

MOST PRESSING PROBLEMS
[COMMENTS OF DOUG HEIKEN]

- 1. Past management practices have imposed significant costs upon current managers. Funding is inadequate to achieve land management objectives on federal lands. A stable funding source is necessary to achieve long-term management goals.**

Practices such as regeneration harvest, dense replanting, road building, and fire suppression leave future managers with costly follow-up management activities such as pre-commercial thinning, fuel reduction, weed control, and road repair and removal. The Forest Service has found that there is an increasing need for timber stand improvement work but a declining trend in budgets and accomplishment, so there is a growing backlog of needed treatments especially in young, previously-managed stands.¹ There are similar backlogs in fuel management, road maintenance, weed treatments, and stream rehab. In other words, we are neglecting the problems created by past management, and we should not be compounding these problems with more business-as-usual forestry. Those who hold the purse strings must understand that today's investments in forest restoration are an obligation that was committed to in past decades when the commodities were extracted. Future management should strive to avoid placing further burdens on the future and reduce future costs of management by using and mimicking natural processes to make forests *self-regulating* as much as possible.

There is a severe lack of funding for the federal land management agencies. Funding is insufficient to provide basic stewardship of the land and its resources, and to offer a high level of environmental, economic, social and cultural benefits. Declining budgets limit the agencies ability to maintain staffing levels of the past, resulting fewer employees to accomplish objectives. An increase in fire suppression funding

¹ See Powell, David C.; Rockwell, Victoria A.; Townsley, John J.; Booser, Joanna; Bulkin, Stephen P.; Martin, Thomas H.; Obedzinski, Bob; Zensen, Fred. 2001. Forest density management: recent history and trends for the Pacific Northwest Region. Technical Publication R6-NR-TM-TP-05-01. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Region, 22 p. <http://www.fs.fed.us/r6/FDMwhitepaper.pdf>

Key Findings

- Timber stand improvement (TSI) attainment was 56,913 acres in fiscal year 2000—60% lower than 12 years before (FY1988)
- The trend for TSI funding has been downward over the last 12 years.
- The trend for TSI unit cost (treatment cost, in dollars per acre) has been upward over the last 12 years. Unit cost increased substantially during the last 2 fiscal years.
- The need for forest density management work (thinning and release) was 423,646 acres in fiscal year 2000— 61% higher than 12 years before (FY1988).
- Forest density management attainment was 50,670 acres in fiscal year 2000—55% lower than 12 years before (FY1988).
- The net result of these trends is that a backlog of FDM work accumulated on Pacific Northwest national forests. Projections indicate that if recent trends continue, the FDM backlog will increase by at least 50,000 acres (13%) between fiscal years 2000 and 2005.

has come at the expense of preparedness, fuel reduction and all non-fire programs. The proportion of fire suppression funds in the Forest Service budget was 13% in 1991; it is 45% in 2007, while the total budget has decreased. This results in insufficient funding for environmental assessment and monitoring of aquatic ecosystems, wildlife habitat restoration, invasive species management, range management, facilities and access maintenance, road maintenance and decommissioning and recreation management.

2. **Forest management involves multiple goals. Integrating these goals and resolving inevitable conflicts will always be challenging. The legal framework governing federal forestlands contains conflicting goals and provides little direction on how to balance the production of multiple resources.**

