



VIA: <https://www.fs.usda.gov/project/?=58961>

June 23, 2025

Shaun McKinney, Forest Supervisor
Wallowa-Whitman National Forest
1550 Dewey Avenue Suite A
Baker City, OR 97814

RE: Morgan Nesbit Forest Resiliency Project Objection

Dear Supervisor McKinney:

Pursuant to 36 C.F.R. Part 218.7, the American Forest Resource Council files an objection to the proposed draft decision for the Morgan Nesbit Forest Resiliency Project (Morgan Nesbit). Wallowa Valley District Ranger, Brian Anderson, is the responsible official. The Morgan Nesbit Project occurs on the Wallowa Valley Ranger District on the Wallowa-Whitman National Forest.

AFRC is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, California and Nevada. 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 a reliable supply of public timber in an area where the commodity is greatly needed. Many of AFRC members in central and eastern Oregon are approximately 95 percent dependent on raw materials procured from public lands to run their businesses.

Objector's Designated Representative

Irene Jerome, AFRC Consultant

408 SE Hillcrest Rd

John Day, OR 97845

541-620-4466

ijerome@amforest.org

The content of this objection below is based upon the prior specific written comments submitted by AFRC in response to the Draft EA which are hereby incorporated by reference.

We recognize that the urgent need to reduce fuels in a timely manner complicates the Forest Service's ability to consider a project specific forest plan amendment to remove specific trees 21 inches and greater as needed to meet silviculture objectives. However, leaving them in the overstory compromises present and future stand compositions and does not allow the agency to adequately meet the project's purpose and need.

Eliminating noncommercial/precommercial thinning from wildlife corridors greatly exacerbates the risk of losing these corridors to wildfire as the denser fuels serve as a "wick" for flames. Although implementing these treatments does not provide useful timber products to our membership, it will reduce the risk of high-intensity wildfire, which poses a threat to adjacent commercial units as well as the adjacent forest overall. The Purpose and Need for Morgan Nesbit will not be met without appropriate modifications, as cited above, to the silviculture prescription.

Resolution Requested

AFRC requests that the Deciding Official reconsider a project-specific plan amendment to address removing Douglas-fir and grand fir trees over 21 inches and that wildlife connectivity corridors be noncommercially and pre-commercially thinned to stocking levels that will mitigate extreme fire behavior.

AFRC submitted written comments in response to the Draft EA urging the Forest to maximize noncommercial, precommercial and commercial thinning operations on the Morgan Nesbit landscape and the issue of leaving Douglas-fir grand fir trees greater than 21 inches in diameter.

Request for Resolution Meeting

Pursuant to 36 C.F.R. § 218.11, the objectors request to meet with the reviewing officer to discuss the issues raised in this objection and potential resolution. In the event multiple objections are filed on this decision, AFRC respectfully requests that the resolution meeting be held with all objectors present.

Thank you for your efforts on this project and your consideration of this objection. AFRC looks forward to our initial resolution meeting. Please contact our representative, Irene Jerome, at the address and phone number shown above, to arrange a date for the resolution meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Travis Joseph". The signature is written in a cursive, flowing style with a large initial "T".

Travis Joseph
President