



State of Oregon
WALLOWA COUNTY
BOARD of COMMISSIONERS
101 S. River Street #301
Enterprise, Oregon 97828

541-426-4543 ext #1130
Fax: 541-426-0582
Email: commissioners@co.wallowa.or.us

COMMISSIONER JOHN HILLOCK
COMMISSIONER TODD NASH
COMMISSIONER SUSAN ROBERTS

March 15, 2023

District Ranger Brian Anderson
U.S. Forest Service Wallowa Mountains Office
201 E 2nd Street
Joseph, OR 97846

Dear Brian,

The Wallowa County Commissioners, with the advice of the Natural Resources Advisory Committee, offer our reactions to the Morgan Nesbit Forest Resiliency Project "Notice of the Proposed Action."

We agree with the agency's assessment that the Morgan Nesbit area is a high-priority for reducing fuel loads and recommend fuels treatment strategies for every acre within the project. The 2019 Oregon Governor's Council on Wildfire Response Report suggests that strategic treatments across 40 percent of a landscape can significantly alter fire behavior.

Previous projects, such as the Lower Joseph Creek Vegetation Restoration Project, analyzed landscapes, but used a spot-treatment approach for projects. To restore the role of natural fire in the Morgan Nesbit area, landscape-wide treatments are needed. We encourage the agency to strategize large treatment areas, even if the work is beyond current staffing capacity. The Wallowa County NRAC is ready to assist where we can with inventory and monitoring so landscape treatments can be prescribed and completed.

We advise using at least a 20-year timeframe for implementation and prescribe multiple entries, when needed. Technologies and markets will change over this period, so avoid prescriptions that are overly specific to one type of machinery or method.

We would like the Forest Service to consider the local economy and recreation values as the interdisciplinary team develops the project. This area is important for accessing food sources such as roots, berries, mushrooms, mule deer and elk, and is a popular area for camping and off-road recreation. Its proximity to the communities of the Wallowa Valley also make it an important area for firewood gathering, a necessary source of heat for many people in our county.

We would also like to see the project designed to bring benefit to the community's economy from the harvested logs and fuels reduction work. The 2016 Wallowa County Forest Management Plan identifies 209,950 acres on the Wallowa Valley and Eagle Cap Ranger Districts and 39,000 acres on the Hells Canyon National Recreation Area as available, capable, and suitable for timber production. From these acres, timber harvests should occur on 12,448 acres with an estimated 40 million board feet being removed annually.

Morgan Nesbit Proposed Action

Need: "...this area is less resilient to severe impacts from wildfire, insects, and disease."

We are concerned about forest ecosystem health – fir and pine stands are becoming more at risk to pandemic insect outbreaks and diseases with the stress of hotter, drier summers. These deteriorating conditions affect fish and wildlife, as well as soil health. We believe treatments, as proposed, can help reset natural processes and increase groundwater and stream levels.

Purpose: "...to move forest conditions, including structure, density, and species composition towards the historic range of variability and desired conditions."

We understand that many of the Blue Mountains forests are overstocked with grand fir, especially in dry sites. We believe the proposed commercial logging, thinning, and prescribed fire planned for Morgan Nesbit can restore forest stands to their "historic range of variability", and would set them up for the next century, for which the climate is predicted to get hotter, drier and windier.

By removing much of the small diameter, encroaching conifers, more drought resilient species like ponderosa pine, western larch and Douglas fir can dominate the landscape as they did historically. Reducing competition for water and nutrients will allow large trees to continue growing larger.

The goal stated in the scoping letter speaks to "sustainable ecological functions and processes". We support the Forest Service's plan to restore ecological functions and promote riparian hardwood stands by removing encroaching conifers in Riparian Habitat Conservation Areas. We were strong proponents of similar treatments on the Lower Joseph Creek project and believe restoring hardwoods is important to wildlife and soil conditions.

The scoping letter states, "The Big Sheep-Grossman stand, adjacent to Big Sheep Creek, is highly departed from HRV and is at high risk of a high intensity stand replacement fire. This site also retains some large ponderosa pine, has high intrinsic potential for anadromous fish, and provides quality wildlife habitat due to habitat variability."

Besides the high wildfire risk to the Big Sheep-Grossman stand, adjacent timber stands, grazing pastures, recreation sites, and private land are also at risk. In addition, treatment in this stand would protect values at risk like large ponderosa pines and anadromous fish habitat.

We support the Forest Service's "incorporation of the *Large Tree Eastside Screens Amendment*, intended to benefit healthy, large, early seral trees such as ponderosa pine and western larch," and agree that situational removal of grand fir up to 30 inches DBH would remove shade tolerant understory trees that may act as ladder fuel during a wildfire. Removal of selected grand fir up to 30 inches DBH would also provide more light for the development and release of tree seedlings, promote the growth of shrubs, forbs and grasses, and allow snow to reach the ground, eventually melting and contributing to the groundwater.

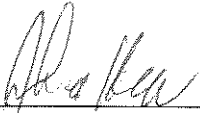
We agree with proposal to create wide shaded fuel breaks along ridgetops and adjacent to roads 3930 and 3935. These breaks reduce threats from human-caused wildfire while improving firefighting efforts until a more natural fire regime can be established.

We support the Forest Service's proposal to use five-acre patch cuts, combined with post treatment prescribed burning and noncommercial thinning, to promote early seral species and remove diseased trees while retaining healthy, drought tolerant species with the stand.

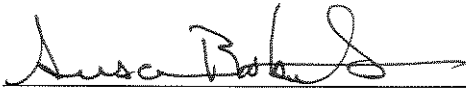
Irregular Shelterwood Regeneration Harvests – we support this treatment to remove trees that out-compete early seral species. This treatment would allow the stands to reach their desired condition – multi-age, healthy trees that provide good habitat and forage.

And finally, we recommend limiting no-treatment areas to discrete islands that have a chance of survival if surrounding areas burn. Every decision to delay treatment for some future project is a decision that increases the risk that these special habitats will be consumed by high-intensity wildfire.

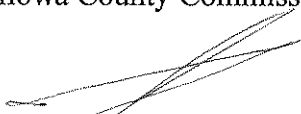
We look forward to continued engagement throughout the planning and implementation of the Morgan Nesbit Forest Resiliency Project.



John Hillock
Wallowa County Commissioner



Susan Roberts
Wallowa County Commissioner



Todd Nash
Wallowa County Commissioner