

# Oregon Wild 1999 Policy Statement on the Northwest Forest Plan

## BACKGROUND

The Northwest Forest Plan, also known as the President's Forest Plan or "Option 9," establishes a comprehensive federal policy for managing federal forests in Washington, Oregon, and northern California primarily west of the Cascades. The plan came into being:

- after decades of unsustainable, short-rotation clearcutting (combined with fire suppression and road building) radically altered landscape patterns and the relative abundance of young and old-growth forests that once existed within westside forests;
- after concerned citizens had proven in federal court that the Forest Service and the Bureau of Land Management were managing the forests in violation of federal law and won repeated court injunctions against continued cutting of old-growth forests (see the fourth bullet in the next section);
- after Congress had passed extreme budget "riders" (e.g. "Section 318") to over-ride the injunctions and mandated the cutting of eight billion board feet of precious old-growth forest without regard to environmental impacts; and
- after President Clinton and Vice President Al Gore convened an all-day Forest Conference in Portland, Oregon in partial fulfillment of a campaign promise to end the gridlock over federal forest policy.

From this tangled web of events came the "Train Wreck Theory." Many people think that the Reagan and Bush administrations, in order to make sound forest management appear unworkable, were purposefully mismanaging the forests and proposing new forest plans knowing them to be legally inadequate. And out of the ashes of this "train wreck" was supposed to emerge a return to the good old days of clearcut, slash-and-burn forestry. To some extent the train wreck worked. At least in the short-term, the high-level of illegal clearcutting in the 1980s and the volume released by the 318 rider in the 1990s boosted the short-term timber supply and profits of a few timber companies, but ultimately the train wreck strategy will backfire. Our public forests are so over-cut as a consequence of this ill-conceived forest policy that timber harvest now must be drastically reduced in order to allow our public forests to heal.

## WHAT THE WESTSIDE FOREST PLAN TRIES (BUT OFTEN FAILS) TO DO

- Recreate functioning and well-connected old-growth forest ecosystems and aquatic ecosystems on federal lands throughout the range of the Northern spotted owl. The Plan will take 150 years or more to "grow" old-growth where it is needed and restore the damage caused by 50 years of intensive clearcutting.
- Provide habitat to maintain minimum viable populations of all species dependent upon older forests, including spotted owls, marbled murrelets, salmon, as well as scores of lesser known vertebrates and invertebrates. These species should be well-distributed throughout their range on federal lands.
- Establish an Aquatic Conservation Strategy (ACS) that includes:
  - delineation of *Riparian Reserve Areas* where special standards and guidelines control land use,

- designation of *Key Watersheds* to provide refuge for at-risk fish stocks and to protect high quality water sources,
  - implementation of *Watershed Analysis* to develop site specific strategies for achieving ACS objectives, and
  - funding for a comprehensive long-term program of *Watershed Restoration*.
- Rectify all the legal deficiencies found by numerous federal courts when they enjoined harvest of old-growth on federal land, including:
    - failure of the USFS to adequately consider the effect of their spotted owl strategy on other old-growth dependent species,
    - failure of the BLM and the USFS to consider the most recent scientific information on the status of spotted owl populations,
    - failure of BLM to consult with the USFWS regarding its spotted owl conservation strategy, and
    - failure of the USFS and the BLM to account for the consequences of BLM's inadequate plan for protecting spotted owls.
- Ensure compliance with all federal legal requirements, including:
    - the duty to conserve habitat for species listed under the Endangered Species Act,
    - the duty to provide habitat sufficient to maintain viable populations of species pursuant to the National Forest Management Act, as well as
    - the requirements of the National Environmental Policy Act, the Clean Water Act, the O & C Lands Act, and the Federal Land Policy and Management Act.
- Establish land allocations and policies to guide management activities, including timber harvest, within each allocation. These allocations include:
    - *Late Successional Reserves (LSR)*: 7.4 million acres, 30% of federal lands, managed to protect and enhance old-growth forests and habitat conditions for species dependent upon old-growth within a system of well-distributed large blocks of forest;
    - *Matrix*: 4 million acres, 17% of federal lands, managed primarily but not exclusively for timber harvest;
    - *Riparian Reserves*: 2.5 million acres, 10% of federal lands, managed to provide high quality water supply, habitat for salmonids, and dispersal habitat for spotted owls and other wildlife;
    - *Key Watersheds*: 9 million acres, 37 % of federal land, managed for watershed restoration. (This allocation overlaps with LSR, Matrix, and Riparian Reserves.);
    - *Adaptive Management Areas (AMA)*: 1.5 million acres, 6 % of federal lands, managed to encourage testing of technical and social approaches to achieving ecological, social, and economic objectives (This allocation overlaps with LSR, Matrix, and Riparian Reserves.);
    - Congressionally designated Wilderness, Wild & Scenic Rivers, National Parks, National Monuments, etc: 7.3 million acres, 30% of federal lands, managed for designated purposes.
- Provide a predictable and sustainable output of raw materials, including:
    - a *probable* output of 1.1 billion board feet of timber per year, and
    - an estimated 116,000 timber-related jobs regionally (56,400 jobs for Oregon).

