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First name: Tristan
Last name: Henry
Organization: Theodore Roosevelt Conservation Partnership
Title: Oregon Field Representative
Comments: July 17, 2025
Objection Review Officer: Forest Supervisor Eric Watrud Umatilla National Forest 72510 Coyote Road Pendleton, OR 97801
RE: TRCP Objection to the Final Environmental Impact Statement (FEIS) and Draft Record of Decision for the Ellis Integrated Vegetation Management Project
Forest Supervisor Watrud:
The Theodore Roosevelt Conservation Partnership (TRCP) hereby submits this formal Objection to the FEIS and draft Record of Decision for the Ellis Integrated Vegetation Management Project, pursuant to 36 C.F.R. Part 218. TRCP previously submitted specific written comments on the Ellis Project DEIS (dated April 18, 2022), thereby establishing our standing to file this objection. We appreciate the opportunity to continue our engagement in this process and are committed to ensuring the project meets its stated goals of improving wildlife habitat and forest resiliency.
Demonstration of Standing and Procedural Compliance: TRCP's April 18, 2022 comment letter raised the issues outlined below, fulfilling the requirement that objections be based on prior specific comments This objection is being filed with the appropriate reviewing officer (Forest Supervisor Eric Watrud, as the responsible official) within the specified 45-day period. The points of objection are numbered and explained in detail, and we have included recommended remedies for each issue.
Our primary objection is that the selected Alternative 2 - Modified fails to provide adequate elk security habitat and does not implement necessary road closures, thus falling short of the project's Purpose and Need. This deficiency undermines a core objective of the Ellis Project - improving elk habitat and distribution - and contravenes both the FEIS's own findings and the Umatilla National Forest's management requirements. Additionally, we object to aspects of the vegetation management prescriptions (including extremely low residual tree retention in some units) and a lack of clarity on reseeding timelines for disturbed sites, as these could hamper habitat restoration. Finally, we have concerns about the protection of sensitive habitats, notably quaking aspen stands, which may not successfully regenerate without explicit safeguards. Each of these issues was raised in our prior comments and remains insufficiently addressed in the FEIS and draft decision. We respectfully ask that the Forest Service remedy these issues before finalizing the decision. Our specific objections and requested remedies are detailed below.
Issue 1: Inadequate Elk Security Habitat and Failure to Meet the Purpose and Need
Explanation of Objection: The Ellis Project's Purpose and Need statement explicitly recognizes the problem of poor elk habitat distribution and insufficient security cover. The FEIS states that "wildlife habitat is not well distributed and has limited vegetative diversity" and that "elk security and forage quality and quantity are limited," noting that elk are not fully utilizing their range on the forest . The desired outcome is to "improve distribution of elk by: improving security, increasing quality and quantity
of forage". TRCP's own comments on the DEIS echoed this need, emphasizing that improving elk distribution requires both enhanced forage and, critically, increased security cover through travel management (road density reductions). We specifically urged the Forest Service to adopt an alternative that would meet or exceed a minimum of 30% of the project area in secure elk habitat, consistent with recommendations from subject matter experts and numerous scientific studies .
Unfortunately, the selected alternative (Alternative 2 - Modified) falls far short of these elk habitat objectives. According to the FEIS and Draft Record of Decision, Alternative 2 - Modified would result in approximately 13,376 acres of elk security habitat, representing only 11% of the project area . This is essentially no improvement over current conditions, as 11% was the pre-project security level . In other words, the chosen alternative leaves elk security cover virtually unchanged, thereby failing to accomplish the project's stated Purpose and Need to improve elk distribution and security . Indeed, the Draft ROD itself acknowledges that the preferred alternative does not increase security cover, noting it "will continue at the pre-project level of 11%" .

Maintaining such a low percentage of secure habitat cannot improve existing conditions for elk or meet the project's desired outcomes. It also ignores "Relevant Issue #4" identified in the planning process, which expressed concern about whether the proposed actions would effectively improve or maintain elk habitat and distribution . By proceeding with an alternative that does not improve elk security, the decision contradicts the FEIS's own issues analysis and the expert input that at least ~30% of the area should be in security cover for effective elk habitat use .

