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Comments: Note--I am resubmitting because I do not see my comment I submitted yesterday up yet. This time I will submit both as an attachment and as a letter text--Marina

Marina Richie

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Mr. Brian Anderson

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Thank you for the opportunity to comment on the Morgan-Nesbit "Forest Resiliency Project---covering 87,000 acres from the edge of the Eagle Cap Wilderness and into the Hells Canyon National Recreation Area, including the Imnaha River watershed. This is magnificent country with high biodiversity, tree diversity, multiple natural fire regimes (all important for biodiversity), critical microrefugia for wildlife in a warming climate, and unprecedented values for wildlife migration-only if it remains intact. Many parts of the project area have never seen a chainsaw-an increasing rarity on unprotected lands of the Wallowa-Whitman NF, one of the most heavily roaded forests in the entire National Forest system.

This entire project lies 20 miles southeast of Joseph and far from any Wildland Urban Interface, where wildfires are a concern to communities. This is also the homeland of the Nez Perce, where the tribe has treaty rights and a deep cultural connection that must be honored.

I appreciate your attentiveness to my letter focusing on this nationally and internationally significant area and why I believe this project fails to protect the wildland and wildlife qualities, and in fact will weaken, fragment, and damage this precious and rare stretch of country- pivotal for plant and wildlife migration in a time of accelerating climate change and habitat destruction. While I know this project has been in the works for a few years, it's time to put on the brakes and re-evaluate with an ecological and humble, conservative approach embracing true restoration (discussed later in letter).

Public concern over wildfires is leading to logging far from communities and mostly in ways that are making our western national forests far less resilient in the process. By trying to convert a wide range of forests that have different fire regimes (from low intensity frequent to medium intensity infrequent and to high intensity-some that have evolved not to have fire for more than a hundred years), the Forest Service is weakening-not strengthening- the ability of these forests to survive over the long run in a time of climate change.

The science is clear that the best way to be firewise in a time of increasing high temperatures and fires that burn right through "thinned" forests is to focus on homes and communities at the Wildland Urban Interface. (See the film Elemental).

Who I am

I'm a science and nature writer based in Bend, Oregon, and formerly lived in La Grande. I continue to spend time in the region as a writer, hiker, birder, camper, naturalist, and environmentalist. I have deep connections to Northeast Oregon dating to the early 1980s when I lived in the John Day Valley and spoke up for wildlands and am proud that some were protected under the 1984 Oregon Wilderness Act, yet have worried ever since about the thousands of acres of unprotected roadless lands meriting wilderness protection. This project shows I am right to be concerned.

My 1988 master's degree thesis in journalism focused on environmental issues of the Hells Canyon National Recreation Area. I am providing a link to download my thesis from University of Montana: Troubled Waters, Threatened Forests: Hells Canyon National Recreation Area, because the historical perspective is relevant to the Morgan-Nesbit Project. The journalistic project reflected considerable research and more than 100 interviews. In the abstract, I wrote, "Though the Hells Canyon NRA Act emphasizes recreation, natural resource and scenic preservation, the Forest Service appears to be managing the area little differently from its surrounding forests lacking a special designation." During the NRA's first 12 years (1976-1987), the Forest Service sold 78.6 million board feet of timber-with rationales including "salvage" logging after wildfire and a spruce bark beetle epidemic.

While we have come a long way from high volume logging of that era,, the "emergency" rationales then justifying logging remind me of what's happening today within the NRA and throughout the Wallowa-Whitman NF outside of protected Wilderness. I'm shocked that more than half the commercial logging proposed in Morgan-Nesbitt is within the HCNRA.

Overall Concerns and What True Restoration Looks Like

I have many concerns about the size, scope, and basic assumptions of the project. My number one request is to put this whole project on hold and reconsider the very premise. While I understand the project has been in the works since 2018 at least, this scoping period is ideal for re-evaluating and changing course, especially with much new information available. While it's easy to slow down and re-evaluate, it's impossible to "re-do" after large trees are cut down, soil churned from heavy equipment, and new roads cut into never before roaded areas.

The problem I've seen again and again is that we make things worse not better with projects like Morgan-Nesbitt-and we'd be far better off focusing efforts where restoration is true restoration-like decommissioning and rewilding old roads, fixing and replacing culverts, and selective thinning and planting in old clearcuts that are now monocultures-and doing the latter in small-scale ways with thoughtful ecological planning.