A de facto resolution of the multiple goals on forest lands has been the default decision that private lands emphasize private interests and public lands emphasize public values. We allow private forest lands to emphasize private profit and shift some of their costs to the public such as polluted water, depleted fish & wildlife, and CO₂ pollution. Public forest lands are then expected to provide the majority of public values such as clean water, fish & wildlife habitat, recreation, and carbon storage for a livable climate.² Since commercial logging for the sake of private profit conflicts with virtually every public value, to the extent that public lands do not have to provide timber volume to enrich private interests, it will become easier to integrate all the multiple public goals on public lands. (If the committee wants to do something bold this is it. Recommend that federal lands focus on providing public values.) A clear and widely shared purpose is lacking for federal forestlands. Federal forestlands are managed under a complex set of statutes (NFMA, FLPMA, NEPA, ESA, CWA, etc.) that sometimes have conflicting goals. [At some point, those who think there are conflicts should get very specific so we can have a detailed discussion about each conflict, how it has been resolved in the past, and how it might be resolved differently. Sometimes “conflicting laws” is just a slogan thrown out by those who don’t like our environmental laws.] While NFMA and FLPMA provide the legal framework for balancing the production of multiple resources, consistent with the regulatory framework in other laws, the main issue is a clash of public values, as reflected in the laws and refined through court opinions. Conflicting public values have been expressed in lawsuits, which have contributed to increased paperwork, staff time, litigation, and public frustration and lack of trust. Agency and public focus often revolves around process more than desired outcomes. Current laws and rules also do not require analysis of the “balance of harms” that will occur if a project is not

² “The broadest set [of ecosystem outputs] is appropriate to publicly owned lands because constituencies are likely broadest and most diverse, and because some types of outputs will only be available from public lands (Hyman 1973). . . . All of this is part of a broader question of who benefits and who gains from management of FS- and BLM-administered lands. Understanding this provides the basis for assigning costs of land management.” Haynes, Richard W.; Graham, Russell T.; Quigley, Thomas M., tech. eds. 1996. A framework for ecosystem management in the Interior Columbia Basin including portions of the Klamath and Great Basins. Gen. Tech. Rep. PNW-GTR-374. pp 18-22.

implemented. i.e., analyze the impacts of an action vs. no action; however, neither do they prohibit this analysis. [This last point does not present a problem. That is what NEPA public comment is for. I find that the agencies are quick to point out the possibility of catastrophic fire if some thinning does not get done, but they are less likely to describe the ecological benefits of forest protection and the possibility that a low intensity fire might go through an area and thin the forest for free if only we would stop fighting fire when low intensity fires occur.]

3. **Natural processes have been disrupted in the forests of Oregon. Natural fire cycles have been disrupted by fire suppression. Logging disrupts naturally long intervals of uninterrupted forest growth and the forest patch dynamics to which many species are adapted. Road building has disrupted the natural flow of water through watersheds. Salvage logging disrupts the natural processes that create complex young forests that develop into complex old forests.**

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This problem statement needs a more balanced presentation of the various disrupted processes. Oregon would not be famous for its cathedral forests if not for long intervals of uninterrupted growth. This problem statement should also reflect the fact that there are uncertainties and controversy about the definition of "uncharacteristic" fire and fuels and whether commercial logging is an effective fuel treatment. Natural processes on Oregon's federal forests have been modified by a number of factors. For example, fire suppression and silvicultural practices on some federal forestlands have modified fire regimes and behavior producing changes in vegetative conditions (including species composition, stand density, and a large tree component). Growth has dramatically exceeded removals on federal lands during the past decade causing a build up of fiber across the landscape. High tree mortality and fuels build-ups have altered how wildfire, insects, disease and invasive species interact with forests, ultimately modifying forest resiliency. Without an increase in active management these conditions will result in impacts to wildlife habitat, water quality, private timber investments, structures in the wildland-urban interface, and public impacts from smoke³.

4. **Logging releases large amounts of carbon into the atmosphere which threatens our livable climate. Climate change will also disrupt our forests and alter the ecosystem services that flow from them. Management decisions will in part determine how well our forests adapt to climate change as well as whether federal forests will serve as net carbon sinks or carbon sources. Climate change combined with wildfire may cause wholesale conversions of some habitat types.**

Climate change may be affecting forest and hydrological conditions in Oregon. If

³ "Active management" means the application of practices through planning and design, over time and across the landscape, to achieve site-specific forest resource goals. Active management uses an integrated, science-based approach that promotes the compatibility of most forest uses and resources over time and across the landscape. "Active management" should not be equated with "intensive timber management." Instead, it refers to taking proactive steps to achieve whatever management objectives have been established for a forest site. [Based on the *Forestry Program for Oregon and OAR 629-035-000 (1)*.]

trends continue, changes from dry temperate forests to grasslands, moist forests to dry woodlands, and high-severity fires may eliminate entire forest types. This type of change would increase risks of species extinction, and reduce economic and social values derived from the forest. Management decisions will determine if federal forests will serve as net carbon sinks or carbon sources.