- Establishes a plan for management of ecosystems that cross administrative boundaries. Eliminate many of the inconsistencies between the Forest Service and the BLM management practices.
- Provide measures to mitigate timber harvest, such as: survey and protect rare species prior to timber harvest, retain some green trees, standing dead trees, and large woody debris in harvest units.

## **PARTIAL LIST OF PROBLEMS WITH THE WESTSIDE FOREST PLAN**

- ***No place is safe from the saws.*** Timber harvest is allowed in every single land allocation except Wilderness. Harvest is allowed even in the Riparian Reserves and the Late Successional Reserves. In LSRs they can cut in stands up to 80 years old. In RRAs they can get away with almost anything. Extensive timber harvest is already occurring in riparian reserves, LSRs, and key watersheds. On the Winema National Forest, a new ski area is being proposed in an area designated as an LSR and Key Watershed.
- ***A large percentage of the remaining old-growth is left in the Matrix, where it will be clearcut.*** The westside of Oregon retains only about 10% of the old-growth that it once contained, yet over 30% of the remaining old-growth in Oregon is in either the Matrix or in the AMAs where it can be clearcut. In implementing the forest plan, the agencies prefer to get their timber volume by further liquidating the old-growth in the matrix rather than thinning young stands to accelerate creation of big trees.
- ***The Late Successional Reserves are a sea of old clearcuts that are unsuitable for many old-growth species.*** The Northwest Forest Plan assumes that about 80 percent of the reserves must be restored to late-successional condition, but currently only about 40% of the acres in LSRs are made up of forests with "medium and large conifers," and only 30% of Riparian Reserves acres are made up of medium and large conifers, meaning that up to 60-70% of the reserves are basically clearcuts and plantations full of small trees. There is a 3 million acre gap between the current 5 million acres of old forest in the reserves and the 8 million acres they should have. This 3 million acre old-growth deficit is almost one-third of the 10 million acres of Late Successional Reserves and Riparian Reserves.
- ***The Threatened spotted owl is still very much at risk, because the Plan allows old-growth habitat to be cut faster than it will be regrown.*** The owl's habitat is tremendously fragmented and in many places the forest is unsuitable for nesting, roosting, and foraging. The Northwest Forest Plan intends to "grow" more old growth in the LSRs in the long-term, while in the short-term old-growth will continue to be clearcut in the Matrix. The plan cuts down old-growth faster than it can be replaced, so the spotted owl faces increasing risk in the short-term until the LSRs can heal (in 150 years or more). Furthermore, over half of the spotted owls that currently nest on federal lands may not be protected. For instance, of the 541 pairs of spotted owls that inhabited the Willamette National Forest in 1994, only 209 pairs of owls were protected in LSRs and administratively withdrawn areas. The rest were in matrix where their habitat is subject to continued clearcutting. And the USFWS readily approves incidental take permits allowing these pairs' habitat to be destroyed.
- ***Ancient Forest Biodiversity Remains at Risk.*** The Species Analysis Team concluded that populations of about half of the 1,084 species associated with old-growth may not remain viable under the "reserve/matrix" design of the plan, so the plan calls for surveys for these species within

certain time frames and protection of occupied sites. These surveys are not being done as required. On August 2, 1999 Judge Dwyer ruled that the agencies had systematically failed to fulfill this important mitigation requirement. Tens of thousands of acres of proposed harvest are out of compliance.

- ***The Aquatic Conservation Strategy is inadequate prevent the extinction of salmon.*** The Key Watersheds and Riparian Reserves are open to timber harvest. The Plan rejected the recommendations of the best scientists and reduced the initial widths of the Riparian Reserves. (The reserve widths are measured on slope distance rather than horizontal distance which makes a big difference in mountainous terrain.) Now the boundaries are being further reduced based on questionable watershed analyses that often fail to protect potentially unstable land areas (as required by the plan) or recognize the important contribution of these reserves to spotted owl dispersal between the LSRs (as required by the plan). The areas surrounding small wetlands are also not being protected as promised.
- ***The Plan allows continued road building in ecologically critical areas.*** Forest roads fragment habitat, cause landslides, increase blow-down, disrupt migration patterns, increase predator activities, and are the largest single contributor of sediment to our streams. Our forests need not more roads, but a huge campaign of road closures.
- ***The success of the Plan is excessively dependent upon under-funded restoration and monitoring efforts.*** These activities are not being funded at anywhere near the level needed to ensure recovery of ecosystems or inform necessary mid-course adjustments to the Plan.
- ***The Plan assumes we can "create" old-growth habitat from clearcuts.*** No one has ever created old-growth and we should be very humble in our attempts to do so. We cannot afford to keep cutting more old-growth until we know whether it is possible to create it.
- ***Short rotations will sterilize the Matrix.*** The natural condition of westside forests is an ecosystem reset by fire every 200 to 500 years. The short-rotation plan for the Matrix will deplete the soil, homogenize forest structure, eliminate wildlife dispersal opportunities, reduce biodiversity, and establish widespread fire-prone young stands.
- ***The "flexibility" allowed in Adaptive Management Areas is being abused to cut more trees and protect fewer streams.*** Riparian areas are being entered and cut much more frequently in the AMAs.
- ***The Plan creates an unattainable expectation of timber output.*** As the Plan is written, successful implementation of the Plan requires a huge multi-agency federal bureaucracy to completely retool for this new forest plan. In many areas, before timber harvest can occur, the Plan requires detailed analyses of site-specific conditions, such as: Watershed Analysis, LSR Assessments, AMA Plans, and NEPA documentation. The Plan was never going to produce 1.1 billion board feet of timber in the first few years of implementation, and the government should have been very clear about that. Instead they created an expectation of instant timber gratification and in effect created another "train wreck" which resulted in the Rescissions Act "Salvage" Rider of 1995-96.

