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First name: Brian

Last name: Kelly

Organization: Greater Hells Canyon Council

Title: Restoration Director

Comments: Greater Hells Canyon Council

La Grande, Oregon

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Via: US Forest Service NEPA Projects Home ([usda.gov](https://www.usda.gov))

Doug Mc Kay, Heppner District Ranger

117 South Main Street

Heppner, OR 97836

Comments on the Ellis Integrated Vegetation Project, Draft Environmental Impact Statement

Dear Ranger McKay,

I'm writing on behalf of the Greater Hells Canyon Council (GHCC) to provide comments on the Draft Environmental Impact Statement (DEIS) for the Ellis Integrated Vegetation Project .

GHCC is a non-profit conservation organization based in La Grande, Oregon. Our mission is to connect, protect, and restore the wild lands, waters, native species and habitats of the Greater Hells Canyon Region, ensuring a legacy of healthy ecosystems for future generations. GHCC actively participates in Forest Service proceedings and decisions concerning the management of public lands within the Umatilla National Forest. We are an "interested public" for timber sales.

Introduction

We've tracked the development of the Ellis project along with other members of the public. Thank you for the efforts of the Forest Service to keep the public informed about the project. We really appreciate the Forest Service staff involved in leading a field trip, answering questions, holding an informational video conference, and otherwise keeping the public informed about the process. I was pleased to be able to attend the field trip to the Ellis area in October 2020, and to attend the video information session in November 2021.

We're pleased to provide these comments.

Ellis Project Description

The Ellis project is located on the Heppner and North Fork John Day Ranger Districts of the Umatilla National Forest. Ellis is about 15 miles southeast of Heppner and 7 miles west of Ukiah in Morrow, Umatilla and Grant counties. Approximately 110,000 acres of National Forest lands have been considered for treatment.

As described in the Forest Service Purpose and Need for the Ellis project:

"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 Draft EIS includes four Action Alternatives and a No Action Alternative.

The Action Alternatives include mechanical thinning, small-diameter mechanical and non-mechanical (hand) thinning, mechanical and non-mechanical fuels treatments, landscape burning, pruning, planting of native vegetation, and aspen and meadow enhancement.

Issues Raised in Greater Hells Canyon Council Scoping Comments

On January 15, 2019, GHCC submitted detailed Scoping comments for the Ellis project.

We're referring to our Scoping comments here as they continue to describe some of our concerns with the Ellis project and the DEIS.

Our Scoping comments included the following section:

"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>

Importantly, recent research increasingly shows that Oregon's forests are incredibly important for carbon sequestration, and that logging contributes more to Oregon's carbon emissions than forest fires. Please see the following articles for more information.

<https://www.hcn.org/issues/50.11/climate-change-timber-is-oregons-biggest-carbon-polluter>

<https://www.pnas.org/content/115/14/3663>

<https://static1.squarespace.com/static/59c554e0f09ca40655ea6eb0/t/59dd4984a8b2b090a38f07a1/1507674513035/2017-OGWC-Legislative-Report.pdf>

We strongly encourage the Forest Service to take a step back and rethink this initial approach to the Ellis project. We think that most or all of the "purpose and need" for the project can be met

without the extensive and intensive logging being proposed."

Additionally, our Scoping comments included detailed specific requests for the NEPA analysis of the Ellis project. These include:

Considering a reasonable range of Alternatives

Considering the best available science and giving a hard look at the environmental consequences of the decision

Using a distance-banding approach when determining impacts to elk

Considering a broad array of impacts related to forest roads

Analyzing all reasonably foreseeable direct and indirect environmental impacts

Impacts to soil conditions

Impacts to sensitive, threatened, and endangered species

Impacts to sensitive plant, lichen, bryophyte and fungal species

Impacts to wildlife and wildlife connectivity

Impacts to snag habitat

Impacts on old forests and large trees

Impacts to multi-storied old forests

Impacts to moist and cold forests

Impacts to Riparian Habitat Conservation Areas

Impacts from temporary roads

Impacts from forest roads

Impacts from forest insects and diseases

Analyzing all connected, cumulative, and similar actions that could contribute to cumulative effects.

Cumulative effects on climate

Cumulative effects to forest health from grazing, logging, and other management activities

Cumulative impacts from forest roads.