5. **Rural communities are still adjusting to changing social and economic conditions and will likely continue to face challenges as the global economy never stands still. The economic and social benefits produced by federal forests are below their potential. Critical family wage jobs have been lost and some rural communities in Oregon are suffering. Private forestlands are being converted to non-forest uses.**

This problem statement needs to be significantly rewritten to reflect the fact that rural community vitality is NOT closely tied to the volume of federal timber sales. The Northwest Forest Plan 10-year monitoring effort reveals that a fundamental shift in thinking has occurred. "Assumptions were challenged regarding both socioeconomic and ecological relationships, with implications for both. One of the more important set of findings concerns the role of the federal lands. From a socioeconomic perspective, it was assumed that timber flow from federal lands was a key determinant of community well-being. This turns out to be true in some communities, but not in most."⁴

- a. The economic conditions in rural communities are the result of a myriad factors, and federal timber is only a very small factor. The Sonoran Institute conducted a study of rural economies in the west and "It turns out there is an inverse relationship between resource dependence and economic growth; the more dependent a state's economy is on personal income earned from people who work in the resource extractive industries, the slower the growth rate of the economy as a whole."⁵ In recent years Oregon's economy as a whole has grown while the timber industry has remained stagnant. It is unwise to tie economic development to a declining industry.
- b. The Sonoran Institute's Report found that proximity to protected public lands is positively correlated with economic growth, as were access to education, transportation, airports, entertainment, and mountains. We should be trying to steer the economy away from commodities and toward a more diverse economic base.
- c. "... [T]he premise that public resources such as forage, timber, minerals, and energy can stimulate local economic stability presumes that the local economy is indeed dependent on federally-owned resources. All too often the role public land managers play in community development is based on an antiquated, mythical view of the economy. ... Three forces are at work in shaping the world economy. First, the industrial economy is becoming uncoupled from the primary products economy (i.e., raw materials). Many of

⁴ Draft synthesis of the NWFP 10-year monitoring reports, 4-15-05, pp 13-14.

⁵ Ray Rasker, Prosperity in the 21st Century West, Sonoran Institute, 2004.
<http://www.sonoran.org/pdfs/Prosperity%20Report.pdf>

- the most valuable 'products' in today's economy, like computer software and medical technology, require few raw materials. Second, within the industrial economy itself, employment has become uncoupled from production. Manufacturing efficiency has decreased the demand for physical labor. Instead, human resources are increasingly applied in research, design, engineering, finance, marketing, and other 'knowledge-based' or 'value-added' applications. Third, capital has become 'footloose' - money follows good ideas, no matter where they occur on the globe."⁶
- d. In the 1980s, federal timber harvest significantly increased, while both employment and wages declined. This was caused by new technology, global competition, and union-busting. These pressures will continue.
- e. Local communities should be preparing for a future that is different than the past. Has there ever been a time when our region has not been in flux? The tools of past management, such as timber sales, may not meet the needs of the future when the Forest Service and BLM may be selling clean water and carbon instead of logs. "Communities in the West must shift their focus from what worked in the past, and ask instead what will work in the future. Economic wealth consists of much more than raw materials. There is also wealth in the quality of the environment for non-consumptive uses, ... For many rural communities, the economic benefit of living adjacent to public lands has historically been access to vast repositories of raw material. Because of this economic history there has been a tremendous bias on the part of public agencies to equate quantitative expansion in commercial activities with social and economic well-being. Lacking is a perspective on economic development that measures the role of quality of life as provided to community residents living next to public lands: the mountains, scenery, wildlife, clean water, wilderness, and other non-commercial amenities. ... [A] community stability strategy which emphasizes commodity extraction has been shown to be counter-productive, particularly when those activities threaten the amenity-based foundation of the new economy."⁷
- f. Conservation of federal forests provides some degree of regulatory stability for non-federal landowners. This is a significant economic benefit of federal lands and is consistent with the different roles played by federal and non-federal lands. "The extensive habitat protection on federal land ... has allowed the agencies that are responsible for enforcing the Endangered Species Act to permit more intensive economic utilization of nearby state and private lands than would otherwise have been possible. Before the Northwest Forest Plan, uncertainty prevailed in the region concerning the extent to which state and private landowners would be able to produce timber from their lands without violating the prohibitions of the Endangered Species Act concerning the 'take' of threatened or endangered species. This uncertainty, and fear that an agency might later declare land 'critical habitat' for a threatened species, made it

