Data Submitted (UTC 11): 12/2/2016 8:00:00 AM
First name: Lindsay
Last name: Warness
Organization: Boise Cascade
Title: Forest Policy Analyst
Comments: Ten Cent Draft EIS Comments

Hello,

Please find attached comments on behalf of Boise Cascade for the Ten Cent Draft EIS. Please confirm receipt and if you have any questions, please feel free to contact me.

Best Regards,

Lindsay Warness

Lindsay Warness

Forest Policy Analyst

Boise Cascade

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Contents of Attached Letter:

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Boise Wood Products

December 2, 2016

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 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 headquartered in Boise, ID, and operates 5 manufacturing facilities in Northeast Oregon 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 wild land 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.

[bull] I support the most aggressive treatment outlined in the draft EIS, I suggest that the Forest Service treat the acreage identified in Alternative 2 at the intensity level of Alternative 3. Providing a safe escapement route for residents of Granite during a wildfire is extremely important and by doing a more intense treatment to a larger number of acres, the Forest Service will not have to return as quickly.

[bull] The use of the criteria in Chapter 70 of the directives for the 2012 Planning Rule is inappropriate because it creates the illusion that the areas identified during the inventory stage of the wilderness process are proposed wilderness. This illusion feeds the narrative that these areas qualify as wilderness without going through the additional analysis required to determine if the area should be proposed as wilderness for congressional designation. The process described in chapter 70 should only be applied at a Forest Level Analysis and not on a project by project basis because application at a project level does not include the other three necessary steps for determination if the area actually meets the intent of the Wilderness Act.

[bull] I'm concerned that not enough is being done on the landscape to fully address the carrying capacity of project area. According to the Range of Variability Analysis, the upland forest groups are above their range for high density levels (Ten Cent EIS, pg.77). None of the alternatives fully address the density/stocking issues across the project area. Without addressing the areas will continue to decline in health and become susceptible to insects disease and fire. The Forest Service is missing the opportunity to fully address the issues with this project

[bull] Please discuss the relative priority of this area for prescribed fire. I am concerned that the Forest .is relying too much on prescribed fire to address the overstocking situation on the ground. Currently, both the Wallowa-Whitman and the Umatilla National Forests have over 100,000 acres of prescribed fire that has been planned but not implemented. I[rsquo]m encouraged by Alternative 3 because it reduces the need for landscape prescribed fire, however, the acreage proposed for treatment is less than Alternative Two both in commercial treatments and prescribed fire. Please discuss what areas are most important to burn in order to meet the purpose and need of the project. I[rsquo]d suggest reviewing the Little Dean Project form the Wallowa-Whitman, they identify first, second, and third priorities to help the public understand what was likely to be implemented as a priority.

[bull] There is a great deal of emphasis on the old growth and late and old habitat in the EIS and the potential effects that this project will have on it, however, there is less emphasis on the benefits to the wildlife who need a different type of habitat to survive. The open old forest and open young forest are lacking across the National Forests and it is important to recognize that these species need to have their habitat maintained in the ecosystems as well. It is appropriate to change some of the LOS and OFMS and place it on a trajectory to become Old Forest Single Story habitat which is severely lacking within the project area.

[bull] Please discuss the number of jobs associated with each alternative. It is important that the Forest Service address the three legs of the stool for a properly balanced project, the social, economic and ecological effects of the project on the local community.

[bull] Since the Secure Rural Schools payments have lapsed, please discuss the effects of this project on the county where it is located. According to the agreement 25% of all revenues from the timber sales will go to the counties to cover schools and roads projects. It is important the Forest Service discuss the effect of this project on these important endeavors.

[bull] I'm concerned about the lack of stand initiation and stem exclusion stages within the project area (table 3-21, Ten Cent EIS, pg. 81). These structural stages provide an important habitat for wildlife and over the past 20 years or so, these habitats have been neglected and we are losing them in favor of dense fire-prone forests. Please look at reducing the densities and changing the structural stages of some of the proposed treatment areas to accommodate the wildlife that need these types of habitats.

[bull] Species composition is also important. I'm concerned that the desired future condition for this landscape will not be met because the prescriptions are not aggressive enough to allow the early seral species to grown in areas. Landscape inertia is a concern and without ting decisive steps to move the cover types into a condition that allows for early seral development, the late seral species will persist and eventually there will be less early seral species functioning in the ecosystem.

[bull] I[rsquo]m concerned that the landscape will continue to be homogenous without the proper treatment; this will allow fire, insects, and disease to flourish outside of the treated areas. There is a significant amount of the project area that does not have treatment and without compartmentalizing the landscape, a wildfire will have significant effect on these areas and create another homogenous landscape. There should be additional treatments in areas outside of wilderness and IRAs that help to break up the canopy to allow the ecosystem to function properly. 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 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. (Stien et al)

[bull] I support the use of temporary roads on the landscape. Many times these roads are very minimal impact and have a great return.

[bull] I'm concerned that the no-action alternative does not adequately outline the consequences of doing nothing on the landscape. Please expand on the consequences of doing nothing. The decision to do nothing is still a decision that will affect the dynamics of the forest, the local communities, the needs of the wildlife for a diverse set of habitat, and the economics of the local communities.

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 structure in the 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

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