First name: Brian
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Organization: Greater Hells Canyon Council
Title: Restoration Director
Comments: From: Brian Kelly <bri> dellscanyon.org <mailto:brian@hellscanyon.org> ></mailto:brian@hellscanyon.org></bri>
Sent: Thursday, January 31, 2019 8:54:24 AM
To: Watrud, Eric J -FS
Subject: welcome back & project
Hi Eric,
I hope that you and your staff are doing well and getting back into the swing of things after the shutdown. I truly
hope that the federal government will continue to fund Forest Service staff to manage the public lands without
further interruption.
I really appreciate you meeting with me and Rob Klavins of Oregon Wild a while back. I look forward to continued
conversations about the national forests that we all treasure.
In that spirit, I feel I should share some concerns we have about the proposed Ellis project. You may have seen
these concerns described in our scoping comments. I won't try to duplicate those comments, but I have copied
four paragraphs below to flag for you at an executive level some of our thoughts about the Ellis project proposal.
I am grateful for your attention to our concerns. I look forward to future discussions about this proposed project
and other aspects of the unique and wonderful Umatilla National Forest.
Please don't hesitate to reach out to us for any reason. I look forward to future discussions.
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Best wishes,
Prion Kally
Brian Kelly

Data Submitted (UTC 11): 1/31/2019 8:00:00 AM

From the Ellis project scoping comments:

"Preliminary review of the proposed action shows that some aspects of the project would potentially be aligned with the above criteria. In particular, we appreciate and support efforts to improve hydrology of wet meadows, implement prescribed burning at a landscape level, and improve habitat for wildlife.

However, we have significant concerns and questions that we hope will be addressed as this project moves forward. Notably, the proposed action would authorize intensive logging over the vast majority of this very large project area. The forests that would remain after logging would be quite sparse, according to the targeted basal areas, and would include regeneration cuts (e.g. clearcuts). This level of heavy logging and the extent of its impacts raise a number of concerns including negative impacts to canopy cover, wildlife habitat, water quality, and carbon sequestration. Timber production should not come at the expense of the public forest.

We understand that the Purpose and Need statement for this project identifies needs to "aid in protecting values at risk; promote the health and safety of public and firefighters; and contribute to social, cultural, and economic needs." However, these needs could be effectively achieved through limited vegetation treatments on specific and strategic locations on the landscape to assist fire managers in the event of a wildfire, rather than widespread and heavy logging across more than one hundred thousand acres.

For example, according to the National Fire Protection Association, "Experiments, models and post-fire studies have shown homes ignite due to the condition of the home and everything around it, up to 200' from the foundation. This is called the Home Ignition Zone (HIZ)." https://www.nfpa.org/Public-Education/By-topic/Wildfire/Preparing-homes-for-wildfire"

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Brian Kelly

Restoration Director

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