⁶ Raymond Rasker, A New Look at Old Vistas: The Economic Role of Environmental Quality in Western Public Lands, Colorado University Law Review, 1994, <http://www.sonoran.org/programs/pubs/Rasker%20-%20CU%20Law%20Review%201994.pdf>

⁷ Id.

- difficult for some private landowners to make long-term plans about the economic utilization of their lands. ... [A] major accomplishment is that the Northwest Forest Plan has provided regulatory and economic stability for owners of state and private lands ...⁸
- g. Rural communities can participate in lots of important non-logging work that our forests need. E.g., fuel and fire management, pre-commercial thinning, weed control, road work, stream rehab, recreation management, etc. Restoration can be part of the economic diversification process, involving local workers in the repair and rehabilitation of damaged lands, streams, and roads. Restoration has become a major industry in Humboldt County, bringing in \$65 million between 1995 and 2002 and employing 300 people.⁹ The substantial back-log of unmet restoration needs indicates that this could be a fairly stable, long-term source of social and economic benefits.
 - h. Some might even say that the social contract has been rewritten. It is no longer socially acceptable to log mature and old-growth forests on federal lands. The public places much higher value on clean water, wildlife habitat, quality of life, and a livable climate today, than they did in earlier times, and the public is far less tolerant of environmental damage. We should not delude rural communities by leading them to expect to change this; they must adjust to a new reality.
 - i. Rural communities often like to think of themselves as self-reliant when in fact they often gain significant economic benefits from the government in the form of government payroll and transfer payments such as social security and health benefits. In many rural communities, these government monies are often more important to the economy than commodity extraction.

Timber harvest on federal lands in Oregon has dropped 80 percent in the last 20 years. Oregon is beginning to lose the local capacity, markets and workforce needed to support a viable forest products industry and to provide forest protection and restoration services. Some sawmills in western Oregon are currently being supported by sawlogs imported from Washington, while the eastern Oregon timber industry has concerns about losing infrastructure in the future. Once the infrastructure is gone, it will be difficult to rebuild. This may be contributing to private forestlands being converted to non-forest cover and land uses. [The link between federal timber harvest and private timberland conversions is far fetched. For one thing, unlike most other states, Oregon has land use laws that discourage such conversion, and those land use laws have been found to be working fairly well. Second, private landowners can sell their logs even if there is not local milling infrastructure. That's why logs from Montana and Idaho are feeding Oregon mills today. In most cases, the scale of local infrastructure should be scaled to the available log supply from non-federal lands. The federal land log supply will likely remain uncertain and sporadic.] Oregon is at a crossroads: do we attempt to increase the economic diversity in many forest-based Oregon communities with recreation-based jobs, restoration jobs and non-commodity

⁸ James Pipkin, THE NORTHWEST FOREST PLAN REVISITED, September 1998, http://web.archive.org/web/20030803082439/www.doi.gov/nrl/PPA/NWForest/Full_rpt.htm
⁹ <http://www.sierrainstitute.us/Media/HoopaReport.pdf>

values – including jobs associated with tourism, fuels work, prescribed fire, weed control, road removal, erosion control, and instream habitat improvements - or do we increase federal timber harvest to help maintain the timber industry infrastructure and reduce the conversion of private forestlands to other uses? It is important to note that forest restoration, recreation and other non-commodity work, while clearly needed, depend on investments that do not compete well in Federal, State or corporate budgets. There is a mis-match among ecological/social need, public/political rhetoric, and the hard realities of budgets.