Moreover, the lack of increased security cover conflicts with the Umatilla National Forest Land and Resource Management Plan's direction for big game habitat. The project area includes Management Areas designated for big game winter range (C3) and wildlife habitat (C4), which have goals to "provide high levels of potential habitat effectiveness" for big game, including through adequate forage and cover components . By continuing to provide only ~11% security cover, the selected alternative does not meet these Forest Plan goals. As OHA's objection highlighted, 11% secure habitat is nowhere near the "minimum recommended 30% security cover" for elk . Such a low level of security will likely perpetuate the very issue this project seeks to resolve: elk will remain vulnerable to disturbance, continue to be "pressured to move off of the forest," and fail to fully utilize public land, leading to ongoing distribution problems and conflicts (e.g., elk concentrating on private lands) . In summary, the decision to select Alternative 2 - Modified, without adjustments, is arbitrary and capricious with respect to elk habitat needs, because it does not follow the evidence and analysis in the FEIS nor respond to the substantive comments submitted by TRCP and others on this issue. It renders the project unable to meet its fundamental wildlife habitat improvement purpose.

Recommended Remedy for Issue 1: To resolve this objection, TRCP requests that the Forest Service modify the decision to include more robust road closure and access management measures, as were analyzed under Alternative 5 (Improved Elk Security) or a comparably effective approach. Alternative 5 in the FEIS demonstrated that it is feasible to achieve roughly 30% or more of the project area as secure elk habitat (approximately 37,000 acres, or 32% of the area) by significantly reducing open road densities. We urge the Forest Service to incorporate the following specific changes:

Increase elk security cover to at least 30% of the project area. This should be accomplished by closing, decommissioning, or seasonally gating additional roads in strategic locations, thereby creating larger contiguous blocks of habitat where elk can avoid disturbance. The selection of roads for closure should prioritize those bisecting or fragmenting known elk cover areas. (We note that Alternative 5 analyzed the closure of substantially more road miles - on the order of dozens of miles - to achieve the increased security. The Record should be adjusted to adopt these or similar road management actions.)

Implement seasonal motorized access restrictions during critical periods (e.g. calving season and hunting season) in areas identified as important elk security zones. Seasonal closures (using gates or barricades) can effectively reduce disturbance without permanently eliminating access, and were specifically mentioned in our comments and by other stakeholders as tools to improve elk security .

Ensure enforceable and monitored closures. Roads slated for decommissioning or closure should be clearly delineated in the final decision, with a commitment to physically close them (e.g., earthen berms, gates, signage) prior to or concurrent with project implementation. The Forest Service should also monitor compliance with closures and the resultant elk habitat use to verify that security is in fact improved.

By adopting these measures - all of which were within the range of alternatives considered (especially Alternative 5) - the Forest Service can bring the project into alignment with its Purpose and Need and applicable forest plan requirements. The result would be a project that meaningfully improves elk security and distribution on the forest (as intended), rather than one that simply maintains a status quo that has been deemed inadequate . We believe these steps are reasonable, supported by the analysis, and squarely within the Forest Service's authority to implement in the Record of Decision.

Issue 2: Vegetation Treatment Prescriptions and Reseeding Timeline Concerns

Explanation of Objection: TRCP supports active forest management to restore habitat diversity and forest health; however, we are concerned that certain vegetation treatment prescriptions in the Ellis Project may be too intensive in terms of canopy reduction, potentially undermining wildlife habitat values. In particular, the FEIS indicates that in some units the residual tree retention levels (basal area) would be extremely low. For example, we understand that "dry" forest units could be cut down to 30-60 square feet of basal area per acre, and in some

