



April 18, 2022

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On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide comments on the Ellis Integrated Vegetation Project (Ellis) Draft Environmental Impact Statement (DEIS). Ellis is located on the Heppner and North Fork John Day Ranger Districts of the Umatilla National Forest. The planning area encompasses approximately 110,000 acres and proposes a variety of resource treatments throughout the planning area including 75,000 acres of mechanical thinning activities in Alternatives 2 and 5 which will provide raw materials for our members over a period of years. This area is very important and popular to local residents and AFRC members.

AFRC is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, and California. AFRC represents over 50 forest product businesses and forest landowners. AFRC's mission 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. The Ellis project will, if properly implemented, benefit AFRC's members and help ensure a reliable supply of public timber in an area where the commodity is greatly needed.

AFRC supports landscape scale projects and strongly encourages treating as many acres as possible 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 this provision is an important consideration for the decisionmaker as the project progresses. As we 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. This project is also critical to mitigate heavy fuel loads on as many acres as possible to limit the potential for uncharacteristic wildfire behavior in the planning area.

AFRC strongly supports Alternative 5 as the preferred alternative and we appreciate the serious consideration the District has given to our comments, both written and during field trips,

over the past several years. The results of the analysis clearly indicate that Alternative 5 best aligns with your Forest Plan direction and best meets the project's purpose and need. Many of the design features in the other alternatives, including the retention of trees over 21 inches DBH, are not supported by the current science nor are they components of your amended management plan. The DEIS states that Alternative 5 "was developed to incorporate the signed Forest Management Direction for Large Diameter Trees in Eastern Oregon Decision Notice." If this is accurate, we conclude that the other alternatives were developed in a way that does not "incorporate management direction." Implementing an alternative that is inconsistent with management direction would be extremely troubling.

Purpose and Need

The Ellis Project is intended to reduce tree density in overstocked stands and improve ecosystem health. The desired outcome of the proposed activities is to enhance landscape resiliency by creating and maintaining diverse vegetative conditions at both stand and landscape scales. The overall objectives for the project include increasing forest health and vigor; enhancing unique plant communities; improving wildlife habitat; maintaining and continuing public and traditional land uses; and protecting values at risk and increasing public and firefighter safety in the event of a wildfire. The following needs were identified which drove the development of the proposed action, tier to the goals and objectives outlined in the Umatilla Forest Plan and help move the project area towards desired conditions. (DEIS p. 1-2). AFRC strongly encourages appropriate treatments in all vegetation groups.

Riparian Area Management

Conifer management in riparian areas and meadows is critical for the establishment and growth of desirable shrubs, willows, grasses, and other suitable vegetation for the meadow or riparian area. The Ellis project should establish appropriate densities of conifer in these areas by evaluating the size and number of conifers that have historically occupied them. 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.

All trees, regardless of age, size and species should be removed from aspen stands and mountain mahogany patches. If there is a need to remove trees greater than 21 inches DBH to meet the objectives of this project, they should be removed. The recent amendment to the eastside screens permits removal of trees of any size and age if necessary to meet project objectives. The firm constraints of the previous standard have been replaced by a guideline that is designed to be adaptable to various forest conditions. Trees 21 inches and larger compete with mahogany and aspen just like their smaller counterparts, and provide a seed source for the future. With regard to aspen, please refer to the Forest Service's General Technical Report, PNW-GTR-806, May 2010, Aspen Biology, Community Classification, and Management in the Blue Mountains.

AFRC supports work in juniper woodlands and shrub steppe areas. AFRC does not support leaving young juniper greater than 21 inches. Please include analysis and provisions in the final EIS to allow for commercial removal of juniper.

Operations

The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these 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 forestland.

The primary issue affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EA's and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on descriptive end-results; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Umatilla market area with a variety of skills and equipment. Developing an EIS and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the EA and contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Though some of the proposal area is planned for cable harvest, there are opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make cable yarding more efficient. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a more even distribution of woody debris following harvest. Cable/skyline logging infrastructure is largely unavailable in eastern Oregon and central and south Idaho due to a myriad of reasons including safety for workers. Tethered-assist equipment is becoming a more viable and available option for felling and yarding on steep slopes. This equipment has shown to contribute little additional ground disturbance when compared to traditional cable systems.

Please prepare your NEPA analysis documents in a manner that will facilitate this type of equipment.

Road Decommissioning

The Ellis DEIS has varying number of miles of permanent road decommissioning in different alternatives. AFRC does not support permanent decommissioning of established roads if potential resource damage could be mitigated through road closure or partial decommissioning. However, we are aware of the need to limit access in many areas. Road infrastructure is extremely important and expensive to construct. It may be necessary to utilize these roads again for future management which the Forest has recognized. With the roadbed already in place the costs of re-opening are reduced. Seasonal closures or other measures to close roads that are utilized rather than “decommissioning” should always be considered. There also may be the need to access areas during wildfire events or for local county emergency services personnel during search and rescue missions. In the last three years, counties in eastern Oregon have seen dramatic increases in these types of missions. The global pandemic of 2020 and 2021 has seen unprecedented numbers of individuals utilizing the national forests, often with limited knowledge of the local areas and conditions and regardless of the season of year.

Carbon Literature

We would like to encourage the District to consider several documents related to carbon sequestration related to forest management.

McCauley, Lisa A., Robles, Marcos D., Wooley, Travis, Marshall, Robert M., Kretchun, Alec, Gori, David F. 2019. Large-scale forest restoration stabilizes carbon under climate change in Southwest United States. *Ecological Applications*, 0(0), 2019, e01979.

Key points of the McCauley paper include:

- Modeling scenarios showed early decreases in ecosystem carbon due to initial thinning/prescribed fire treatments, but total ecosystem carbon increased by 9–18% when compared to no harvest by the end of the simulation.
- This modeled scenario of increased carbon storage equated to the removal of carbon emissions from 55,000 to 110,000 passenger vehicles per year until the end of the century.
- Results demonstrated that large-scale forest restoration can increase the potential for carbon storage and stability and those benefits could increase as the pace of restoration accelerates.

We believe that this study supports the notion that timber harvest and fuels reduction practices collectively increase the overall carbon sequestration capability of any given acre of forest land and, in the long term, generate net benefits toward climate change mitigation.

Gray, A. N., T. R. Whittier, and M. E. Harmon. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. *Ecosphere* 7(1):e01224. 10.1002/ecs2.1224

Key points of the Gray paper include:

- Although large trees accumulated C at a faster rate than small trees on an individual basis, their contribution to C accumulation rates was smaller on an area basis, and their importance relative to small trees declined in older stands compared to younger stands.
- Old-growth and large trees are important C stocks, but they play a minor role in additional C accumulation.

We believe that this study supports the notion that, if the role of forests in the fight against climate change is to reduce global greenhouse gasses through maximizing the sequestration of carbon from atmospheric CO₂, then increasing the acreage of young, fast growing small trees is the most prudent management approach.

We 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
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