6. Forest management has degraded watersheds. Important public uses are not being met because water quality is impaired, and the timing of run-off has been altered. Water quality and quantity is insufficient to protect important uses in the future.

Forested watersheds can provide important ecological services related to water. Undisturbed forests provide the cleanest water and regulate the flow of water to help moderate seasonal high and low flows. Management activities such as logging, road building, and grazing impair these watershed functions. Restoration is difficult and expensive. Although water quality on Oregon forestlands is generally higher than on non-forested lands, in some forested areas on federal lands water quality is insufficient to protect beneficial uses, such as drinking water, fish and aquatic life, recreation, and irrigation, although water quality can also be impacted by grazing, mining, and recreation. Riparian vegetation, important for many functions, is in poor condition in some areas. Salmon and other aquatic life are especially vulnerable to temperature, sedimentation and toxic pollutants; federal forestlands often provide key refugia for at-risk fish species. The current backlog in road maintenance and road closures may be increasing sediment production and affecting peak flows. The ability to construct reservoirs on state or federal lands is limited. Oregon lacks an open dialogue with water users whose water sources are on federal forestlands and whose conveyance systems cross forestlands. In addition, there is not a comprehensive watershed restoration priority action plan that integrates the actions of all landowners.

7. The amount and quality of some forest habitats are insufficient to provide for some wildlife species. [While technically accurate, the use to these two qualifiers makes it look like someone is trying to minimize this problem. Strangely, the fire hazard problem #3 is non similarly qualified. Maybe it should read “[Some] forests are over-stocked, experiencing [some] massive forest health problems, and in danger of losing [some] key ecological components to wildfire.”]

Oregon lacks a comprehensive policy to ensure that biological diversity goals are being met through the combined management objectives of Oregon's public and private landowners. While many Oregon forests have been fragmented by roads and timber harvesting, Wilderness Areas and Inventoried Roadless Areas on National Forest lands comprise 27% of all NFS lands in the state (**need BLM figures**). They continue to provide valuable habitats for wildlife species that use contiguous blocks of interior forest. Some types of forest habitats on federal forestlands are in poor

condition. The dense young plantations on the west side of Oregon are resulting in declining forage for deer and elk and in some areas a lack of dead wood for dependent wildlife. On the east side, there is a lack of large woody debris and wildlife habitat associated with late and old forest structural stages and old forest abundance on the landscape. Treating dry-site, high fire regime forests should be done with wildlife habitat needs in mind.

8. **There is a significant shortage of older forests both east and west of the Cascades. The amount of late successional forest is below historic levels.**

The committee's revision of this problem statement during Monday's meeting deleted the core problem, that is, we have a large deficit of older forests. Past logging left us with too little old forest and consequent violations of the Endangered Species Act, Clean Water Act, National Forest Management Act, etc. Managing within the natural or historic range of variability is a recognized objective of both the Northwest Forest Plan and the Eastside Screens.¹⁰ This is the conclusion of over 15 years of science and

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Swanson et al. (1994) contend that managing an ecosystem within its range of variability is appropriate to maintain diverse, resilient, productive, and healthy ecosystems for viable populations of native species. Using the historical range of variability, they believe, is the most scientifically defensible way to meet society's objective of sustaining habitat.

Patrick Daigle and Rick Dawson, Extension Note 07: Management Concepts for Landscape Ecology (Part 1 of 7), October 1996.

<http://www.for.gov.bc.ca/hfd/pubs/docs/en/en07.pdf>; citing Swanson, F. J.; Jones, J. A.; Wallin, D. O.; Cissel, J. H. 1994. Natural variability--implications for ecosystem management. In: Jensen, M. E.; Bourgeron, P. S., tech. eds. Eastside Forest Ecosystem Health Assessment--Volume II: Ecosystem management: principles and applications. Gen. Tech. Rep. PNW-GTR-318, Portland, OR: U.S. Dept. of Agriculture, Forest Service, Pacific Northwest Research Station: pp 89-106.

