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Comments: VIA: <https://www.fs.usda.gov/r06/umatilla/projects/41350>

July 18, 2025

Eric Watrud, Forest Supervisor

Umatilla National Forest

RE: Ellis Integrated Vegetation Project Objection

Dear Supervisor Watrud:

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council files an objection to the proposed draft decision for the Ellis Integrated Vegetation Project (Ellis). Heppner District Ranger, Douglas McKay, is the responsible official. The Ellis Project occurs on the Heppner and North Fork John Day Districts on the Umatilla National Forest.

Objector

American Forest Resource Council

AFRC is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, California and Nevada. 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. Many AFRC members in central and eastern Oregon are approximately 95 percent dependent on raw materials procured from public lands to run their businesses.

Objector's Designated Representative

Irene Jerome, AFRC Consultant

The content of this objection below is based upon the prior specific written comments submitted by AFRC in response to the Draft EIS which are hereby incorporated by reference. AFRC's comments in response to the Draft EIS urged the Forest to maximize noncommercial, precommercial and commercial thinning operations on the Ellis landscape and the issue of leaving all Douglas-fir and grand fir trees greater than 21 inches in diameter regardless of location and health. In those written comments we stated the following:

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 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. We recognize that the urgent need to reduce fuels and improve ecosystem health in a timely manner complicates the Forest Service's ability to consider a project specific forest plan amendment to remove specific trees 21 inches and greater as needed to meet silviculture objectives. However, leaving all these trees in the overstory

compromises present and future stand compositions and does not allow the agency to adequately meet the project's purpose and need. AFRC, the Umatilla National Forest, Oregon Department of Fish and Wildlife, Rocky Mountain Elk Foundation, and a scientist from the Forest and Range Sciences Laboratory in La Grande, Oregon participated in two field trips to the Ellis Project and the consensus of expertise supported the removal of 21 inch trees as appropriate.

A briefing paper by Diane Shirley, South Zone Silviculturist, provides a comparison of alternatives and discussion: As a result, grand fir and white fir over 21" DBH could not be removed from stands outside of LOS or from stands within LOS that were below HRV. Many forests avoided harvesting large trees altogether while others signed Forest Plan Amendments that permitted harvest of large trees under special circumstances (Hessburg et al. 2020). The ecological implications were often profound. Grand fir and white fir are prolific producers of seed (a phenomenon often referred to as "seed rain") that germinate and thrive under low light conditions (Huff et al. 1995). Fir seedlings outcompete shade intolerant seedlings such as western larch and ponderosa pine. This impedes efforts to restore these early seral species and to promote the development of open-canopy, fire-resistant, LOS stands that are currently deficit on the landscape, and more resilient to future disturbances. With a warming and drying climatic trend, we are witnessing larger and more intense wildfires, an increase in tree mortality from insect and disease outbreaks, loss of dry forest habitat, and an increasingly homogenous forest landscape (Devine et al. 2012). A diversity of stand types and patch sizes across the landscape provides habitat that is more resilient to disturbance (Hessburg et al. 1999) and serves the greatest variety of wildlife, birds, and plants.

#### Resolution Requested

AFRC requests that the Deciding Official reconsider analysis of Alternative 5 on the Ellis Project to fully meet the project's Purpose and Need.

#### Request for Resolution Meeting

Pursuant to 36 C.F.R. § 218.11, the objectors request to meet with the reviewing officer to discuss the issues raised in this objection and potential resolution. In the event multiple objections are filed on this decision, AFRC respectfully requests that the resolution meeting be held with all objectors present.

Thank you for your efforts on this project and your consideration of this objection. AFRC looks forward to our initial resolution meeting. Please contact our representative, Irene Jerome, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,

Travis Joseph

President