True restoration also means remedying the damages from overgrazing that have weakened our fragile plant communities, caused invasive weed incursions, and damaged riparian areas. Focusing on riparian areas for true restoration means removing livestock, evaluating, and reassessing livestock allotments, planting willows, cottonwoods, etc., and bringing back beavers to store and hold water---using all the techniques that are working well (like beaver dam analogues). Conducting inventories on all the wildlife dependent on riparian areas and knowing their complex life histories is vital to help rather than harm them.

And true restoration means treating the entire Wallowa-Whitman NF in context of the significance of this forest that's at the crossroads of mega-ecosystems and is critical for wildlife and plant migration. Use maps that show where lands are intact and wild, and are key migration corridors for wildlife, fish, and plants. identify the damaged, roaded public lands that could use the most help (in the way of re-wilding as in the above paragraph). Work with partnerships in the region that are emerging and gaining momentum-like the Blue Mountains Trail, led by the Greater Hells Canyon Council.

There's so much to do that's positive and exciting for the Forest Service-and would lead to a much more engaged public-from local hunters, anglers, farmers, hikers, birders, etc. to regional and national supporters. We cannot forget these are public lands and their fate cannot be decided by a handful of local politicians.

Meanwhile, there are far too many assumptions made in this project without supporting data on biodiversity; protecting intact corridors for wildlife and plant migration as the climate crisis accelerates; and carbon sequestration and capture significance of large trees-including grand fir (often targeted for logging and yet critical for wildlife).

There are so many holes in the scoping project and far too people available in the Forest Service to fill them with the necessary inventory and assessment in the field. For example, has anyone looked at the Townsend's Warbler? This neotropical species only does well in never logged Douglas-fir, grand fir, Englemann spruce, and ponderosa pine growing close together in big wild swathes of forest. When the warblers do well, so does the forest-since this species feeds on insects like spruce budworm.

New information is critical for taking another look--like this highly relevant research article from 2020 and authored by several highly esteemed scientists should be pivotal to Morgan-Nesbit and the need to shift course and re-evaluate:

Large Trees Dominate Carbon Storage in Forests East of the Cascade Crest in the United States Pacific Northwest, (Mildrexler et al). The paper specifically addresses the importance of the east side screens, which are under litigation right now. Unfortunately, the Morgan-Nesbit project appears to be targeting big and old trees that would have been protected by the screens-underscoring the danger of turning the 21-inch diameter rule into a guideline only.

I would like to draw particular attention to this part of the research paper about the problem with using historical conditions as a restoration goal. We are living in unprecedented times of higher temperatures, drought, and wild swings of weather as part of global warming-there is no going back to some state a hundred years ago. See this paragraph:

The rationale for harvesting large trees is premised upon the use of historical baselines of stand structure and species composition as management targets, and assuming that by removing large shade-tolerant species like grand fir and Douglas-fir it will promote resilience to future drought and disturbance (Johnston et al., 2018; Merschel et al., 2019; Hessburg et al., 2020). However, ongoing climate change and many other anthropogenic stressors such as habitat fragmentation, invasive species, and declines in biodiversity, heighten concerns over use of historical conditions as management targets (Millar et al., 2007; IPCC, 2018; Ripple et al., 2020).

I also find Morgan-Nesbit at odds with key goals of the Biden administration if we are to honor the intent-particularly the 30 x 30 executive order and protecting old-growth forests.

Lessons Learned on the Lostine, Puderbaugh, Imnaha River-let's not repeat them

Lostine Wild & Scenic River Corridor & Wilderness entry

The Lostine logging project (still ongoing) is an example of what should never happen again-fragmenting a lush narrow wildlife corridor surrounded on three sides by wilderness; drying out forests, inviting in invasive plants with the churned-up soil after destroying delicate orchids, moss, nurse trees, etc.; and cutting down significant wildlife snags and large trees-even with the eastside screens in place. The project also was allowed to go forward with the parts that made the most money (big trees) and to skip others that didn't-flying in the face of state objectives. I participated in the review process, commented, and wrote these three pieces for your reference:

Not Lost Yet, Saving the Lostine Corridor, If Otters Could Vote---Yes on Saving the Lostine, and a post-logging blog: Lostine River Corridor: A Lament and a Promise.

The words I wrote in the last blog (with photos) are especially pertinent to the Morgan-Nesbitt project.

Thinning? I think most people consider this means a light touch. But "thinning" can mean taking out many trees and most of the big ones if a commercial sale. Treating all forests as one-size-fits-all fails to respect the highly evolved ecosystems, where dynamic fire systems have long played critical roles. I won't get into it here, except to say, we must change the paradigm and focus wildfire safety measures where they matter-closest to where

people live. Tearing up the fabric of mature and ancient forests and the elegant underground "wood-wide-web" is an act of hubris.

