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First name: Brenna

Last name: Sahatjian

Organization:

Title:

Comments: I am writing to oppose the Ellis timber sale. I have spent time in the Umatilla National Forest and my major concerns include:

* The huge scale of the sale and the intensity of logging planned for the excessively expansive fuel breaks up to one and a half miles out to either side of roads, forming huge contiguous blocks of what would become barren open stands;

* Commercial logging within old growth forest and cool moist mixed conifer forest under alternatives 2, 4, and 5;

* Logging of an unlimited number of large (and inevitably mostly old) Douglas and Grand firs up to 30" dbh under alternative 5, which should not be legal since it was not discussed in the scoping stage of the public comment process;

* Extensive logging of undeveloped lands that have never been logged or roaded[mdash]from 16,785 acres under alternative 3 and 17,103 acres under alternative 4 to 27,515 acres under alternatives 2 and 5;

* Damaging commercial logging within Riparian Habitat Conservation Area buffers along streams and wet meadows and aspen under alternatives 4, 2, and 5 in violation of Forest Plan requirements;

* Drastic logging loss of suitable marten habitat: 56% reduction of suitable habitat (loss of 14,021 acres) under alternatives 2 and 5, with less loss from alternative 4 and much less loss under alternative 3;* Significant long-term impacts to soils on a landscape scale that would be the worst under alternatives 2 and 5, less under alternative 4, and least for the action alternatives under alternative 3;

* Extreme loss of suitable Pileated woodpecker habitat to logging: losing 41,402 acres of 43,578 total acres of Pileated woodpecker source habitat, with 41,109 acres lost under alternative 4 and 35,285 acres lost under alternative 3;

* Construction of "temporary" roads that are rarely decommissioned under all action alternatives except alt. 3, and insufficient mileage of road closures and especially of road decommissioning under alternatives 3 and 4;

* Grossly inadequate analysis in the Environmental Impact Statement of effects analysis to forest values, with significant omissions of standard information that would inform public comments and decision-making, and failure to disclose scientific controversy and to use the full range of best available science.

I ask the Forest Service either to rewrite the EIS with more detailed, in-depth analysis and release a new EIS for another 45 day comment period, or scrap this timber sale

Sincerely,

-Brenna Sahatjian