Data Submitted (UTC 11): 6/15/2018 7:00:00 AM
First name: Lindsay
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Organization: Boise Cascade
Title: Forest Policy Analyst
Comments: June 15, 2018

Paula Guenther ATTN: Leslie Taylor

North Fork John Day Ranger District Umatilla National Forest

PO Box 158

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Re: Willoughby Urban Interface Protection Project Dear Paula Guenther,

Thank you for the opportunity to provide comments on the upcoming Willoughby Urban Interface 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 privately owned and headquartered in Boise, ID, and operates mills 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 wildland urban interfaces (WUI). I appreciate the effort that the NFJD Ranger District is putting into this project, however, I'm concerned about the limited size of the project area. Planning documents tend to be extremely time and investment intensive and using those funds to plan a 3,500 acre project seems to be fairly expensive. Below are my additional comments.

[bull] Please explain if this project is being designed using the HFRA authorities? I appreciate the brevity of this EA and applaud the FS for reducing their analysis to an appropriate level for this size of project.

[bull] I'm concerned that economics was not a factor in developing this project as well. I appreciate that it is solely a fuels reduction project but economics should always play a role in developing a project because if a project is developed that is too expensive, the likelihood of it being implemented is very low.

[bull] Please include how much volume that is being planned for removal. It is important to disclose the estimation of volume because this will give an idea of economic return for both the Forest Service and potential for local industries. There is a great deal of non-revenue generating activities included in this project and I'm concerned that the FS is counting too much on appropriated funding to complete the work in this area.

[bull] I suggest that the Forest Service review the areas slated for commercial harvest closely to better understand what types of logging systems will be needed, in the past I've seen units planned and dropped because it was unfeasible to treating these units in the current markets. If you have questions or concerns, please feel free to contact me and I will set up a time for one of our logging supervisors to review the stand and provide suggestions. Please note that helicopter logging is not feasible at this time.

[bull] I support the landscape burning for this project, however, how much of the landscape is considered cool/moist? Is this stand type conducive to landscape burning or is there better way to treat those acres?

[bull] What is the priority for completing the landscape burning? I know that the Umatilla has a great deal of prescribed fire acreage on the shelf. If you are not able to complete the burning, is there another way to further reduce the fire danger?

[bull] I encourage the Forest to use Designation by Prescription or Designation by Description when implementing this project.

[bull] I understand that this is a fire/fuels reduction project, however, I'd like more information regarding the structural stages of these stands are and why you chose to the treat the stands you currently have identified. Were the other stands within HRV for density, structure, and composition? Are all the stands that are overstocked identified for treatment? Are there other opportunities for commercial removal?

[bull] 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 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).

[bull] Please ensure that pulpwood removal is optional for the purchaser. This provision will ensure that all commercially viable fiber is used in the most cost effective manner.

[bull] Roads are important for recreation, future management needs, fire suppression and livestock management. Please ensure that only the highest priority roads are decommissioned while barricading lower priority roads to protect future management needs. I recommend the least expensive, least intensive and least intrusive option be implemented in this area in order to maximize investment.

[bull] 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 ensuring that the structures in this 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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Citations:

Cram, D.; Baker, T.; Boren, J. 2006. "Wild/and fire effects in si/vicultural/y 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.