VIA: https://www.fs.usda.gov/project/?project

March 30, 2023

Brian Anderson, District Ranger
Wallowa Mountains Ranger District
P.O. Box 905
Joseph, OR 97846

RE: Morgan Nesbit Notice of Proposed Action and Scoping Comments

Dear Mr. Anderson:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide comments on the Morgan Nesbit Project. The Morgan Nesbit project area is located approximately 20 miles southeast of Joseph. Administratively approximately 48,500 acres are on the Wallowa Valley Ranger District of the Wallowa Whitman National Forest and 38,000 acres are within the Hells Canyon National Recreation Area. This area is critical for the citizens of Wallowa County and important to AFRC members.

AFRC is a regional trade association that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, and California. 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 Morgan Nesbit Project will, if properly implemented, benefit AFRC's members and help ensure our public lands are better prepared to withstand wildfire and provide public timber in an area where that commodity is greatly needed.

Purpose & Need

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 goal is to promote forest conditions that support sustainable ecological functions and processes and maintain and enhance wildlife habitat diversity and quality. In addition to reducing densities and promoting desirable species, the Forest Service is proposing to protect adjacent private lands and infrastructure (e.g., electrical utilities and range improvements) by providing firefighters safer

options for fire suppression and to provide wood fiber and forest products (sawtimber, mushrooms, berries) to support local economies and community wellbeing. AFRC appreciates recognition of the importance of providing wood fiber as a part of this project and we urge you to take a hard look at the stands in this planning area and treat as many acres as possible. The remote location combined with the condition of the road system make accessing this area economically challenging.

AFRC is pleased to see the Wallowa Valley Ranger District proposing vegetation management on their lands that will likely provide useful timber products to our membership. Our members depend on a predictable and economical supply of timber products off Forest Service land to run their businesses and to provide useful wood products to the American public. This supply is important for present day needs but also important for needs in the future. This future need for timber products hinges on the types of treatments implemented by the Forest Service today. Of particular importance is how those treatments effect the long-term sustainability of the timber resources on Forest Service managed land. AFRC has voiced our concerns many times regarding the long-term sustainability of the timber supply on Forest Service land and how the current management paradigm is affecting this supply. We are pleased to see the District proposing regeneration harvest in the form of patch cuts and irregular shelterwood regeneration harvests. Treatments beyond thinning are critical to ensuring the long-term sustainability of the Wallowa Whitman's timber supply. While we fully appreciate that many objectives drive silviculture prescriptions, there is still a critical need to maintain the forest products industry so that these areas can be treated when the need arises, such as with Morgan Nesbit.

Technical reports from both 2010[1] and 2012[2] completed for the Forest Service determined, among other things, that:

- The forest products sector helps sustain the social, economic, and ecological benefits of forestry in the United States.
- Product revenues sustain economic benefits that include jobs and income.
- Ecological and social benefits can be supported by timber revenue to landowners that help keep land in forests and by forest treatments that can help maintain ecological functions.
- Wood products fulfill fundamental needs per capita and have remained competitive with alternate means of meeting those needs.
- US lumber production and demand is expected to increase through 2040.

Supporting local industry and providing useful raw materials to maintain a robust manufacturing sector should be a principal objective to any project proposed on Forest Service

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[1] Ince, P.J.; Kramp, A.D.; Skog, K.E.; Spelter, H.N.; Wear, D.N. 2011. *U.S. forest products module: a technical document supporting the Forest Service 2010 RPA assessment.* Res. Pap. FPL-RP-662. Madison, WI: U.S. Department of Agriculture, Forest Service, Forest Products Laboratory. 61 p.

[2] Skog, Kenneth E.; McKeever, David B.; Ince, Peter J.; Howard, James L.; Spelter, Henry N.; Schuler, Albert T. 2012. *Status and Trends for the U.S. Forest Products Sector: A Technical Document Supporting the Forest Service 2010 RPA Assessment.* General Technical Report FPL-GTR-207. Madison, WI: U.S. Department of Agriculture, Forest Service, Forest Products Laboratory. 35 p.

land, particularly those lands designated as General Forest. As the Forest Service surely knows, the "restoration" treatments that are desired on these public lands cannot be implemented without a healthy forest products industry in place, both to complete the necessary work and to provide payments for the wood products generated to permit the service work to be completed.

