

Help us fight the extreme Ellis timber sale: More than 56,960 acres of heavy logging in one sale!

We need help to defeat the largest timber sale proposed so far in Eastern Oregon under the guise of “restoration” for resiliency and reducing future wild fire severity. Located in the Umatilla National Forest, just west of the town of Ukiah, OR, this enormous timber sale (which could potentially include up to 90,690 acres of commercial logging) could encompass about 60% (for 56,960 acres) to 90% of the 114,834 acre sale area. Such huge timber sales with intensive logging are the consequence of the Forest Service’s “accelerated scale and pace of restoration” through logging based on propaganda playing on the public’s fear of wild fire and rural communities profiting from heavy logging on public lands wanting a return to the “good old days.” Gullible or self-interested collaborators in Forest Service-steered collaborative groups have promoted such sales as “win-win” solutions. However ecologically destructive timber sales such as Ellis represent long-term losses of vital forest structure needed to provide high quality wildlife habitat and to slow climate change through carbon sequestration. Proposed commercial logging intensity has been increasingly extreme, and the Ellis sale is no exception in pushing the limits of ecological integrity.

We have been objecting to very low basal area retention of only 40 to 60 square feet of basal area per acre proposed for the low end of tree retention in numerous collaborative group-approved timber sales. 40 to 60 square feet of basal area after logging looks like a clearcut with only widely spaced mature seed trees or a “shelterwood” clearcut with small clumps of mostly small trees. The Ellis timber sale would take forest removal even further by proposing “dry” forest retention rates of only 30 to 60 square feet of basal area; with the lower range down to only 20 square feet of basal area retained for naturally denser cold forest in a range of 20-80 square feet of basal area per acre; and with the astonishingly low retention down to only 10 square feet of basal area for naturally more productive, denser cool moist forest in a range of 10 to 90 square feet of basal area per acre. The Forest Service does not guarantee that any mid-range number of square feet of basal area would be retained overall for any of these forest types, so overall forest retention could be extremely low. These low basal area retention ranges correspond with Forest Service intention to log a lot of mature trees (with no mention of a size limit so far.)

The Ellis sale area overlaps multiple timber sales that were logged within the last 27 years, a very short rotation for commercial logging that is not supported by ecological science. Among the past timber sales in the same area that Blue Mountains Biodiversity Project staff and volunteers have field surveyed are the large 1992-1993 East End sale overlapping most of the Ellis project’s west half in the east end of the Heppner District, which we reduced from a proposed 55 million board feet to 5 million board feet, and a sale covering the west end of the North Fork John Day Ranger District in a later year that encompasses most of the east half of the Ellis sale, which we managed to reduce somewhat. The Ellis sale may also overlap part of the Sunflower-Bacon sale in the Southeast side on the Heppner District, some recent small sales, and timber sales prior to 1991. By comparison, the Weyerhaeuser corporation used to consider a 150-year rotation for clearcut timber sales reasonable, then 65 years, then 45 years. So the

Forest Service appears to be less concerned about long-term forest sustainability than even the timber industry, encouraging a downward spiral toward forest ecological collapse.

The Ellis sale also proposes an undefined acreage of clearcutting. The scoping letter defines proposed “regeneration harvest” (clear-cutting) as occurring “when the stand is mature and the harvest leads to the establishment of a new stand.” The scoping letter identifies “triggers for potential regeneration harvest” as “high levels of dwarf mistletoe infestations; greater than 30% canopy loss from root disease; or even aged stands of Lodgepole pine exceeding 80 square feet of basal area/acre with successful pine beetle attacks.” This neatly allows for clearcutting in all the identified forest types. Never mind that all of these “triggers” are natural disturbances that allow for forest self-thinning with no logging impacts, which play critical roles in wildlife habitat niche creation and nutrient cycling. There is no ecologically sound justification for clear-cutting, which does not mimic the effects of stand replacement wild fire as it removes most of the live trees, snags, and logs, depleting soil nutrients and eliminating most carbon sequestration capability on the site. Clearcutting also is generally followed by herbicide use and mechanical grinding up of regenerating shrubs, and by replanting of even age monoculture plantations instead of the more variable density and ages of post-wild fire forest regrowth. The Ellis project area is already dominated by two stand replacement recovery stages: “stand initiation” and “understory re-initiation” due to past clearcutting, heavy logging, and wild fire. Thus forest stages growing back from heavy forest removal are over-represented, suggesting a need to refrain from logging any more mature or large trees, and to give all these young stands a chance to grow into mature and old forest.

The Ellis project includes a variety of more acceptable kinds of management but based on the high acreage of heavy commercial logging proposed, it is clear that the real over-riding purpose is not restoration or wild fire reduction, but forest structure removal for private corporate profit. The Blue Mountains National Forests, including the Umatilla, are being directed by the Trump, Inc. administration in Washington, D.C. to at least double the logging volume. To make Ellis look like a “restoration” project, the following actions are proposed: small diameter tree thinning; firewood and post and pole cutting; aspen stand, meadow, and shrub steppe “enhancement” (cutting “encroaching” conifer trees); improving hydrologic functioning of stream channels and wet meadows (using wood cut nearby); prescribed fire and pile burning; fencing aspen stands to keep out livestock; shrub planting and native grass seeding (an indicator of very heavy logging planned); proposed road closures of 30 to 100 miles of open roads (ostensibly for elk, but also used on the Umatilla to hide clearcuts from the public); water developments for cattle; pasture division fencing for cattle; thinning and burning along the Blue Mountain Scenic Byway “to create vistas and improve sight distances for traveler safety” and thinning in campgrounds “to reduce fuels, improve safety, and enhance views.”