... This ecosystem management approach assumes that deviations from the natural distribution of seral stages will increase the risk to biodiversity, whereas less change will decrease the risk.

Susan Bannerman, Extension Note 18: Seral Stages across Forested Landscapes: Relationships to Biodiversity (Part 7 of 7), April 1998.

<http://www.for.gov.bc.ca/hfd/pubs/Docs/En/En18.pdf>

Stewardship of aquatic resources has the highest likelihood of protecting biological diversity and productivity when land use activities do not substantially alter the natural disturbance regime to which these organisms are adapted (Swanson et al. in press).

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The Eastside Screens say "2) ... The intent is still to maintain and/or enhance LOS components in stands subject to timber harvest ... Manipulate vegetative structure that does not meet late and old structural

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policy and this point should not be lost. If the committee seeks to revisit this long-standing, well-supported objective they are more likely to create conflict rather than find consensus. The fact that it is hard to define "old growth" is not a significant problem because we know we need to protect all we have and grow more, so it is rather meaningless where the line might exist on the continuum between mature and old growth forest. We need to protect mature forest because it is the next generation of old-growth. Let's just call it "older forest" for short. The Northwest Forest Plan said that 80 year old stands are starting to attain the characteristics of old forests and are generally not improved by logging. The east side screens said that trees >21" dbh need to be retained to rebuild depleted old fire resilient forests on the eastside. These are pretty clear and have worked fairly well to slow the loss of older forests. Late successional habitat on federal forestlands provides for older forest associates and threatened species. Public values and congressional intent need to be clarified to determine how much late-successional forest is wanted, given the conflicting demands of humans and wildlife on the landscape.

9. **Decisions about forests should be made in a global context.**

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Oregon's forests are important to the global environment, economy, and society. Both the federal government and Oregonians have not fully considered the impact of their decisions regarding federal land management at local, state, national, and international levels. As a result, environmental challenges and economic opportunities have been exported to other nations. As presented, this is standard fodder from Oregon's pro-timber think tanks. When clear cutting Oregon's forests reached its peaks in the 1960s, '70s, and '80s, we never knew we were saving the world. Let's just consider our past unsustainable logging transgressions as having done enough to save the rest of the world.

If we really care about the global impact of our actions we will expand this problem statement to encompass two things: (a) We are not only exporting adverse consequences but also beneficial consequences. Let's consider the global *benefits* of managing our forests to fulfill their potential in terms of carbon storage, water quality, wildlife habitat, etc. (b) We must not engage in a "race to the bottom." Let's consider how we can best conserve our forests then help the rest of the world by exporting the sound principles of federal forest management such as managing within sustainable limits imposed by the natural range of variability, mimicking natural processes, conserving biodiversity, protecting reserves and roadless areas, protecting soil and water, etc...

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(LOS) conditions, ... in a manner that moves it towards these conditions as appropriate to meet HRV [historic range of variability]. ... Manipulate vegetation in a manner to encourage the development and maintenance of large diameter, open canopy structure."

10. Federal, state, and local governments lack a process to coordinate policy decisions and achieve landscape scale objectives.

This problem statement appears to put us on a slippery slope toward divesting our National Forests. We must not forget that these are national forests which the national public has a stake in conserving. "Local control" has a poor track record of conservation, and is a big part of what lead to our current problems. We should respect the input of those who live close to the forest but not let local interests drive federal forests to serve primarily private interests. The Federal land management agencies are required by the Federal Land Policy and Management Act and the National Forest Management Act to coordinate their activities with and/or to be consistent with state and local government planning activities. Historically there has been little if any coordination or consistency in Federal land management decisions other than to request comments from the agencies during the public comment period.

As a result the concerns of the local governments in the communities that are most affected by the management of Federal forests have been afforded the same status of comments originating from communities far removed from the Federal forest. County and City elected officials' concerns relative to forest health, public safety, economic and other matters of county or city concern are therefore not afforded the consistency or coordination required by Federal land management statutes or State law. The discretionary actions relating to Federal lands must be fully coordinated between Federal, state and local governments through more extensive and true partnership relationship.