"moist/cool" forest stands the retention could be as low as 10-20 square feet per acre . Retaining only 10-20 sq. ft. BA/acre (which is essentially only a few large trees or widely spaced clumps) approaches a clearcut condition and would remove the vast majority of hiding cover and thermal cover for wildlife in those stands . Such aggressive thinning may create short-term forage flushes, but without nearby cover, elk and other big game are unlikely to make use of that forage during daylight hours. In our comments, TRCP cautioned that habitat improvements must find the right balance of forage and cover; creating large expanses of forage with no adjacent cover is counterproductive for big game species. We object that the selected alternative's vegetation prescriptions do not clearly ensure retention of sufficient cover elements (trees or dense patches) within treatment units, especially those adjacent to or within identified elk security areas. The project's wildlife habitat improvement goal cannot be met if treatments eliminate too much cover in the name of forage production.
Additionally, TRCP is concerned with the timeline and commitment for post-treatment site restoration, including reseeding of disturbed areas. The project will involve numerous connected actions such as temporary road construction, log landings, and fuel reduction activities that disturb soils and vegetation.
The FEIS discusses reseeding with native grasses/forbs and planting shrubs (which we agree are beneficial actions), but it is not explicit about how quickly these sites will be rehabilitated. Delays in reseeding or insufficient restoration effort could lead to proliferation of invasive weeds, erosion, and a longer-term deficit in forage production (ironically undercutting the project's objective to improve forage). For example, temporary roads and skid trails, if left unreclaimed for multiple seasons, often become vectors for noxious weeds and provide poor habitat. We raised this issue in our DEIS comments, urging the Forest Service to commit to promptly reseeding and decommissioning temporary roads once they are no longer needed. The FEIS and draft decision, however, do not clearly specify a timeframe or enforceable requirement for this. TRCP finds this lack of specificity problematic. Without a binding commitment to restore disturbed sites immediately after use (or at least within the same growing season), there is a risk that habitat degradation (weed spread, loss of topsoil, lack of new forage establishment) will occur in the interim.
Recommended Remedy for Issue 2: TRCP requests that the final decision be modified to address these vegetation management and restoration concerns as follows:
Adjust Thinning Prescriptions to Retain Adequate Cover: In units slated for commercial thinning, fuels reduction, or timber harvest, ensure that prescriptions leave a higher minimum basal area or density of trees in areas important for wildlife cover. We recommend setting a floor on residual basal area that is higher than the extremely low levels analyzed. For example, rather than 10-20 sq.ft./acre in moist forests, the decision could require retaining at least 40-60+ sq.ft./acre in patches, or leaving clumps of mid-story vegetation un-thinned, to serve as cover habitat. If certain units currently lack any cover retention requirement, the decision should incorporate one. The Forest Service should also consider buffering riparian areas, meadows, and travel corridors with extra cover (i.e., lighter thinning or no treatment strips) to facilitate wildlife movement and bedding. These adjustments are in line with the project's wildlife objectives and can be made without fundamentally altering the overall harvest volume or fuels outcomes of the project. They simply ensure habitat heterogeneity - a mix of open forage areas and nearby cover - rather than creating large uniformly open stands.
Require Timely Reseeding and Site Rehabilitation: The Record of Decision should clearly commit that all temporary roads, landings, and other heavily disturbed sites will be decommissioned and reseeded with native vegetation immediately after use, preferably in the same season of disturbance. The FEIS already contemplates native grass seeding and shrub planting; the key is to make these actions an enforceable part of the decision with a specified timeline. We also ask that the Forest Service monitor these reclaimed areas for invasive species and success of revegetation, and commit to follow-up treatments (e.g., weed control, additional seeding) as resources permit.
Implementing the above remedies will help strike the appropriate balance between forest restoration and wildlife habitat needs. TRCP believes that with modest adjustments to thinning intensity and a firm commitment to rapid site rehabilitation, the Ellis Project can deliver sustainable habitat improvements (enhanced forage and sufficient cover), rather than inadvertently creating large open areas that wildlife cannot effectively use. These changes are well within the scope of the FEIS analysis and respond directly to the concerns we raised during the comment period.
Issue 3: Protection of Sensitive Aspen Stands and Other High-Value Habitats