Design Features

We are pleased to see the District acknowledge flexibilities associated with the Revised Management Direction on the Eastside Screens. No longer being shackled to a diameter limit standard should facilitate treatments on the ground that more effectively meet the desired outcomes explained in the purpose and need.

Operations

The timber products provided by the Forest Service are crucial to the health of our membership. Without the raw material sold by the Forest Service these mills would be unable to produce the amount of wood products that the citizens of this country demand. Without this material our members would also be unable to run their mills at capacities that keep their employees working, which is crucial to the health of the communities that they operate in. These benefits can only be realized if the Forest Service sells their timber products through sales that are economically viable. This viability is tied to both the volume and type of timber products sold and the manner in which these products are permitted to be delivered from the forest to the mills. There are many ways to design a timber sale that allows a purchaser the ability to deliver logs to their mill in an efficient manner while also adhering to the necessary practices that are designed to protect the environmental resources present on Forest Service forestland.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions. As stated above, we understand that the Forest Service must take necessary precautions to protect their resources; however, we believe that in many cases there are conditions that exist on the ground that are not in step with many of the restrictions described in Forest Service EA's and contracts (i.e. dry conditions during wet season, wet conditions during dry season). We would like the Forest Service to shift their methods for protecting resources from that of firm prescriptive restrictions to one that focuses on **descriptive end-results**; in other words, describe what you would like the end result to be rather than prescribing how to get there. There are a variety of operators that work in the Wallowa Valley market area with a variety of skills and equipment. Developing a NEPA document and contract that firmly describes how any given unit shall be logged may inherently limit the abilities of certain operators. For example, restricting certain types of ground-based equipment rather than describing what condition the soils should be at the end of the contract period unnecessarily limits the ability of certain operators to complete a sale in an appropriate manner with the proper and cautious use of their equipment. To address this issue, we would like to see flexibility in the NEPA and contract to allow a variety of equipment to the sale areas. We feel that there are several ways to properly harvest any piece of ground, and certain restrictive language can limit some potential operators. Skyline logging on 1,377 acres is planned for the Morgan Nesbit project, however cable logging infrastructure is extremely limited in eastern Oregon.

Tethered/traction assist systems are becoming more common in eastern Oregon and it is critical that these systems be analyzed for on Morgan Nesbit. Further, fellerbunchers and processors can be very effective on steeper ground and allowing their use throughout these units can greatly increase its economic viability, and in some cases decrease disturbance and damage to the residual stand as well as provide a more even distribution of woody debris following harvest.

The effectiveness of harvesting and yarding low volume per acre on steep slopes is a significant obstacle to implementation. We urge the District to explore ways to secure access to these acres that would facilitate conventional yarding. This includes road construction, temporary or permanent. The weight displacement provided by tethering allows tracked equipment to operate on steep ground with limited soil displacement or compaction. Standard psi levels for that tracked equipment are transferred to the tethering uphill. Other Forests in the Region have permitted this equipment to be used on Forest Service thinning stands on slopes up to 70%. However, while this equipment provides greatly increased flexibility and improved safety conditions with regard to logging steeper slopes, it is critical to remember that it is not a less expensive alternative than traditional cable/skyline logging systems. Please reach out to local industry when developing the contract and appraisal documents to ensure that the commercial volume for removal on Morgan Nesbit is sufficient to create a viable project for implementation.

Green, P. Q., Chung, W., Leshchinsky, B., Belart, F., Sessions, J., Fitzgerald, S. A., Wimer, J. A., Cushing, T., Garland, J. J. (2019). Insight into the productivity, cost and soil impacts of cable-assisted harvester-forwarder thinning in western Oregon. *For. Sci.* 66(1):82–96

Key Point of the Green paper include:

- The use of cable assistance can reduce track coverage and reduce shear displacement, and thus likely lessen potential soil impact caused by forestry machines.

Garland, J., F. Belart, R. Crawford, W. Chung, T. Cushing, S. Fitzgerald, P. Green, *et al.* 2019. Safety in steep slope logging operations. *J. Agromedicine* 24(2):138–145.