The commercial logging is claimed to “improve culturally significant resources” such as by theoretically improving forest health and vigor and improving wildlife habitat. Commercial logging is also being justified as reducing the “risk” of “undesirable” wildfire, despite growing scientific evidence to the contrary. Actually, many recent studies have emphasized the positive ecological roles of wild fire, including stand replacement fire. Scientific studies have identified significant ecological process disruption from wild fire suppression, a substantial deficit in wild

fire compared to historical conditions, no recent increase in wild fire intensity and size, and have found that mature unlogged forests don't burn as intensely as logged forests. Further, recent studies have found that it is unlikely that fuel reduction would have any effect on future wild fire severity, and that the only effective way to protect houses and other structures is to fire-proof the area immediately around the building (create defensible space) and fire-proof the building itself, such as by installing a metal roof and clearing gutters. Scientists have also identified logging as the second biggest cause of climate change and have found that people just can't stop wild fires in severe weather conditions such as droughts with high air temperatures, low humidity, and high wind speeds. Logging does not produce a net increase in carbon storage even compared to wild fire. To see the details and science citations for these findings visit the John Muir Project website.

In addition to the 56,960 acres of theoretical fire "risk" reduction in the so-called "ember reduction zone" of the Ellis area, the Forest Service has also delineated an 8,960 acre "low intensity zone" within a quarter mile of structures for lower limb pruning on trees in addition to the heavy logging planned. Commercial logging would additionally occur on up to 33,730 acres (283 miles) of road and trail corridors 300 to 500 feet from either side of the roads or trails, along with small diameter thinning, burning, and pruning. This is planned even though fuel breaks have already been created on either side of Forest Service road 53, the Scenic Byway. Roadside hazard trees would be logged for commercial value or felled and left in riparian areas.

Please help us show public opposition to this disastrous timber sale. For a copy of the scoping letter, call or email Elizabeth Berkley (Forest Service) at 541-278-3814 or elizabethberkley@fs.fed.us or check the Umatilla National Forest website for the "Ellis Integrated Vegetation Project Proposal."

We are making the following comments and invite you to consider these points for your comments:

We are opposed to:

*such an enormous timber sale *such heavy logging down to very low basal areas *any clearcutting *any logging or roading in roadless and undeveloped lands *such intensive management of nearly the entire project area *any logging in late and old forest structure, including designated Dedicated Old Growth Areas and Replacement Old Growth Areas *any logging of trees equal to or greater than 15" dbh *any use of Forest Plan amendments to effectively violate Forest Plan standards *any logging within Riparian Habitat Conservation Areas *any new road construction *any opening of closed roads not being maintained for motorized use *toxic herbicide use on Ventenata grass (which is proposed), as it could likely poison other native grasses where it grows *such big fuel breaks along roads and trails

We are concerned by potential impacts of the Ellis project to:

*ecological integrity and biodiversity *forest structural complexity *the already great deficit in mature and large trees in the area compared to historical conditions *Pileated woodpecker and American marten suitable habitat *possible Pacific Fisher habitat *suitable habitat for Lewis' woodpecker and White-headed woodpecker (old wild fire burned forest) and Blackbacked

woodpecker (recent wild fire burns) *suitable habitat for Three-toed woodpecker (mature Lodgepole pine forest) *carbon sequestration to slow or lessen climate change impacts *aquatic and riparian habitat, including impacts to fish species listed under the Endangered Species Act, Sensitive Redband trout, Sensitive Columbia Spotted frog, and Sensitive salamander, mussel, and macroinvertebrate species *elk and deer security cover, including forest thermal and hiding cover * Sensitive and rare plants *recreational values * Neotropical migratory songbirds *Soil productivity and integrity

We suggest scrapping this over-management project entirely or adopting a “restoration only” action alternative with no commercial logging.

Written comments on the Ellis Integrated Vegetation Project can be:

submitted by fax: (541) 676-2105

or mailed to: Brandon Houck, ATTN: Leslie Taylor, P.O. Box 7, Heppner, OR 97836

or be submitted electronically on the Umatilla National Forest’s project webpage:

<https://www.fs.usda.gov/project/?project=41350> by selecting the “Comment on Project” link in the “Get Connected” group at the right hand side of the project webpage. Include the project name in the subject line. Attachments may be in .txt, .rtf, .doc, .docx, or .pdf.

Please support our work with Blue Mountains Biodiversity Project by sending in your comments, responding to our other action alerts, volunteering to help field survey the Ellis sale this next summer, or contributing donations to cover expenses or in-kind donations for our field work such as cameras, binoculars, compasses, forestry dbh tapes, and organic food and teas. We need pro bono assistance from lawyers and law students for potential litigation on timber sales and herbicide use plans.

Send donations to Blue Mountains Biodiversity Project, 27803 Williams Lane, Fossil, OR 97830

Call Karen Coulter to volunteer in our field surveying at (541) 385-9167 & be sure to leave your name and phone number.

Thank you!