



## **Comments for the Oregon Federal Forestland Advisory Committee**

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My name is Ivan Maluski and I am the Conservation Coordinator for the Oregon Chapter Sierra Club. The Sierra Club has roughly 24,000 members located throughout Oregon, both east and west of the Cascades. Our members have a strong interest in the protection of old forests in Oregon and the many values they provide, including clean water, recreation, hunting, fishing, habitat for threatened and endangered species, and climate change mitigation. Additionally, we work in partnership with conservation groups throughout the state, and work with federal agencies to provide constructive input on federal land management proposals.

We support the protection of all existing mature and old growth forests and trees on federal land in Oregon. We believe that policies in place that currently protect older forests in the range of the northern spotted owl, and large diameter trees in the interior Columbia Basin, should be maintained, and in fact, enhanced. If anything, federal agencies need more consistent and clear direction with regard to the protection of older forests, so that priorities do not dramatically shift with every change in the White House or Congress.

Late-successional forests on federal lands in Oregon contain vast non-timber economic values that are critical to economic growth and stability of the Northwest. Clean and abundant water emerging from federal lands in Oregon feeds municipal drinking water supplies, provides irrigation water for agriculture, supports subsistence and commercial fisheries, and is critical for many businesses. Recreation, fishing and hunting associated with federal forests bring in tremendous revenue for businesses around the state.

The quality of life associated with nearby protected public lands, clean water and recreation opportunities draws businesses, new residents and income to the state. Oregon's economy has diversified since the adoption of the Northwest Forest Plan, and this is part of why the overall economic downturn currently underway has not hit Oregon as hard as other states. While this may be true when looking at the statewide economy, part of the challenge for the Federal Forestland Advisory Committee is to identify ways to create economic diversity on a more localized level in rural parts of Oregon. Without this kind of economic diversity and associated resiliency in rural communities, housing market shifts and wildly fluctuating timber prices will continue to mean unsustainable fluctuations in county budgets, rural employment and incomes.

We believe that through older forest protection on federal lands, combined with investments in ecosystem restoration, we can create federal and private investment in green jobs in the forest. It is important, however, that ecosystem restoration be viewed broadly, and not focused solely on the context of tree removal for forest health, as it so often is. We have been talking about the following ideas with members of Oregon's Congressional delegation and believe this can be done in a variety of ways including:



- 1) Directing and funding agencies to develop and implement projects that create local jobs in road maintenance (ie. culvert repair and replacement), reducing road miles through road decommissioning, plantation restoration, and fuel reduction work in the 'Community Protection Zone' where agency scientists tell us limited federal money is most effectively spent protecting structures and property from fire.
- 2) Steering federal highway funds to county road departments to address federal forest road maintenance and decommissioning backlogs. Addressing road maintenance and decommissioning backlogs on federal forests in Oregon could be worth tens of millions of dollars annually, and dealing with these backlogs in coming decades can create well paying jobs while improving fish and wildlife habitat.
- 3) Creating new tax incentives and credits for small businesses engaging in road maintenance, decommissioning and other forest restoration efforts. Incentives and credits would spur investment in equipment for road restoration, light on the land machinery, or small diameter utilization equipment.
- 4) Creating an east-side forest restoration jobs center to provide training, expertise and equipment for road maintenance and decommissioning workers, and training for appropriate ecological thinning in Community Protection Zones.

## Defining Older Forests

You have heard presentations on scientific definitions for mature, old growth and late-successional forests. It is not my intention today to get into the intricacies of these definitions, but would strongly suggest that old growth definitions be scientifically grounded, while acknowledging social perspectives on old trees and forests. I think it has become increasingly clear that the majority of Oregonians of all stripes, rural and urban, believe that too much logging occurred in the past and that old forests should be protected in the future. In discussions with members of the conservation community, the public, foresters, and scientists several possible alternatives emerge that could fit this bill:

- 1) Generally speaking, for western Oregon, the authors of the Northwest Forest Plan noted that 80 years old was a useful cut-off between younger forests that may benefit from careful thinning, versus older forests (>80 years) that should generally be left to develop on their own because the adverse impacts of logging outweigh the ecological benefits. Logging and associated damage to soils from tree removal and roadbuilding activities inevitably degrades soils, water quality, fish and wildlife habitat, and releases carbon dioxide while spreading noxious weeds. Protecting stands greater than 80 years old is also the best way to address the current deficit of old-growth forest habitat, as this forest will more quickly mature into 'classic' old growth forest than younger stands that are thinned.



