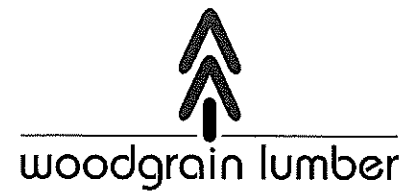


**Woodgrain Millwork  
Lumber Division  
1917 Jackson Ave.  
La Grande, Oregon 97850**



April 15, 2022

Eric Watrud  
Forest Supervisor, Umatilla NF  
US Forest Service  
72510 Coyote Rd.  
Pendleton, OR 97801

Re: Ellis Forest Restoration Project

Dear Eric Watrud,

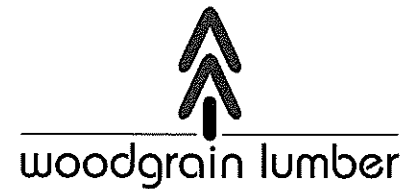
Woodgrain Millwork has five divisions across the United States and employs well over 2,500 direct employees. Woodgrain Millwork owns and operates 3 sawmills and one particleboard plant in Northeast Oregon where we employ approximately 350 direct employees and produce multiple wood products as a division 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.

I am in general agreement with the purpose and need stated for this project and appreciate all of the hard work the Forest Service has put into working on this project. Woodgrain supports the use of the current Northern Blues Forest Collaborative Zones of Agreement (attached) and see that this project is very well designed to utilize these agreements. I support Alternative 5 as it has the most ecological, social and economic benefits. It also sets up this landscape to withstand uncharacteristic disturbance. My additional comments below:

- I support the work done in the OFMS stands to place these stands on the path to becoming OFSS, this type of stand is deficit in the project area (and throughout the forest). These types of stands are needed to increase habitat for the White-headed woodpecker as well as provide a natural fire break. Removing late seral species from these stands is appropriate and will help to restore the natural range of variability within the project area.
- It is my understanding that this area has limited moisture that affects how the trees grow on the site. I'm concerned that if we leave too many trees on the landscape, we run the risk of creating a forest that is not healthy due to the continued stress from lack of moisture on the landscape. Leaving overstocked timber stands may provide additional cover and habitat but if it is not sustainable on the landscape, we should remove these excess trees in order to ensure viability. I appreciate that the Forest Service is willing to significantly reduce the basal area to meet the stocking standards.
- The project is proposing prescribed fire on more than 87,000 acres the project area, is this feasible? It is my understanding that the Umatilla has thousands of acres of prescribed fire backlogged. Are there other options to reduce the fire danger in the area, such as mastication, more aggressive treatments, etc.?

- Each of the action alternatives have the same amount of prescribed fire. How will this affect the cover in the stands, is there a risk that this prescription will not be implemented? In only treating the dry forest in Alternative 3, how will the fire behave across the landscape that has not been treated? We need to set the landscape up to receive fire and arbitrarily limiting the treatment to dry forest does not set the entirety of the landscape up to receive this fire and benefit from prescribed fire.
- It is appropriate to remove trees that are greater than 21 inches. It is important to leave a variety of cohorts on the landscape to ensure that we have a variety of habitats as well as replacements. This is especially significant for dry forests because these shade-tolerant trees are competition for the shade-intolerant species which shifts the composition of the stand away from the desirable species because they are out-competed for nutrients and sun.
- This work will take place over many years, please explain how the implementation and building of the temporary roads will not be all done at once and that they will be rehabbed on the landscape.
- Please define what best management practices you will use when building/using the temporary roads. Please also indicate if these temporary roads will be built on the top of old roadbeds or if they will be completely new. Please look to see if there are old roadbeds that could be used in these circumstances.
- I support the work done in the OFMS stands to place these stands on the path to becoming OFSS, this type of stand is deficit in the project area (and throughout the forest). These types of stands are needed to increase habitat for the White-headed woodpecker as well as provide a natural fire break. Removing late seral species from these stands is appropriate and will help to restore the natural range of variability within the project area.
- There is a great deal of emphasis on the old growth and late and old habitat in the EIS and the potential effects that this project will have on it, however, there is less emphasis on the benefits to the wildlife who need a different type of habitat to survive. The open, old forest and open young forest are lacking across the National Forests and it is important to recognize that these species need to have their habitat maintained in the ecosystems as well. It is appropriate to change some of the LOS and OFMS and place it on a trajectory to become Old Forest Single Story habitat which is severely lacking within the project area.
- Treatment in cool/moist designated forests is also incredibly important. These are arguably the most productive landscapes that need restoration. The lack of heterogeneity sets this landscape up for
- 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 mixed-conifer landscapes 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).

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- I appreciate that the Forest Service is acknowledging that undeveloped lands have no management standards and do not have management standards or guidelines. I am concerned that the Forest Service has begun to analyze these lands based on public comment. These lands are dynamic and the arbitrary definition of developed lands being lands with substantial noticeable management activities misconstrues how these lands have been used and implies that these lands have not been harvested nor have they been used for grazing. I encourage the Forest Service to further discuss how landscapes are dynamic and managed stands may not have visible evidence of management and these stands are managed under the Forest Plan, not an arbitrary public definition that has no standing.
- The Forest Service should make every effort to package the forest products and stewardship activities in a way that is attractive to contracted work providers (service contractors, purchasers, permittees, subcontractors, vendors), while ensuring high priority expensive treatments are completed.
  - Reinvest the revenue received from the forest products to partially finance the non-revenue generating projects identified in the project.
  - Integrate collaborative input on prioritization of the non-revenue generating projects.
  - Consider those greater long-term project resource benefits resulting from lesser short-term project impacts.

Thank you again for the opportunity to comment. I am available if any of the comments need additional clarification or discussion. I appreciate the time that the Forest Service took to put this project together and I look forward to seeing outcomes of this project.

Best Regards,

A handwritten signature in black ink, appearing to read "Lindsay Warness", with a long, sweeping underline.

Lindsay Warness  
Division Safety, Environmental, and Forest Policy Manager  
Woodgrain Millwork, Inc.  
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La Grande, OR 97850  
[lwarness@woodgrain.com](mailto:lwarness@woodgrain.com)