Key Point of the Garland paper include:

- Use of new tethered-assist technology reduces exposure to hazards and reduces workers exposed to the most dangerous work in logging—felling and working on cable operations on steep slopes.

Carbon/Climate

Please consider the points below from a technical report by the Climate Change Vulnerability Assessment and Adaptation Project (SWOAP) in Southwest Oregon.

- Wood harvested from the forest, especially timber used for durable structures, can be reservoirs of long-term carbon storage (Bergman et al. 2014).

- Forests and their products embody a closed-loop system in which emissions associated with harvests and product use are eventually recovered as forests regrow.
- Although products may be retired in solid waste disposal sites, they decompose quite slowly, causing carbon to continue to be stored for many decades.
- Products derived from the harvest of timber from national forests reduce carbon emissions by substituting for more energy-intensive materials including concrete, steel, and plastics.

Please see the graph below from the IPCC (2007) that captures the ability of forests to "stack" carbon sequestration and storage through continual harvests. **Please consider adopting this graph into the Morgan Nesbit project analysis.**

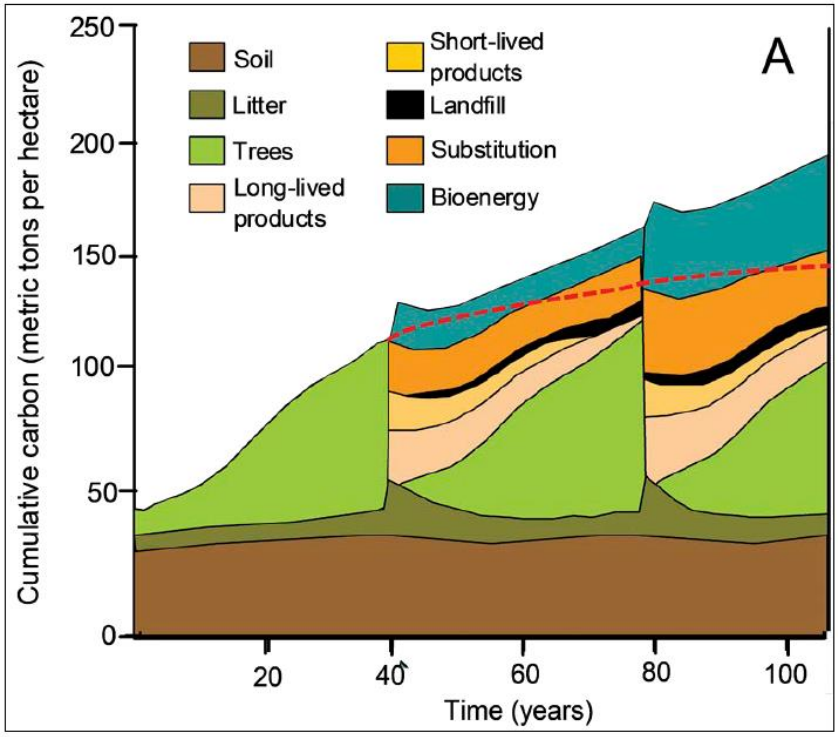

Figure 8.7—Carbon balance from a hypothetical forest management project in which the forest is harvested roughly every 40 years from land that started with low forest carbon stocks. This figure accounts for forest regrowth and carbon stored in wood products in use and landfills as well as the prevented release of fossil fuel carbon (also counted as stored carbon) via product substitution and biomass energy. It illustrates how forests can continue to accrue carbon over time with forest management. Figure is from McKinley et al. (2011) and adapted from IPCC (2007).

We believe that this graph encapsulates the forest management paradigm that would be most effective at maximizing carbon sequestration on a per-acre basis by "stacking" storage in wood products and regrowth of newly planted trees.

We would like to encourage the Wallowa Valley District to consider several documents related to carbon sequestration related to forest management.

McCauley, Lisa A., Robles, Marcos D., Wooley, Travis, Marshall, Robert M., Kretchun, Alec, Gori, David F. 2019. Large-scale forest restoration stabilizes carbon under climate change in Southwest United States. *Ecological Applications*, 0(0), 2019, e01979.