- 2) In the drier forests of central and eastern Oregon, these issues can be more complicated due to a history of fire suppression and more frequent natural fire intervals. Further complicating the issue on the eastside is that forests there have never been uniform. Historic conditions range from south-facing low elevation ponderosa pine stands with frequent fire intervals to higher elevation mixed conifer forests, both dry and moist. For these forests, all large diameter trees and snags, generally those greater than 20 inches diameter or more than 80 years old, should be protected, particularly those structural components in place before fire suppression. Management should be focused on small diameter (generally less than 12" dbh) trees and ladder fuels. In the end, due to the diversity of eastside forest types, this will be very site specific, and any work that is conducted for the purpose of ecological restoration must be conducted with strict environmental sideboards, including diameter caps on trees, protection of older trees, and the use of light-on-the land equipment.
  
- 3) Dry forests affected by decades of fire suppression, particularly lower elevation historically ponderosa pine stands, can sometimes benefit from the removal of small fuels such as brush and small diameter trees in order to protect rare large and old trees from fire and drought stress. There is not, however, unanimity regarding the extent to which this is necessary, and real concerns exist about lasting damage to soils from mechanical entry into forests, the spread of invasive species, impacts on aquatics, and the potential for increase in fire risk from projects that remove large trees or leave slash behind. Research has shown that the removal of larger diameter commercial trees in drier stands can actually increase fire risk while damaging wildlife habitat and soils. Again, talk about drier, fire suppressed forests must be very site specific, and any work that is conducted for the purpose of ecological restoration must be conducted with strict environmental sideboards, including diameter caps on trees, protection of older trees, and the use of light-on-the land equipment. It is the Sierra Club's belief that this type of work should be prioritized in stands based on their proximity to communities at risk of wildfire. Such a prioritization is necessary due in part to limits on federal funding, but also because there is an abundance of work that should take place in Wildland Urban Interface zones that can protect communities and build trust around specific management practices. This trust around proven practices should be established before more remote projects are moved forward that may be more controversial and may have more significant environmental impacts.

## The 'Appropriate Amount' of Older Forest

As I mentioned earlier, we believe it is appropriate to protect all existing mature and old growth trees and stands. Unfortunately, most of the large fire-resistant trees across the landscape have been logged and today there is a severe deficit of both mature and old growth forest habitat<sup>1</sup>. Historically, the amount of older forests varied due primarily to natural disturbances like fire. In

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<sup>1</sup> USDA and USDI. (1994). IV-29. Late successional forest characteristics begin to appear in mature forests at around 80 years of age; old-growth forest characteristics begin to appear around 150 years of age.



the area of the Northwest Forest Plan, the historical extent of old growth was roughly two-thirds of the landscape<sup>2</sup>. Today, less than 20% remains<sup>3</sup>. In central Oregon, where large ponderosa pine forests were common, scientists have estimated that 6% or less remains on the Deschutes, Fremont and Winema National Forests.<sup>4</sup> The structural characteristics that make forests resilient to fire must not only be protected, they must be allowed to increase over time.

