

**Malheur Lumber Co.**  
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May 23, 2003

Dan Tippy  
Bureau of Land Management  
Prineville Field Office  
3050 NE 3<sup>rd</sup> St.  
Prineville, OR 97754

RE: Little Canyon Mt.

Dear Mr. Tippy,

Thank you for the opportunity to comment on the Little Canyon Mountain Project. With the tremendous amount of dying trees, it is very important that this project be implemented rapidly to salvage the value and reduce the risk to the urban interface. I hope that you will do all you can to accomplish this project in an expeditious manner.

After reviewing the EA for this project, alternative F makes the most sense from a scientific standpoint. This alternative would maintain the forest vegetation within the capabilities of the site that it is growing. Managing based on-site specific capabilities to maintain the size and species distribution that the resources will allow is the only way to go.

There are a couple of things in alternative F that need a little fine-tuning. The first is the basal area target for the Douglas-fir dominated stands. The 80-100 square feet per acre that is listed is on the high end to be sustained for a long period. Factoring in the BLM's return interval, I would suggest that you reduce that figure to at an average of 80 or 70-90 square feet of basal area per acre. This level is more sustainable over time but is well stocked to ensure other resource values are maintained.

The other part of the alternative that needs to be clarified is the trees under 7 inches. If this diameter is taken at the scaling end of a log then I would agree that anything under that diameter should be burned. My fear is that this diameter refers to diameter at breast height or DBH. If so, the economics of trying to utilize trees down to 7 inch DBH is very poor. Those small pieces will reduce the value of your project significantly.

Please contact me if you have any questions. I look forward to seeing this project implemented.

Sincerely,

Steven J. Courtney, CF  
Operations Forester