Data Submitted (UTC 11): 10/13/2020 7:00:00 AM
First name: Lindsay
Last name: Warness
Organization: Woodgrain Millwork
Title: Forest Policy and Environmental Manager
Comments: Dear Mr. Jeffries,

Woodgrain Millwork has five divisions across the United States and employs well over 2,500 direct employees. Woodgrain Millwork owns and operates 3 sawmills and one particleboard plant in Northeast Oregon where we employ approximately 350 direct employees and produce multiple wood products as a division of Woodgrain Millwork. As one of the last milling facilities in Northeast Oregon, we are dependent upon material from our national forests to maintain and grow our business. One of the major constraints that we face for our business is timber supply due to the reduction in management on the local national forests.

The potential to alter the current eastside screen to allow for more discretion and flexibility in applying the eastside screens is a welcome endeavor. The facilities in Northeast Oregon have existed for almost 100 years and the adoption of the "temporary" eastside screens has led many problems across the landscape due to planning and implementation complexities. I am in support of altering the current version of the screens to allow for more flexibility in managing the landscape to do what is right on the landscape. Our ability to manage the landscape using science-based plans has been seriously hindered by the administrative 21" diameter limitation that is not based on science.

Woodgrain is advocating for the Adaptive Management Alternative. We believe that if the Forest Service desires to adopt a "durable, science-based alternative to the 21-inch standard in the Eastside Screens", the Forest Service must avoid prescribing how to meet the desired outcomes. Placing another guideline or standard that prescribes outcomes is a major concern as there is potential for unintended consequences down the road. I'm concerned that by implementing a new standard or guideline across the entirety of the forest, we will have the same issue down the road where we find that these standards or guidelines hinder our ability to manage the forest scientifically and efficiently.

Additional Comments:

Please review the EA and differentiate between the alternatives to a greater degree. The effects and impacts of each of the alternatives are very similar and the charts
depicting the vegetation effects summary are not clear as to what alternative will have to most/least impact with regards to the desired alternative. This makes it extremely
difficult to discern the tradeoffs associated with each alternative.

I'm concerned that we are now stating that we will protect every tree greater than 150 years old on the landscape in the proposed action and Old Tree Standard Alternative.
This seems to be substituting one blanket guideline or alternative for another. We've lived with the 21" diameter limitation for 25 years and have now realized that this blanket
standard was detrimental to forest health due to unintended consequences where we needed to manage a stand for stand health/fire adaptability and were unable to truly
meet the needs of the project due to the limitation for removal of 21" trees. Ptease analyze if there will be any unintended consequences to a blanket protection of trees
over 150 years.

Instead of discussing an age or diameter limitation, I suggest you outline better the morphological characteristics you would be managing for. I'm concerned that if we have
a 150 year limitation, we may be setting ourselves up for additional issues if it is determined that a tree that is not

showing the morphological characteristics of "old trees"
is cut and determined to be older than 150 years old.

If the definition of old trees is considered to be trees that were alive pre-European settlement and this is determined to be trees greater than 150 years in 1994, since we
are currently in 2020 with the likely implementation of this decision in 2021, shouldn't the definition of old trees be considered to be trees greater than 175 years old?

If the FVS modeling analysis under 3.1.3.4, why did the Forest Service analyze a different forest thinning type under Adaptive Management vs. the Old Tree guideline and
standard? Would it not be possible to manage with uneven age management techniques in the blues under the proposed action and old tree alternative? This is a major concern as choosing either of those two alternatives would seriously hinder the ability of the Forest Service to adapt to new science and develop a heterogeneous forest. If we impose a standard or guideline that will produce a similar forest type due to lack of differentiation in management techniques, we will have a homogenous forest in
the future that will not allow for uneven aged management due to the restrictions of removal of trees over 150 years of age.

Also, under the 3.1.3.4 section, it states that under the old and large tree guideline that you simulated for removal of trees >250 years old. Is this a typo or is there a reason you decided to use 250 in lieu of the 150 year limitation?

In the EA you state that grand fir or white fir use more water than the shade intolerant species, is there an expectation that removal of these shade-tolerant species at a higher
rate will reduce the drought stress on the landscape?

I'm concerned about the emphasis of the Forest Service on LOS as a structural class across the landscape. There is a considerable lack of early and mid-open structural
classes across the landscape. Will the old tree guideline or standard allow for creation of these structural classes across the landscape?

In section 3.1.5.4 Large Trees, the EA discusses that large trees have increased in managed areas but decreased managed areas. Is there a similar discussion that could
be had regarding old trees in managed vs. unmanaged stands? What is the driver for the decrease in old trees? If it is similar to the large tree discussion, this would support
the adaptive management alternative that allows for site-specific decisions that allow for flexibility in meeting the management objectives across the landscape and not just for
old trees.

- The economics associated with projects on the National Forest are important drivers for the local communities. The analysis does a poor job of discussing the differences in
economics between the alternatives. It would be natural to expect that the removal of a diameter limitation to better meet the needs of the landscape would result in a higher
volumes coming off the acres associated with timber harvest. The potential to harvest larger trees will result in a higher return on investment for the Forest Service. It would
also be natural to assume there will likely be a higher volume/acre in order to meet the project level objectives.

- Table 19 depicting Alternative Ordinal Ranking Across Benefit Types should show a quantifiable difference between the alternatives or a hard ranking system to showcase
the true differences between alternatives.

Overall, Woodgrain is pleased to participate in the opportunity to participate and provide comments on the preliminary EA discussing changes to the unscientific 21" diameter limitation that has hindered science-based restoration across our landscape. We believe that the Adaptive Management alternative is the best alternative moving fol'Vl/ard as it will allow for sitespecific flexibility across the landscape to achieve the appropriate structure and species that our landscape is losing. It is important that we restore heterogeneity to our landscape to create the resiliency as well as adapt to future climate and weather variations that may impact our national forests. Please feel free to contact me with any question or clarifications that you may need.

Best Regards.