

Judging the Effectiveness of the Northwest Forest Plan: Year Eighteen

Ann Forest Burns, Scott Horngren, Ross Mickey, and Tom Partin¹, American Forest Resource Council

We have been asked to share the timber industry's perspective on how effective the Northwest Forest Plan (NWFP) has been since its implementation and whether changes are needed to ensure that its original conservation, social, and economic objectives are met in the future. Obviously, the effectiveness of any plan can be judged only against what the plan was designed to accomplish. The NWFP was an outgrowth of the Forest Ecosystem Management Assessment Team (FEMAT), established by President Clinton after the 1993 "Forest Summit." The President directed FEMAT to develop management strategies for federal forests within the range of the northern spotted owl that would (1) consider human and economic dimensions of the problem; (2) protect the long-term health of forests, wildlife, and waterways; (3) be scientifically sound, ecologically credible, and legally responsible; (4) produce a predictable and sustainable level of timber sales and nontimber resources that would not degrade the environment; and (5) end gridlock and emphasize collaboration among federal agencies.

The "effectiveness" of the NWFP should be judged against these principles. For the reasons discussed below, the industry believes that the NWFP has failed when measured by any and all of the President's five principles.

The NWFP allocated only 15% of the 9.6 million hectares of federal land it covered to multiple use management and set aside 85% for special uses. This drastic reduction in manageable land

reduced the amount of timber available annually from 4.5 billion board feet (bbf) to 1.1 bbf. This reduction in projected timber coupled with the fact that only a fraction of the 1.1 bbf was ever sold led to the closure of 261 mills supporting at least 50,000 jobs in western Washington, western Oregon and northern California. Less than 40% of the projected 1.1 bbf annual harvest has reached mills since the inception of the NWFP. This represents a shortfall of over 9 bbf.

One of the reasons for the shortfall is the unwillingness of federal agencies to implement the Plan as written. The "balance" between social and ecological needs was created by setting aside vast swaths of land for the spotted owl and other "old growth dependent species" in Late Successional Reserves and by keeping some remnant patches of older timber in the manageable land base of the Matrix. These remnant patches formed the majority of the planned timber sale volume for the first decade. Instead of implementing the Plan as written, the agencies decided to focus on plantation thinning, thus avoiding the "controversy" of cutting the very stands allocated to help achieve the economic objectives of the Plan. This shift to small logs increased costs, decreased volume, and eliminated a vital source of timber to over 50% of the then-existing infrastructure designed to use larger logs. The human and economic dimension of the problem and the production of a predictable level of timber sales have been all but forgotten in the implementation of the NWFP.

The President's second directive was to "protect the long-term health of forests, wildlife, and waterways." Judging the effectiveness of the NWFP in meeting this goal depends on what one believes is the best way to accomplish this protection. If one believes that these components of the forest are protected by simply removing human activity, then the Plan has been very effective. If, on the other hand, one believes, as the industry does, that the forest resources can best be protected by reducing wildfire and insect threats to at-risk forests, then the Plan has been very ineffective.

¹ The authors are, respectively, Vice President, Attorney, Federal Forest Manager and President, and can be reached at info@amforest.org. The American Forest Resource Council (AFRC) is an Oregon nonprofit corporation that represents the forest products industry throughout Oregon, Washington, Idaho, Montana, and California. The AFRC represents over 70 forest product businesses and forest landowners, and its mission is to create a favorable operating climate for the forest products industry, ensure a reliable timber supply from public and private lands, and promote sustainable management of forests by improving federal laws, regulations, policies and decisions that determine or influence access to and management of forest lands.

Even with 85% of the land base set aside for spotted owl protection under the NWFP, the numbers of this species continue to decline. The major cause of loss of spotted owl habitat since the inception of the NWFP has been large, severe wildfires, *not* timber harvest. But because the uncut forest continues to grow, there is more owl habitat than ever. Unfortunately, the population of spotted owls continues to decline due to the invasion of the barred owl (*Strix varia*), its larger and more aggressive cousin. The spotted owl cannot be "protected" by simply ignoring the barred owl threat and removing human activities from more land. Populations of other species, such as Roosevelt elk (*Cervus elaphus roosevelti*) and black-tailed deer (*Odocoileus hemionus columbianus*), have decreased dramatically because, without regeneration harvests, the forage created when stands are opened up and pioneer species allowed to grow does not develop.

The threat of uncharacteristic wildfire has also continued to rise as less land area in need of restoration is treated. Hundreds of thousands of hectares within the boundaries of the NWFP are at risk of uncharacteristic wildfires, and this number increases every year. These fires destroy terrestrial and aquatic habitats and in some cases render the land incapable of supporting a forest, at least in our lifetimes. The management agencies' failure to address this major threat, apparently because of the fear of litigation by project opponents, leads to the conclusion that the NWFP has been ineffective in protecting the long-term health of forests, wildlife, and waterways.

The President also wanted the Plan to be "scientifically sound, ecologically credible, and legally responsible." Success in achieving this directive is the hardest to judge. The NWFP was based on a grand scientific hypothesis that the ecological needs of old growth dependent species such as the spotted owl would be met by a vast reserve system spanning three states and the needs of other species outside the reserves would be met by implementing the standards and guidelines of the

Plan. The validity of this hypothesis has recently come into question through the issuance of a Draft Revised Recovery Plan for the spotted owl. In that plan, the U.S. Fish and Wildlife Service appears to have rejected this hypotheses by demanding that human activity be eliminated from all spotted owl sites and high quality spotted owl habitat on both public and private lands. The Draft Revised Plan presents no scientific justification for this new hypothesis.

The President's final directive was to end gridlock among federal agencies. Unfortunately, the NWFP is powerless to force cooperation among the Forest Service, Bureau of Land Management, U.S. Fish and Wildlife Service, National Marine Fisheries Service and Environmental Protection Agency. Each agency has its own statutory mandate which it seems increasingly unwilling or unable to mesh with those of its sister agencies. Section 7 consultation under the Endangered Species Act and the NWFP "Survey and Manage" requirements in particular conspire to defeat the objective of ending gridlock and to, in the words of FEMAT, "make the federal government work together."

In 2003, Dr. Jack Ward Thomas, the principal author of the NWFP, reviewed and commented on whether implementation of the NWFP met its goals. His report, *Sustainability of the Northwest Forest Plan: Dynamic v. Static Management*, should be read by anyone interested in this topic. Industry can only echo Dr. Thomas' closing statement:

"The bottom line is that the NWFP in practice is but a pale imitation of what was advertised in relation to dynamic management. That, coupled with the de facto elimination of the cutting of old growth, has brought both active stand management and timber output to a small fraction of what was anticipated. This is both unfortunate and unwise. *If the NWFP cannot be followed, it should be revised so that the consequences of the status quo can be examined, explained, and considered*" [emphasis added].