



Via: [cara.ecosystem-management.org/Public//CommentInput?Project=41350](http://cara.ecosystem-management.org/Public//CommentInput?Project=41350)

January 7, 2019

Brandon Houck, District Ranger  
Attn: Leslie Taylor  
Heppner Ranger District  
P.O Box 7  
Heppner, OR 97836

Dear Brandon:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to comment on the Ellis Integrated Vegetation Management Project (Ellis).

AFRC is a regional trade association whose purpose is to advocate for sustained yield timber harvests on public timberlands throughout the West to enhance forest health and resistance to fire, insects, and disease. We do this by promoting active management to attain productive public forests, protect adjoining private forests, and assure community stability. We work to improve federal and state laws, regulations, policies and decisions regarding access to and management of public forest lands and protection of all forest lands. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Umatilla National Forest and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of Oregon forest sector employs approximately 61,000, with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

AFRC supports landscape scale projects in eastern Oregon. AFRC has the following comments on Ellis.

The proposed action for Ellis is to treat up to 110,208 acres within the 114,834 acre planning area. What is not clear, is which Umatilla Land and Resource Management Plan Ellis will be prepared under. The Record of Decision for the recently released Blue Mountains Forest Plan revision has not yet been signed. Please provide information on whether Ellis is under the existing forest plan or the new revised forest plan. These comments are written to address either Forest planning document.

AFRC strongly encourages treating as many acres as possible and treatment of the majority of mature timber stands, either through aggressive thinning across all age classes or regeneration harvests, within the Ellis planning area. Our members depend on a predictable and economical supply of timber

products off Forest Service land to run their businesses and to provide useful wood products to the American public. The treatments on the Ellis project will likely provide short-term products for the local industry and we want to ensure that this provision is an important consideration for the decisionmaker as the project progresses. As we will discuss later in this letter, the importance of our members' ability to harvest and remove these timber products from the timber sales generated off this project is paramount. We would like the Forest Service to recognize this importance by **revising the purpose and need** for Ellis to clearly articulate this factor. Please add **“contribute to a predictable, sustainable supply of timber and other forest products to help maintain the existing forest products infrastructure.”** Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on National Forest System (NFS), land particularly those lands designated as commodity emphasis, but also on lands with other designations. Various laws direct and allow the Forest Service to provide a sustainable supply of timber and other forest products from the Nation's forests including the Multiple-Use Sustained Yield Act (MUSYA) of 1960 and the National Forest Management Act (NFMA) of 1976. The MUSYA authorizes and directs the Secretary of Agriculture to develop and administer the renewable resources of timber, range water, recreation and wildlife on the national forests for multiple use and sustained yield of the products and services. NFMA is the primary statute governing the administration of national forests. This Act requires the Secretary of Agriculture to assess forest lands, develop a management program based on multiple-use and sustained-yield principles and to implement a resource management plan for each unit of the NFS. Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on NFS lands.

The consideration of active management on every acre of appropriate land, regardless of its land allocation, is important to our membership as each year's timber sale program is a function of the treatment of aggregate forested stands across the landscape. AFRC supports treating as many acres as possible. We urge the Umatilla to look for ways to maximize treatment where it is proposed and to avoid deferring units or setting aside portions of units for what is often referred to as “skips” (please consider the fact that there will be acres in the project area that will essentially be “skipped”). Skips within the watershed are plentiful, what is not plentiful are openings. For example, the Malheur National Forest no longer utilizes the “skips and gaps” approach as this concept is difficult to implement and work around. Further, it appears that wildlife are not utilizing the skips and adequate areas for cover are already available along riparian areas and near project units to meet this need. AFRC requests that the Umatilla utilize this concept in Ellis. If the Umatilla truly wants to diversify the landscape, then the focus should be on creating openings in the forest and minimizing untreated areas within the Ellis planning area.

AFRC strongly supports and encourages treatments in all plant vegetation groups including those in cooler moister areas and in higher elevations. Treatment in cool moist and higher elevation vegetation groups was supported by other resource professionals as was expressed during a field trip to the Ellis planning area on October 2, 2018 sponsored by AFRC. In addition to AFRC members, the field trip was attended by Bill Richardson from the Rocky Mountain Elk Foundation (RMEF) and Steve Cherry from Oregon Department of Fish and Wildlife (ODFW). Dr. Mike Johnson, Blue Mountains entomologist and Diane Shirley and Hunter Cady from the North Fork District joined the field trip at Stop #2. Stop #2 represented a cool moist vegetation type with a very densely stocked stand encroached on by grand fir of all age classes. Dr. Johnson provided an overview of current conditions emphasizing that drought, warmer weather patterns, early snow melt and projections that these trends may be more

pronounced in the future are setting these forests up epidemic insect outbreaks. Stressed, suppressed trees in intermediate age classes are everywhere further contributing to dry conditions through evapotranspiration. Dr. Johnson suggested that a more aggressive approach in treating these stands is critical and that ranging from 45 to 75 percent of full stocking across the landscape is desirable. He further recommended that vertical diversity is not necessary on “every square foot” of ground. Appropriate species composition along with vertical and horizontal diversity is critical across larger areas. Various timber stands must constantly be thinned along a time continuum to “reset” the clock for different habitat types and to provide ideal habitats for different species of wildlife. RMEF and ODFW also supported aggressive treatments in the Ellis planning area to benefit big game. Vast herds of elk present in this area and are congregating on private lands because of lack of suitable forage and openings on NFS lands. Please find “Reconciling wildlife conservation to forest restoration in moist mixed conifer forests of the inland northwest: A synthesis” recently published in the Journal of Forest Ecology attached to this letter.

