Via: https://www.fs.usda.gov/project/?project=58961

December 20, 2024

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

Dear Mr. Anderson:

On behalf of the American Forest Resource Council (AFRC) and its members, thank you for the opportunity to provide scoping comments on the Morgan Nesbit Forest Resiliency Project (Morgan Nesbit). The project area is approximately 86,500 acres, located about 20 miles southeast of Joseph, Oregon, in Wallowa County. Administratively, a little over 48,500 acres lie within the Wallowa Valley Ranger District and 38,000 acres within the Hells Canyon National Recreation Area.

AFRC is a regional trade association whose purpose 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. AFRC represents over 50 forest product businesses and forest landowners throughout the West. Many of our members have their operations in communities adjacent to the Wallowa Whitman National Forest and the management on these lands ultimately dictates not only the viability of their businesses, but also the economic health of the communities themselves. The state of Oregon forest sector employs approximately 61,000, with AFRC's membership directly and indirectly constituting a large percentage of those jobs. Rural communities, such as the ones affected by this project, are particularly sensitive to the forest product sector in that more than 50% of all manufacturing jobs are in wood manufacturing.

<u>Purpose & Need—Timber Base</u>

AFRC is pleased to see the Wallowa Valley District proposing integrated 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 affect the long-term sustainability of the timber resources on NFS managed lands. 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. It is important to recognize that lands designated as Timber Production are the only lands where our members can depend on a sustainable supply of timber products, as timber outputs on lands designated as other management emphasis areas are merely a "byproduct."

The timber products provided by the Forest Service are crucial to the health of our membership. At this time, many of our members are an estimated 95 percent dependent on federal logs. 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 Morgan Nesbit project originally planned to remove trees greater than 21 inches at dbh as necessary to meet desired end results informed by the project's purpose and need. Unfortunately, the removal of these trees is not permitted without the use of a project specific forest plan amendment. AFRC ***strongly*** urges the District to pursue a plan amendment on Morgan Nesbit because the desired conditions for the planning area will not be adequately met without the ability to remove some of those trees.

The photo at left, taken on an AFRC/ Forest Service field trip on June 20, 2022 shows the heavy dwarf mistletoe in the Douglas-fir. The large tree at the far right in the photo is larger than 21 inches at dbh and without removal will continue to infect the understory. Creating more snags in this area is not necessary or desirable.

Stands of large young grand fir are also present in this planning area and without the removal of some

of those trees it will be impossible to move these stands toward a more desirable species composition and desired stand density.

The photo at left was also taken on June 20, 2022 on the Morgan Nesbit field trip. This stand is a grand fir/huckleberry type that has not experienced disturbance in many years. The treatment will focus on promoting ponderosa pine and western larch and may require removal of grand fir over 21 inches to meet objectives.

Because of the remote location of this planning area, it will be critical to treat the landscape and create economically viable projects with a single entry. Returning to this area on regular intervals after the initial treatments are complete will not be a viable option.

The primary issues affecting the ability of our members to feasibly deliver logs to their mills are firm operating restrictions and very specific requirements identified in the NEPA documents that later prove to be inappropriate or too inflexible to be adequately implemented on the ground. 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 Mt. Emily market area with a diversity 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 EA 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. Since some of the proposal area is on steeper ground, there may be opportunities to use certain ground equipment such as fellerbunchers and processors in the units to make logging more efficient. Allowing the use of processors and fellerbunchers throughout these units can greatly increase its economic viability, and in some cases decrease disturbance by decreasing the amount of cable corridors, reduce damage to the residual stand and provide a

more even distribution of woody debris following harvest. AFRC appreciates the potential use of tethered-assist equipment being included in the EA.

AFRC and its members share the Forest Service's desire to reduce the threat of catastrophic wildfire through active forest management. In some stands this includes the removal of non-merchantable material. However, markets in eastern Oregon within economical hauling distance that take non-merchantable materials is limited. Local mills are even struggling with how to dispose of residuals generated in their facilities. The EA indicates that there are 7,837 acres of "non commercial" treatments. We presume that there may also be trees of noncommercial size within acres identified as "commercial" in the EA.. We advise the Forest Service to limit the requirement to remove this material in timber sales or stewardship contracts. An alternative could be to cut, skid, and deck this material for disposal at a later time. Such an alternative could include provisions where nonmerchantable material removal is ***subject to agreement*** in whatever contracting mechanism you select.

Prescribed Burning

AFRC supports prescribed burning after commercial, precommercial and noncommercial treatments have been implemented. The large number of acres planned for prescribed burns is concerning due to implementation obstacles. Under what time frame does the District plan to get the 74,840 acres burned in? Why aren't the grasslands in the northeastern portion of the planning area planned for prescribed fire?

Road Decommissioning

An intact road system is critical to the management of Forest Service land, particularly for the provision of timber products. Without an adequate road system, the Forest Service will be unable to offer and sell timber products to the local industry in an economical manner. The road decommissioning proposed on Morgan Nesbit likely represents a ***permanent*** removal of these roads and likely the deferral of management of those forest stands that they provide access to. The land base covered in the project area are to be managed for a variety of forest management objectives. Removal of adequate access to these lands compromises the agency's ability to achieve these objectives and is very concerning to us.

Carbon/Climate

We are pleased to see that the effects analysis of the proposed treatments on carbon stocks and climate change included much of the literature provided by AFRC in our scoping comments. We are also pleased to see the Forest Service acknowledge the role that long-lasting wood products play in climate change mitigation and carbon storage. We strongly believe that active forest management coupled with wood product manufacturing is the optimal approach toward maximizing the potential of our nation's forests in climate change mitigation.

In addition to the literature already cited, we would like to encourage the Wallowa Valley District to consider several additional 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.

AFRC looks forward to the implementation of the Morgan Nesbit Project which is extremely important for many reasons including for the economy of Wallowa County. Please reach out to me if I can be of any assistance to you during the development of this project.

Sincerely,

Irene K. Jerome

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