The Ellis Project includes treatments aimed at benefitting quaking aspen stands - a key habitat component for biodiversity - by removing encroaching conifers and using fire or cutting to stimulate aspen regeneration. TRCP supports the intent to restore aspen, as healthy aspen stands provide valuable wildlife habitat. However, we object that the draft decision does not sufficiently detail measures to protect regenerating aspen from over-browsing or other damage, which could result in the failure of this restoration effort. Aspen suckers (young shoots) are highly palatable to livestock and wild ungulates (e.g., elk and deer). Without protection, livestock grazing or heavy browsing can quickly eliminate new aspen sprouts, preventing the stand from regenerating successfully. The project documentation indicates that fencing of aspen stands to exclude livestock is contemplated , which we applaud. However, the objection here is that the commitment to fencing and other protective actions is not clearly delineated in the decision, and it's uncertain whether measures will also address browsing by wildlife. Merely cutting conifers around aspen without ensuring the young aspen can survive may hinder these efforts. Similarly, other sensitive habitats like wetlands or riparian areas could be impacted by project activities if not given special protections (e.g., equipment exclusion zones, seasonal restrictions). TRCP wants to ensure that these high-value, sensitive habitats are not only treated but also secured against foreseeable threats that could undermine the project's objectives.

Recommended Remedy for Issue 3: TRCP requests that the objection reviewing officer require the final decision to incorporate explicit protective measures for aspen stands and other sensitive habitats, such as:

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Enforce Aspen Exclosures: For each aspen stand treated, the Forest Service should commit to installing temporary fencing around the stand (or otherwise excluding cattle from the area) for a sufficient period (we recommend at least 3-5 years) until aspen regeneration is well-established above browse height. If fencing is not feasible in certain locations, an alternative could be to implement a grazing deferment in the pasture/allotment covering that project area for a set number of years post-treatment. The decision should clearly specify this requirement so that it is enforceable (e.g., as a condition in grazing permit administration or through an order).

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Protect Other Sensitive Areas During Implementation: We also request that the final decision explicitly uphold all project design criteria and mitigation measures intended to protect streams, wetlands, meadows, and other sensitive habitats. This includes adherence to equipment buffer distances, seasonal timing restrictions to avoid wildlife nesting/breeding seasons, and rapid rehabilitation of any incidental damage in these areas. While these may already be in the project plan, highlighting and reinforcing them in the ROD would underscore the Forest Service's commitment to safeguarding irreplaceable habitats.

By taking the above steps, the Forest Service will greatly improve the likelihood that aspen restoration efforts and other habitat improvements under the Ellis Project are successful and durable. These measures are reasonable extensions of actions already analyzed (e.g., fencing and planting) and directly address the concerns raised by TRCP's earlier input regarding long-term habitat maintenance.

TRCP fully supports the goals of the Ellis Integrated Vegetation Management Project; improving wildlife habitat and restoring forest health. Our objections center on ensuring that the means chosen to achieve those goals are effective and grounded in the best available science and management guidance. As
described above, the project in its current form would not sufficiently improve elk security and habitat, could degrade certain habitat components through overly aggressive thinning and slow site restoration, and might fall short in protecting sensitive aspen stands. These are not intractable problems; they can be remedied with the changes and commitments we have outlined, many of which draw upon alternatives and mitigations already analyzed in the NEPA process. TRCP respectfully urges the Forest Service to adopt these remedies in the final decision. Implementing our recommendations will help ensure the Ellis Project truly meets its Purpose and Need by providing higher-quality, well-distributed habitat that will hold elk on the forest, while also producing timber and accomplishing fuel reduction in a sustainable manner. This approach aligns with the Forest Plan, scientific research, and the expectations of the hunting and conservation community.

We hereby request a resolution meeting or call with the reviewing officer and project team to discuss these objections and potential solutions. TRCP is committed to working with the Forest Service and other stakeholders to resolve our concerns. We believe that through the objection resolution process, we can find a path forward that improves the project for wildlife and is acceptable and beneficial to all parties. We request to participate in any

objection resolution meetings and ask that the Forest Service contact us to schedule such discussions.

Thank you for your consideration of our input and for your diligence in managing our public lands. We appreciate the Forest Service's recognition of the importance of elk habitat and the steps taken so far to address it. With the additional adjustments we've proposed, we are confident that the Ellis Project can set a positive example for habitat-driven forest management. TRCP looks forward to continuing our constructive engagement as this process moves toward a final decision.

Respectfully,

Tristan Henry
Oregon Field Representative
Theodore Roosevelt Conservation Partnership