The timber products provided by the Forest Service are crucial to the health of our membership and local economy. Without the raw material sold by the Umatilla the mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material, our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service lands. To be clear, we are advocating that you consider the economic viability of the project and make sure that it is designed in a way that makes sense for the market. This is not the same thing as maximizing economic value of the project.

AFRC requests that the Forest identify some younger growth stands in Ellis that can be managed with a focus on growing and sustaining wood fiber for the future. While it is acceptable to manage for different resource benefits in these stands, such as some larger structure, the main emphasis must be growing trees sustainably to harvest and process for future generations.

AFRC advocates allowing as much flexibility as possible within the contract while still meeting the management goals and guidelines contained in the NEPA document. This flexibility allows the purchaser to use the most economically viable systems thus increases the ability of the purchaser to pay higher stumpage rates. Placing restrictions on the specific machinery to be used severely impacts the economic viability of the timber sale while not improving the end result. Locking in the specific types of logging systems and equipment in the NEPA document removes flexibility during the implementation stage. Analyzing areas for “tractor/cable” and working with industry on the ground during implementation will provide for best meeting restoration objectives that are economically viable.

Logging contractors must average 10 months of work per year in order to be profitable. Developing the Ellis proposal with that in mind is critical. AFRC advocates allowing as much flexibility as possible within the contract while still meeting the management goals and guidelines contained in the NEPA document. This flexibility allows the purchaser to use the most economically

viable systems thus the ability to pay higher stumpage rates. Placing restrictions on the specific machinery to be used severely impacts the economic viability of the timber sale while not improving the end result. Descriptions should be limited to “ground based” or “cable” with a description of the objectives and outcomes desired. Locking in the specific type of logging system in the NEPA document removes flexibility during the implementation stage. Contractual design and packaging on Ellis should be as flexible as possible. It is critical that industry be allowed to develop and provide plans to suitably meet objectives and implement projects to make them more cost effective.

The Ellis scoping proposal does not specifically mention “road decommissioning” however this practice is becoming very common on NFS projects. AFRC is concerned about the “decommissioning” and removal of NFS system roads across the landscape in the Blue Mountains. Established road infrastructure provides access for fire and future management and decommissioning of system roads must be carefully analyzed. Please find methods of mitigating the impacts of established system roads that do not require formal decommissioning and that allow for re-opening in the future both fire management and fire access purposes

Conifer management in riparian areas and meadows is critical for establishment and growth of desirable shrubs, willows, grasses, and other suitable vegetation for the meadow or riparian area. The Ellis project should establish appropriate future densities of conifer in these areas by evaluating the size and number of conifers that historically occupied these areas. If meadows historically did not support any trees, all trees regardless of species, age and size, should be removed to restore these areas to historic conditions. Removal of larger trees, even on a very limited basis, will greatly improve the economic viability of the Ellis project. AFRC fully supports and encourages the removal of commercial material generated as a result of riparian and meadow enhancement projects and supports investing that value directly back into funding future uneconomical riparian or meadow enhancement projects.

AFRC supports work in juniper woodlands and shrub steppe areas. AFRC does not support leaving young juniper greater than 21 inches or unilaterally leaving “old” juniper regardless of site conditions. Decisions on when to leave juniper on the landscape must be site specific and the flexibility to make that decision must be provided to land managers.

All trees, regardless of age, size and species should be removed from aspen stands. If there is a need to remove trees greater than 21 inches DBH to meet objectives of the project, they should be removed even if this would require a forest plan amendment. They also provide a seed source for the future. Trees 21 inches and larger compete with mahogany and aspen just like their smaller counterparts. With regard to aspen, please refer to Forest Service General Technical Report, PNW-GTR-806, May 2010, **Aspen Biology, Community Classification, and Management in the Blue Mountains**. Diane Shirley, one of the coauthors of this publication, was present on the October field trip. Ms. Shirley articulated the critical nature of reducing conifers all over the landscape and from the rapidly declining clones in the Ellis planning area.

AFRC supports prescribed burning activities but we are concerned that the vast number of acres of existing burn backlog in combination with new projects can be accomplished in a timely manner. Please provide a general plan of how and when prescribed burning is going to be accomplished in the Ellis planning area.

Carbon sequestration as it relates to climate change is a topic that often gets broadly analyzed in NEPA documents. The analysis that the Forest Service will likely be conducting through the ensuing environmental analysis will discuss forest health benefits, effects on carbon sequestration and storage potential and meeting the purpose and need all within the context of an economically viable timber sale. Ellis consists of a variety of treatments, including precommercial and commercial thinning, which may affect the treated stands ability to resist, respond, or be resilient to climate change in the project area. The direct, indirect, and cumulative effects of carbon sequestration and storage and its relationship to climate change in regard to this project must be viewed at much larger scales than the general project area because the scientific literature regarding these, only support analysis on larger scales. There is a large body of literature on management strategies that have the greatest carbon sequestration benefit. In general, actively managing the forest will produce a positive net increase in carbon sequestration thus a positive benefit to reducing anthropogenic effects on climate change (IPCC, 2007). AFRC urges you to analyze the type of treatments being proposed and determine through the literature how they will affect carbon sequestration potential through time.

AFRC does not support publishing of actual design criteria and “best management practices” (BMPs) in NEPA analysis documents. Please incorporate this information by reference.

I look forward to the next steps in the planning process on the Ellis project, which has the potential to provide significant ecological, social and ecological benefits to the local area and the region. Please feel free to contact me if I can assist you with determining the economic feasibility of silviculture treatments and logging system requirements.

Sincerely,

A handwritten signature in cursive script that reads "Irene K. Jerome".

Irene K. Jerome  
AFRC Consultant  
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