Juniper Group Sierra Club
c/o Environmental Center
16 NW Kansas Avenue
Bend, OR 97703

27 March 2023

To:
Brian Anderson
Wallowa Valley District Ranger
PO Box 905
Joseph, OR 97846

Regarding: Morgan Nesbit Forest Resiliency Project, scoping, https://www.fs.usda.gov/project/?project=58961

District Ranger Anderson:

The Sierra Club and its Juniper Group, representing over 2000 members in Eastern Oregon counties, is responding to the Wallowa-Whitman National Forest (WWNF) request for comments on Morgan Nesbit Forest Resiliency Project.

This is a very large project of over 86,500 acres across several watersheds and including 38,000 acres of Hells Canyon National Recreation Area and adjoining the Eagle Cap Wilderness. As many of us recreate in this area, we are very concerned over the scope of this project and the cumulative effects over time on the project area and adjoining natural areas.

At this scoping stage of the project, we have some detailed and some broader comments that we may add to when the draft EA or EIS comes out.

Clarification Request

The scoping document, “Notice of Proposed Action”, seems to use these terms interchangeably: “historic reference conditions”, “historic range of variability”, “historic range percentage”, and “desired conditions”. Please be clear in the draft EA or EIS what is meant by each of these terms. A clear description of the final desired condition of this large landscape is required for proper comments, proper project implementation, and followup monitoring.

Additional Materials Request

There are several documents described in the scoping document that we request be provided in supporting materials before or with the draft EA or EIS:

- As these are used to provide direction for this project, the 1990 Wallowa-Whitman Land and Resource Management Plan (Forest Plan), as amended by the 2003 Hells Canyon National Recreation Area Comprehensive Management.

- The report and analysis used to provide the historic range of variability (HRV) values that are used in the scoping document.
- Maps that show the end conditions of the forest upon completion of this project, in terms of the range of tree species, tree density, and forest structure.
- Maps that show the end desired condition of the forest that this project is setting the direction for. That is, what will the range of tree species, tree density, and forest structure be at what point in the future if this project is successful?

Unsupportable Purpose

The Sierra Club cannot support the purpose of this project which is stated as (p. 2):

> The purpose of this project is to move forest conditions, including structure, density, and species composition towards the historic range of variability and desired conditions.

The use of HRV as described here and elsewhere in the scoping document is counter to current data and science reports. For this letter, we will only reference this one USDA report for your consideration: Millar 2014 (https://srs.fs.usda.gov/pubs/47361).

We do support the stated goal of this project, "to promote forest conditions that support sustainable ecological functions and processes and maintain and enhance wildlife habitat diversity and quality." (p. 2) To achieve this, the WWNF needs to use Future Range of Variability models that account for the ongoing rapid anthropogenic climate change.

National Carbon Goals

The role of WWNF and this specific project in supporting national carbon sequestration and climate fighting goals is not addressed in this project. This project needs to consider carbon sequestration and the importance of leaving all large trees to help achieve national and world goals to reduce the effects of anthropogenic climate change.

National Connectivity Goals

This project area is important to wildlife movement through the Blue Mountains and to regions on all sides, but especially to the West and East. The connectivity provided by wild, natural areas for migration and other wildlife movements is especially important with the changing climate and drought conditions. The Office of the President has directed that agencies consider this in the work they do (https://www.whitehouse.gov/wp-content/uploads/2023/03/230318-Corridors-connectivity-guidance-memo-final-draft-formatted.pdf). Consideration for how this project affects connectivity must be analyzed.

Eastside Screens Amendment

The Sierra Club cannot support the incorporation of the Eastside Screens Amendment in this project as described on p. 7. This amendment runs counter to forest health, as large trees are deficit on the landscape and need to be recruited to restore ecosystem functioning. The argument that removing some

shade tolerant large trees is a benefit in that this “may remove ladder fuel” is weak, unlikely to be a problem, and counter to the natural benefits provided by these large trees. The argument that this will provide more light for seedlings leaves out the problems of greater wind drying of surface plants, less plant support through mycorrhizal networks, less carbon storage, less organic matter for soil building, less habitat for wildlife, and many other impacts on a healthy and complex ecosystem.

Riparian Treatments

Some riparian treatments may help improve conditions, but the emphasis on high-intensity wildfire is overstated. This rare disturbance event is, in any case, a natural event that resets riparian and forest conditions. Riparian systems are noted for reducing the intensity of wildfires due the higher moisture content of soils and plants. This effect is greatly improved by the presence and activity of beavers. This project should include efforts to improve conditions that will attract beaver.

Encroachment by conifers in riparian areas may be a problem if the ecosystem is not functioning as a natural system. Riparian systems are one of the most changing systems in the forest, and subject to more disturbance events because such events include flooding. Conifer competition is reduced by raising the water table through actions that slow stream flows, such as large woody debris and the presence of beaver. Conifer numbers are also reduced by flooding, fire, and hardwood competition.

The proposed treatment of Big Sheep Creek is not supportable when argued in terms of HRV. Meadow enhancement treatments are questionable as meadows naturally form from disturbance events and then fill in again with trees over time. Leaving natural plant succession to progress without treatment is a supportable alternative.

Steep Slope Treatments

We appreciate that hand treatment on slopes >30% is proposed rather than mechanical treatment, as mechanical treatment exasperates problems with soil compaction, scraped channels for erosion, and overall vegetative damage to non-target species (such as herbs and shrubs). We remain concerned about how any treatment of steep slopes generally increases erosion, loss of soils, increased stream turbidity, and vegetative damage.

We recommend no treatment of steep slopes. This will prevent habitat damage and will also increase wildlife security habitats.

Shaded Fuel Breaks and Roads

Roads and shaded fuel breaks fragment habitats and open the forest to abuse by users seeking easy or motorized access. We support physically closing roads and not creating fuel breaks. Using prescribed fire is a good alternative to fuel breaks, as this treatment can be done at times that reduce the spread of wildfire.

Temporary roads (23 miles or more in this scoping document) are a problem in that they scar the landscape and disturb the soil and vegetation. While WWNF may attempt to close these roads, the scar remains and is often used by users who do not respect the closure. User created roads along closed road

scars and other areas remain a problem for wildlife disturbance, habitat fragmentation, and sources of wildfire ignition.

We recommend no new road creation, even temporary roads. The WWNF already has a high density of roads across the landscape.

Summary

We may find other problems when the draft EA or EIS is available. We hope our concerns and alternatives as presented above for this scoping proposal will influence your work, and will result in WWNF management decisions that benefit the many users of this forest ecosystem, as well as the extremely important flora and fauna that together make this a viable, resilient ecosystem. The strength and beauty of the mountains, streams, forests, and grasslands of this area are an irreplaceable asset to us all.

Sincerely,

/s/ Mathieu Federspiel
Juniper Group Executive Committee
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