Key points of the McCauley paper include:

- Modeling scenarios showed early decreases in ecosystem carbon due to initial thinning/prescribed fire treatments, but total ecosystem carbon increased by 9–18% when compared to no harvest by the end of the simulation.
- This modeled scenario of increased carbon storage equated to the removal of carbon emissions from 55,000 to 110,000 passenger vehicles per year until the end of the century.
- Results demonstrated that large-scale forest restoration can increase the potential for carbon storage and stability and those benefits could increase as the pace of restoration accelerates.

We believe that this study supports the notion that timber harvest and fuels reduction practices collectively increase the overall carbon sequestration capability of any given acre of forest land and, in the long term, generate net benefits toward climate change mitigation.

Gray, A. N., T. R. Whittier, and M. E. Harmon. 2016. Carbon stocks and accumulation rates in Pacific Northwest forests: role of stand age, plant community, and productivity. Ecosphere 7(1):e01224. 10.1002/ecs2.1224

Key points of the Gray paper include:

- Although large trees accumulated C at a faster rate than small trees on an individual basis, their contribution to C accumulation rates was smaller on an area basis, and their importance relative to small trees declined in older stands compared to younger stands.
- Old-growth and large trees are important C stocks, but they play a minor role in additional C accumulation.

We believe that this study supports the notion that, if the role of forests in the fight against climate change is to reduce global greenhouse gasses through maximizing the sequestration of carbon from atmospheric CO2, then increasing the acreage of young, fast growing small trees is the most prudent management approach.

Gustavsson, L., Madlener, R., Hoen, H.-F., Jungmeier, G., Karjalainen, T., KlÖhn, S., … Spelter, H. (2006). The Role of Wood Material for Greenhouse Gas Mitigation. Mitigation and Adaptation Strategies for Global Change, 11(5–6), 1097–1127.

Lippke, B., Oneil, E., Harrison, R., Skog, K., Gustavsson, L., Sathre, R. 2011 Life cycle impacts of forest management and wood utilization on carbon mitigation: knowns and unknowns, Carbon Management, 2:3, 303-333.

McKinley, D.C., Ryan, M.G., Birdsey, R.A., Giardina, C.P., Harmon, M.E., Heath, L.S., Houghton, R.A., Jackson, R.B., Morrison, J.F., Murray, B.C., Pataki, D.E., Skog, K.E. 2011. A synthesis of current knowledge on forests and carbon storage in the United States. Ecological Applications. 21(6): 1902-1924.

Skog, K.E., McKinley, D.C., Birdsey, R.A., Hines, S.J., Woodall, C.W., Reinhardt, E.D., Vose, J.M. 2014. Chapter 7: Managing Carbon. In: Climate Change and United States Forests, Advances in Global Change Research 57 2014; pp. 151-182.

In the absence of commercial thinning, the forest where this proposed action would take place would thin naturally from mortality-inducing natural disturbances and other processes

resulting in dead trees that would decay over time, emitting carbon to the atmosphere. These are the natural processes that are currently taking place on the Morgan Nesbit Project. Conversely, the wood and fiber removed from the forest in this proposed action would be transferred to the wood products sector for a variety of uses, each of which has different effects on carbon (Skog et al. 2014). Carbon can be stored in wood products for a variable length of time, depending on the commodity produced. It can also be burned to produce heat or electrical energy or converted to liquid transportation fuels and chemicals that would otherwise come from fossil fuels. In addition, a substitution effect occurs when wood products are used in place of other products that emit more GHGs in manufacturing, such as concrete and steel (Gustavasson et al. 2006, Lippke et al. 2011, and McKinley et al. 2011). In fact, removing carbon from forests for human use can result in a lower net contribution of GHGs to the atmosphere than if the forest were not managed (McKinley et al. 2011, Bergman et al. 2014, and Skog et al. 2014). The IPCC recognizes wood and fiber as a renewable resource that can provide lasting climate-related mitigation benefits that can increase over time with active management (IPCC 2000). Furthermore, by reducing stand density, the proposed action may also reduce the risk of more severe disturbances, such as insect and disease outbreak and severe wildfires, which may result in lower forest carbon stocks and greater GHG emissions.

AFRC looks forward to the forward to the implementation of the Morgan Nesbit Project. Please reach out to me if I can be of any assistance to you during the development of this project.

Sincerely,

Irene K. Jerome
AFRC Consultant
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John Day, OR 97845