



Boise Cascade

April 13, 2022

Doug McKay
Umatilla National Forest
Heppner Ranger District
117 S Main St.
Heppner, OR 97836

Dear Doug,

On behalf of Boise Cascade Wood Products LLC, thank you for providing the opportunity to comment on the draft EIS for the Ellis Integrated Vegetation Project.

Boise Cascade Wood Products LLC has been an active purchaser on the Umatilla NF for decades. Specifically, the Heppner Ranger District is a vital part of our log basket.

Boise Cascade Wood Products generally supports the Purpose and Need for this project which includes:

- Increase forest health and vigor
 - Reduce tree densities and restore composition toward HRV
 - Improve forest resiliency to handle wildfires and disease outbreaks
- Improve terrestrial wildlife habitat
 - Create diversity to better distribute wildlife habitat
 - Improve elk distribution by improving security, increasing quality and quantity of forage
- Provide forest service products to support local communities
 - Maintain critical infrastructure and workforce for the wood products industry
 - Supporting local economies and businesses
 - Offsetting the management costs of non-commercial thinning

Boise Cascade Wood Products generally supports Alternative 5. We believe the increased commercial harvesting is vital to maintain the current infrastructure, support local communities and create family wage jobs. We also believe that by cutting some trees greater than 21" dbh you will be able to meet silvicultural targets while creating a

Page 2
April 13, 2022

more fire resilient landscape. Also, Alternative 5 would create much needed forage for ungulate species to help better distribute elk off private land.

Here are a few key items that Boise Cascade Wood Products strongly encourages:

1. Minimum sawlog specifications should be 17' long and 6" top. The standard of 8' long, 5" tops does not align with local industry standards.
2. Please consider making Tethered Logging optional on designated skyline units. This increases logger availability and creates a safer environment for our valued loggers.
3. We support the use of DxP silviculture prescriptions.
4. Please consider using virtual boundaries.
5. Please limit operating restrictions and move toward an end-result oriented operating season. (No firm dates, make it condition based.)
6. Please make the non-saw (pulp) material optional removal.
7. Please consider selling sawlog material by the ton.
8. We support cutting some trees greater than 21" dbh to meet silvicultural prescriptions and bring landscape more toward HRV.

Sincerely,



Jordan Lanman

Logging Superintendent
Boise Cascade Wood Products, LLC