GHCC Comments on the Ellis Project DEIS

In addition to our Scoping comments, GHCC would like to submit the following additional comments specific to the DEIS.

We appreciate that the Forest Service has created decision space within the Action Alternatives to address some of our concerns raised during Scoping.

In particular, we appreciate the following:

We appreciate and support that 87,735 acres of Prescribed Landscape Burning are proposed for all four Action Alternatives.

We support eliminating the construction of temporary roads as provided by Alternate 3. We believe that the Ellis project will better meet its goals and objectives without the use of temporary roads. We very much appreciate the development of an Alternative that approaches forest management without the impacts of temporary roads. (Please see our Scoping comments for additional information about the environmental impacts of temporary roads. Also, please refer to our scoping comments for additional information about the environmental impacts of the proposed forest treatments described below).

We appreciate that Alternative 3 focuses the mechanical forest treatments in the dry forest types, with no mechanical treatments proposed in moist and cold forest types or old forest structure, except in the Low-Intensity Zone (LIZ).

We appreciate that Alternative 3 would eliminate the proposed mechanical treatments in areas within Old Forest Single-Story (OFSS) and Old Forest Multi-Story (OFMS) and in moist and cold upland forest types located outside of the "Lower Intensity Zone" (LIZ).

We appreciate and support that all Action Alternatives remove the proposed mechanical thinning from within the Potamus Inventoried Roadless Area (IRA).

We appreciate that Alternative 3 would limit the extent of fuel reduction treatments outside of the dry forests.

We support the highest level of elk security acreage (32%) provided in Alternative 5.

We support the highest level of road decommissioning proposed in Alternatives 2 and 5. We note that road decommissioning provides employment and economic benefits to the community.

We support the reduced open road densities described in Alternatives 2 and 5. We encourage the Forest Service to maximize security for elk and all species of wildlife while maintaining reasonable levels of access for dispersed camping and recreational use of the forest.

In any prescription involving cutting juniper, please retain all junipers with old-growth structural characteristics. These old-growth junipers are important for wildlife. They tend to grow in micro-sites that historically escaped wildfire mortality.

We appreciate that we do not see a proposal for Forest Plan Amendments in the DEIS.

Logging Large and Old Trees

We strongly oppose the logging of any species of large trees (21 inches or greater in diameter at breast height) as proposed in Alternative 5. The largest trees are the most-fire-resistant trees. Logging the largest and most fire-resistant trees would create the opposite effect of the desired conditions of forest resiliency for the Ellis project. Additionally, the largest trees are the largest sources of carbon sequestration in our forests. Logging the most productive carbon-sequestering trees would create negative environmental impacts for the huge challenge of climate change. We believe you can meet the purpose and need of this project without logging these important wildlife and wildfire resistant trees. Please do not do this.

Further, the removal of the standard within the Umatilla Forest Plan that prohibited the logging of trees 21" and over (commonly known as the 21" rule) was done through a flawed process that was both procedurally and substantively inconsistent with the National Environmental Policy Act (NEPA) and the National Forest Management Act (NFMA). Any action taken pursuant to the amended management direction for large diameter trees would also be inconsistent with both NEPA and NFMA.

If you do decide to go ahead with this activity please disclose the number of trees 21" and over that will be logged; the species, age and size of these trees, and how many acres of forest within and/or outside stands classified as Late and Old Structure will include large tree logging. It is near impossible to determine the effect of large tree logging without this information.

Logging in Undeveloped Lands

We strongly advocate that the footprint of all mechanical treatments should be limited to lands that were previously logged and roaded. Undisturbed forest soils should remain undisturbed. Un-roaded lands should remain un-roaded.

Request for a New Alternative

In view of the concerns described above, we ask that a new alternative be created and selected in the forthcoming draft decision. This new alternative would contain no temporary road construction, no large tree logging, no logging within RHCA areas and would greatly scale down the scale and scope of commercial logging planned for the Ellis project area. It would also include the analyzed road closures that are needed to provide elk security and no logging within moist mixed conifer, cold forest or old forest types.

Conclusion

Thank you for the opportunity to participate in this planning process and for your review of these comments. GHCC looks forward to working with the Forest Service as this project progresses. Please don't hesitate to contact me with any questions.

Sincerely,
Brian Kelly

Brian Kelly, Restoration Director
Greater Hells Canyon Council