Old forests are places where natural processes should largely be allowed to proceed without mechanical intervention. The structural components of older forests such as large trees and snags, and large downed woody debris take time to create, and protecting existing mature forests over 80 years provides the best way to make up for the current old forest deficit we face in Oregon. Another way to look at the 'appropriate amount' question would be to ask: are we providing enough habitat to successfully recover threatened and endangered species or are they still in decline and failing to recover? Are we improving the viability for forest indicator species? In streams where water quality is limited due in part to past roadbuilding and logging on federal land, are federal land management policies leading to improved water quality? Are we sufficiently protecting watersheds to guard against catastrophic road failure and landslides in the event of 100-year type storms and rain-on-snow events that lead to flooding, property damage, road failure, fish habitat degradation, and water quality problems? Are we protecting older forests so that they sequester carbon to help meet Oregon's ambitious greenhouse gas reduction goals? And finally, as population grows over the next 50 years in Oregon, are we protecting sufficient older forests to meet the increased demand for forest recreation as well as simultaneous needs for clean water for municipalities, irrigators, and fish?

We believe that under existing federal laws and authorities, agencies have ample discretion to make a shift to protecting older forest stands and trees while actively managing younger stands for restoration and prioritizing community fire risk-reduction work. A core barrier lies in the culture of our federal land management agencies, and a lack of trust due to past mismanagement. In both the BLM and Forest Service, professional foresters help set the direction for management and have simply had a terrible track record meeting basic environmental standards and maintaining the public's trust. Agency foresters are not necessarily prepared to manage old-growth forests for conservation and all the ecosystem services that the public expects from their forests. Trust is a major issue. Once an agency decides it wants to proceed with a certain controversial management plan or timber sale, it is often rare that public comments are incorporated, and as a result, the agencies often lose in court after proceeding with clearly illegal and environmentally harmful inappropriate projects. That being said, some individual forest managers are taking steps to build trust with the public and incorporating good ideas that can mean progress on the ground. The Siuslaw National Forest, for example, is nationally noted for its shift to road restoration and plantation thinning and having great success in moving forward

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<sup>2</sup> Strittholt, J. R. 2006. Status of mature and old-growth forests in the Pacific Northwest. *Conservation Biol.* 20:363-374.

<sup>3</sup> Strittholt et al. 2006 (Table 1:367) Percent reductions in old-growth forests for 8 ecoregions in the PNW range from (-33%) to (-95%) of historic conditions: Cascade Mountain Leeward Forests (-56%); North Cascades Forests (-33%); Puget Lowland Forests (-95%); Central Pacific Coastal Forests (-82%); Central and Southern Cascades Forests (-61%); Eastern Cascades Forests (-79%); Klamath-Siskiyou Forests (-62%); and Willamette Valley Forests (-91%).

<sup>4</sup> Noss et al. (2006): 484



with non-controversial projects while earning money for the US Treasury, even as other federal forest managers in the region have gone the opposite direction. Meanwhile, shifts in management direction from Washington, DC over the past seven years have further eroded public trust in the intentions of many federal forest managers.

The solution is clear: agencies need specific direction from Congress that older forests are off limits, and that resources must be redirected to ecologically justifiable forest and road restoration, and appropriate community protection work. Additionally, significant reform is needed in how the agencies are funded so that there are not internal incentives to push the wrong types of projects. It is not uncommon for federal agencies to plan and attempt to sell federal timber sales during poor market conditions due to the need to spend appropriated dollars in a given year, or to garner timber sale receipts the agencies keep in special in-house funds that don't need to be returned to the US Treasury.

A final barrier to meaningful progress on these issues is the constant swing of the political pendulum with regard to federal forest management. The constant push for more old growth logging from the current administration, efforts that have often withered under basic legal scrutiny, has wasted tremendous amounts of time that could have been spent moving forward with moderate, common sense solutions that many different stakeholders can support or live with. I unfortunately am not hopeful that the anticipated 11<sup>th</sup> hour approval of the BLM's Western Oregon Plan Revision will be any different.

In conclusion, we believe that agencies already have the tools they need to do the right thing by protecting older forests and shifting management activities to younger forests and restoration. However, clear guidance from Congress for the protection of older forests and adequate annual funding to pursue restoration activities will be necessary in order to help provide certainty and stability. In the meantime, federal agencies should focus on efforts that build trust with the public and demonstrate that non-controversial projects can and do move forward. This process can be started by re-focusing attention on planning and implementing appropriate work in priority wildland urban interface areas, and pursuing younger forest management and road restoration projects.