificial barrier does not allow proper application of scientifically sound best management practices and because the scientist is not able to treat the stand appropriately. This area is mainly a warm/dry ecosystem that has been encroached upon by grand/white firs. Under the current management direction, the Forest Service will be required to leave a large, young white fir and remove more desirable species such as Ponderosa Pine in order to meet the fuels management objectives.

**III. Inadequate economic discussion of project impacts.**

Multiple commenters addressed the need to discuss the economics of this projects and the need to understand how the project will impact the local communities and timber industry as a whole. In order to implement this project, the Forest Service needs a viable timber industry to implement and process the fiber being removed as well as help to reduce the fuels associated with these types of projects. There was no discussion of economics, the return to taxpayers or the impact that this project will have on the counties through receipts. In order to ensure that this project is viable and completed, the Forest Service needs to analyze how economics play into the project. The complete removal of an economic discussion from this project doesn't fully address the concerns of the public nor does it ensure that this project is viable.

**IV. Relief Requested**

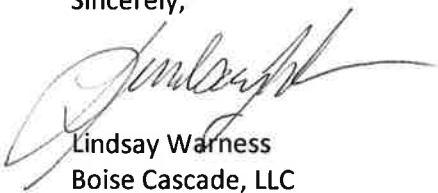
Boise Cascade is generally in support of this project but has concerns with the landscape analysis and the lack of economic viability discussed in the EIS. We understand that the Forest Service has worked hard to balance the needs and desires of the various constituents who are heavily invested in the project area and we appreciate the hard balancing act. We are concerned that with this project, the economics and artificial diameter limitation will not allow for full implementation of planned treatments within the project area.

Alternatively, if the Umatilla National Forest is committed to selecting and implementing the alternative described in the draft FONSI, Boise Cascade would be willing to withdraw this objection.

In the event there are multiple appeals are filed on this decision, Boise Cascade, LLC respectfully requests that the resolution meeting (36 CFR 218.11) be held as soon as possible with all objectors present at the North Fork John Day District Headquarters. Boise Cascade believes that having all objectors together at one time, while perhaps making for a longer meeting, in the long run will be a more expeditious process to either resolve objections or move the process along.

Thank you for your efforts on this project and your consideration of this appeal. Boise Cascade looks forward to our initial resolution meeting within the next two weeks. Please contact our representative, John Fullerton, at the address and phone number shown above, to arrange a date of the resolution meeting.

Sincerely,



Lindsay Warness  
Boise Cascade, LLC