Puderbaugh- PO Saddle, HCNRA

In October of 2015 I was horrified to stumble across massive slash piles, small clearcuts (called "partial cuts") and torn up delicate soils close to the rim of Hells Canyon at P.O. Saddle -within the NRA and up to the Wilderness boundary. I'd walked into the active "Puderbaugh" sale. Afterwards, I wrote the District Ranger, Wallowa-Whitman Supervisor, and Regional Forester and shared photos with disappointing results. There's nothing redeeming about what happened there and again-it should never happen again. In that instance, the District Ranger went forward with the logging without notifying Greater Hells Canyon Council (then Hells Canyon Preservation Council) as per an agreement. This project exemplifies the same kind of approach I foresee from the scoping at Morgan-Nesbitt-what's on the ground is very different from what is in writing and the story maps-gentle terms like thinning and forest health-really look like this-here are photos I took on that day in 2015 on PO Saddle:

Upper Imnaha River Corridor-along road from Ollokot to Indian Crossing campgrounds-Logging Big Old Ponderosa Pines

While the upper Imnaha river corridor is still beautiful, this last best place for people to appreciate the giant red-gold ponderosas in an accessible setting is missing 103 big ponderosas that were felled without weighing whether they were indeed safety hazards; without understanding western pine beetle ecology, without listening to ecologists and the concerned public; and without assessing how significant, rare, and important are the trees to wildlife-especially the standing big snags. It was a travesty in 2017 that I wrote about in letters to the FS to try to stop the logging and save at least some trees (all were cut down) and in these two blogs: Saving Ponderosa 58 and Remembering Ponderosa 58. I find it frankly depressing at times to be in my beloved upper Imnaha even though I love it-I know what's missing. I am not going to accept the shifting baseline. The damage was done.

New Direction Needed-Ecological, Biodiversity, Climate, Carbon Storage, Small-Scale

I do believe there is more enlightened leadership on the Wallowa-Whitman NF now, but I point these projects out to show what's been going on in treasured places. I have also seen many photos of the logging in the Lower Joseph Canyon-and it's so important to look at what is occurring on the ground and what is being "prescribed" on paper. I don't think the public understands or knows about this severe disconnect in the name of making forests "healthy"---a misleading word when a forest without dead trees, mistletoe, beetle kill, black trees from fire, downed trees, leaning trees, etc.-is an unhealthy forest with less resilience to disease.

The document is full of words reflecting an industrial view of forests that does not value ecosystem qualities that are key parts of biodiversity-and co-evolution over thousands of years. Maybe that's fine for a tree farm-but not for wildland forests that flourish with dead standing trees (snags), which are ever harder to find with all the logging of "danger" trees and bias against them; and do best when they are messy to the human eye liking tidy gardens-beautifully messy with biodiversity-dead, decaying, down, leaning, crooked, mistletoe-rich, and with multiple tree species rather than ones foresters have deemed worthy.

Below, I will include a few snippets from the scoping document to illustrate this bias, which I find dead wrong when it comes to a dynamic forest supporting high biodiversity. There's this attitude of "we know best" what parts of a forest ought to be converted from a dense stand to an open one without accounting for all the species reliant on the density. I also know from my interviews with Dr. Anna Sala that identifying which trees are going to do better with drought is impossible by looking at the trees-and the answer is to preserve the natural mix and diversity-not play god in the forest. See this article I wrote: The Key to a Long Life.

See below for examples illustrating this "we know better" and a bias against diseases, which are naturally part of a dynamic forest ecosystem and critical for wildlife (like Great Gray Owls rely on mistletoe-see this piece: The Owl and the Mistletoe).

From the Morgan-Nesbit scoping document:

"stand conditions proposed for this treatment contain diseases such as root rot and/or dwarf mistletoe."

"To achieve the project objectives, unhealthy, suppressed, and/or fire or drought intolerant trees would be selectively removed to provide remaining healthy fire and drought tolerant trees with enough resources to reduce the risk of disease and insect infestations and remove enough understory trees (ladder fuels) to minimize crown torching and wildfire transmission into the forest canopy.

"Patch cuts will be limited to five acres in size and take advantage of natural openings within the stand. Patch cuts will not represent more than twenty percent of a stand's total acreage. Within patch cuts, healthy drought tolerant species will be retained." (See Puderbaugh and Lostine for "patch cuts"-clearcuts with a few trees left and the mycelial network below fragmented and broken. Just leave the natural openings!)