- ***The so-called "Salvage Rider" has pulled the rug from under the Forest Plan.*** Judge Dwyer said that the Forest Plan was just barely legal and that any additional cutting would violate the law. Well, the rider has caused 10,000 acres of ancient forest to be clearcut - forests that the Forest Plan assumed would remain standing to protect threatened and endangered species. Now those forests are gone.

## **ACTIONS THAT COULD IMPROVE THE PLAN AND ITS IMPLEMENTATION**

- ***Protect all remaining roadless areas, old growth, and native forest*** whether in the matrix, AMAs, reserves, anywhere.
- ***End clearcutting.*** Leave more retention trees in harvest units. New information about soil ecology show a need to maintain more living trees on site to maintain continuous and long-term inputs to the soil food web which will aid biodiversity, forest productivity, and water quality. Retention trees will also help mitigation for wildlife impacts.
- ***End plantation management.*** End 40-100 year rotations. Establish 200 to 500 year rotations.
- ***Close the loopholes:*** No cutting in the reserves. No salvage. No roads. (But consider thinning in stands less than 50 years old that were established after clearcutting.)
- ***Adopt scientific recommendations*** on riparian reserve widths and use horizontal distance (not slope distance) to establish the boundaries.
- ***Restore the plantations.*** Some treatments, if carefully done, might improve the millions of acres of sterile young plantations. Thinning young stands, underplanting diverse species, creating snags, placing large down wood, and prescribed fire might be used to accelerate the creation of old-growth conditions in young plantations. Some people say that the Forest Service and the BLM could stop cutting old growth and get all of their timber volume from a “restoration thinning” program, but we should learn from experiments in the Matrix before we manipulate the reserves. We must also avoid road-building and other negative effects of such projects.
- ***Emphasize monitoring and adherence to minimum management standards in Adaptive Management Areas.*** The privilege of "flexibility" should be reserved for activities that will restore more than they destroy. Adaptive management also requires greater commitment to monitoring. Science-based monitoring must be required in every project in Adaptive Management Areas.
- ***Decouple local government finances from the federal timber program.*** The practice of sharing timber receipts with local governments must be abolished so that communities are not blackmailed into promoting activities that undermine the future economy of the community. Counties with a significant portion of federal land should receive instead stable and direct payments-in-lieu-of-taxes (PILT) from the federal government.
- ***Help workers through the transition to sustainable forest management.*** Redirect federal programs to retrain some workers and provide restoration jobs-in-the-woods to displaced timber workers. Appropriate money for “pure” restoration work that is not tied to timber sales.

- ***End off-budget trust accounts funded from timber sales.*** (i.e. Knutson-Vandenberg, salvage, brush disposal, etc.)
- ***Improve forest inventories.*** Include all special forest products, and non-market forest values in forest inventories.
- ***Establish methods to properly account for costs and benefits*** in making decisions about timber sales. Better accounting is needed for road costs (monetary and ecological), as well as lost "ecosystem services" caused by timber harvest.
- ***Protect and restore municipal watersheds.*** Federal forest lands that contribute to municipal water supplies should be included in the key watersheds.
- ***Initiate a road long-term closure campaign.*** Roads are the number one water quality concern in the forests. A road closure campaign based on ecological priorities would go a long way to restoring fish and water quality.
- ***Allow land exchanges based on sound ecological and economic criteria.*** Land exchanges may make sense in some places to consolidate ownerships or protect sensitive areas, but they must be reviewed and approved after thorough public review and scientific review. Since the public will end up paying for road maintenance and watershed restoration on acquired land, excessive road densities and single-species tree plantations on private lands must be counted as liabilities in the appraisal process and an "ecological balance-sheet" must be drawn up.
- ***End log exports from private lands to make up for declining harvest from federal lands.*** Log exports from private lands exceed the entire federal timber harvest, so impacts from reduced federal harvest can be easily mitigated by reducing log exports.
- ***Prohibit export of minimally processed wood*** from public or private land.
- ***Increase funding for restoration and monitoring.***