1917 Jackson Ave., La Grande, OR 97850
T 541-962-2000 F 541-962-2035
Boise Wood Products

Boise Cascade

April 1, 2016

Keith Lannom
Forest Supervisor
Payette National Forest
500 North Mission Street Building 2
McCall, ID 83638
Comments-intermtn-payette@fs.fed.us

Re: Middle Fork Weiser River Landscape Restoration Project

Dear Ms. Hutchison,

Thank you for giving me the opportunity to provide comments on the Middle Fork Weiser River Landscape Restoration Project on behalf of Boise Cascade Company. We are in general agreement with the project and are happy to see the Forest Service (USFS) producing more "landscape scale" projects. I encourage the USFS to continue to do so in order to economize costs. Boise Cascade offers the following comments on the proposed project:

- As a member of the Payette Forest Coalition, Boise Cascade supports the proposals from the Payette Forest Coalition, alternative 2 with the modifications proposed by the Payette Forest Coalition.
- Boise Cascade supports vegetation treatments in PVGs 6-11 because of the ecological benefit of developing a heterogeneous pattern across the landscape to break up the contiguous fuels and provide a better balance of wildlife habitat for the desired species.
- I support the work being done in the lynx habitat, according to a recent article in National Geographic (http://voices.nationalgeographic.com/2016/03/07/shadow-cat-canada-lynx-silently-cross-u-s-state-national-borders/), the lynx do not depend on the old growth forests but more on the early successional forests where the Snowshoe hares hide.
- Please continue to focus on economics as a key issue for the project. The wood products industry is extremely important to the restoration of our national forest system. A suite of projects similar to this project are needed to provide sustainability and longevity of the industry and the local communities near this project.
- I am concerned that the project treatments will not truly alleviate the adjacent private landowners concerns about Elk impacts. I suggest that the Forest Service look at incorporating these concerns into the prescriptions for vegetation treatment. It is important that these animals have sufficient forage on the national forest to entice them to the stay on the national forest instead of causing damage to the private lands adjacent to the area.
- I support work to restore Whitebark Pine in the project area. It is important that the forest work towards restoration of this key focal species.

- I suggest that the Forest Service also look very closely at the forest/private land border in order to ensure that the national forest is a good neighbor. Reducing risk in the WUI is important to ensure that the landowner's values are taken into account with regards to wildfire. I suggest that the Forest Service ensure that the areas treated within the WUI are treated towards to lower end of the of the management zone to reduce the risk of wildfire traveling from the national forest to the private lands. A running ground fire is much easier to manage than a running crown fire.
- We support the implementation of restoration activities in moist, mixed conifer (MMC) forests because a recent science synthesis produced by the Pacific Northwest Research Station indicates that the fire regimes are more frequent than once thought and that the forests "...today contain a significantly greater component of shade-tolerant species (e.g. white or grand fir or understory Douglas-fir) than occurred historically." (Stine et al, pg. 17). In the same synthesis it states that "...MMC forests experienced frequent to moderately frequent fires (<20-50 years) and fire severity was typically mixed, but patches of low and high-severity fire also occurred." (Stine et al, pg. 17). These MMC forests are in need of restoration and should be managed at a landscape scale to better emulate historic disturbances.
- I appreciate the guidelines that the Forest Service has incorporated that do not include a limitation on removal of trees over 21". It is appropriate to remove some of the larger trees in order to restore the structure on the landscape as well as allow for early seral trees to repopulate these areas.
- Canopy Cover is also a concern. High canopy cover is associated with sustained crown fire potential. All of the alternatives leave excess acreage in the high canopy cover class. Please review any additional options to reduce the canopy cover to lessen the fire danger in the area and meet the purpose and need of the project. High Canopy closure also impacts elk nutrition availability, especially in the moist, mixed conifer areas.
- Depending on the contract vehicle used, please consider using "designation by prescription" or "designation by description" in order to cut down on layout and implementation costs.

Thank you again for the opportunity to comment. We look forward to seeing outcomes of this project.

Regards,

Lindsay Warness
Forest Policy Analyst
Boise Cascade, LLC

1917 Jackson Ave.
La Grande, OR 97850

Citation:

Stine et al. "The Ecology and Management of Moist Mixed-conifer Forests in Eastern Oregon and Washington: a Synthesis of the Relevant Biophysical Science and Implications for Future Land Management." http://www.fs.fed.us/pnw/publications/MMC_Synthesis_21Nov13.pdf