"All proposed commercial thinning treatments include a situational application of the large tree amendment to the east side screens (86 FR 3990). This treatment intends to benefit healthy, large, early seral trees such as ponderosa pine and western larch. These early seral species will be released from competition with shade tolerant conifers, such as grand fir, by situational removal of shade tolerant trees up to 30 inches DBH within one to two drip lengths of the release tree's crown, but not to exceed sixty feet. (I find this extremely alarming and strongly object-follow the east side screens and do not target these large trees that are critical for wildlife and carbon capture).

"Big Sheep Creek riparian area: "Without treatment, a shift in stand structure to dense grand fir would reduce the quality of fish and wildlife habitat." (again-a bias against grand fir-prove that logging the riparian area won't have impacts on the native salmon fishery and wildlife like the many neotropical migratory birds reliant on riparian areas-lifelines of the landscape with the highest diversity, highest levels of connectivity, hiding cover for wildlife; and with the highest vulnerability especially in this time of drought related to climate change)

Spend time in our roadless areas and Wilderness areas and see how forests fare fine without our interference. See how new growth returns with more vigor after a wildfire without "salvage" logging.

I will include a photo I took in the Wenaha-Tucannon Wilderness after a natural stand-replacing (although not all trees) wildfire on a backpack trip in spring 2017:

Will there be wildfires? Yes. Have there always been wildfires? Yes. Are they hotter and more severe from climate change? Yes. The answer is to reduce fossil fuel consumption drastically and to protect our large trees and intact wildlands that are critical to storing and capturing carbon and for biodiversity. That's where we should put our efforts-along with Firewise communities and attending only to the Wildland Urban Interface.

Other Key Concern - Roads

In addition to what I've added in italics above with the scoping quotes (concerns over logging big and old trees, not following the eastside screens (in litigation); bias against grand fir; not recognizing that a forest with diseases is one that supports biodiversity that keeps diseases in balance; and damages to riparian areas), I'd like to specifically address roads.

The document has this conflicting statement: "No construction of new roads is proposed for this project. Approximately 23.3 miles of temporarily used roads may be constructed to facilitate project implementation." Wait-roads are roads-temporary or not-and they are very damaging for wildlife connectivity and often lead to more logging, and more destruction. (See the 2022 book Ever Green: Saving Big Forests to Save the Planet, by John Reid and Thomas Lovejoy that names roads as the number one threat to big forests-put a road in and all kinds of bad things happen-and a road is a road-"temporary" or not). This is an extremely high level of new roads-more than any project I've seen in recent years on the Wallowa-Whitman NF

I'm also very concerned in this road section to read about proposed activities that would open existing old roads from past projects to more motorized travel like ATVs, and potentially invite future logging and incursions into wildlife habitat. My concern comes from the list of maintenance activities for 367 miles of roads many that clearly have seen little use and ought to be closed and rehabbed not upgraded:

"grading of roadway and shoulder surfaces;" "placement of rock surfacing at specific locations;" "removal of vegetation (brushing) from roadways and roadsides;" "removal of logs that have fallen across roads;" and "removal of danger trees along roadsides."

Conclusion

As stated in beginning, the scale of this project is massive, aggressive, and if carried out will be massively damaging. While the 87,000 acres is not all slated for logging-the units on the map show the intense fragmentation of our forests that would happen. It reminds me of why ranchettes of 40 acres across elk winter range causes havoc and destruction for elk and wildlife across the entirety of the range. That's why in good land use planning, efforts are made to keep housing close together and protect large swathes of open lands.

I'm alarmed at the high number of acres slated for commercial logging in the scoping-17,586 acres-with more than half inside the HCNRA. Are we still treating the HCNRA like just any other part of the forest and disregarding the laws designed to protect it? It seems like we are-sadly. It's time to go back to Section 7 of the HCNRA Act-and through the lens of true restoration and what it means to protect fish and wildlife values.

So please-take a big breath. Stop. Reassess the basic premise of "forest resiliency" as something foresters can replicate rather than backing off and heeding natural processes that will do a much better job at reshaping the forests. Follow the premises of true restoration as I described above. Value this spectacular landscape as a whole-and in perspective regionally, nationally, and internationally. Engage in "true restoration" and I'll be out there at your side cheering you on and writing about it.

Thank you,

Marina Richie

Author of the 2022 award winning book, *Halcyon Journey, In Search of the Belted Kingfisher*

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