

February 28, 2004

U.S. House of Representatives  
Subcommittee on Forests and Forest Health  
Committee on Resources

STATEMENT OF BILL COATES, representing THE QUINCY LIBRARY GROUP

### **Background and Why the Act was Not Fully Implemented.**

The Quincy Library Group agreed on its Community Stability Proposal almost eleven years ago, in 1993. We intended it to be a 5-year demonstration of forest management that would appropriately balance our concerns about fire protection, declining forest health, animal populations, and community stability in and around 2.4 million acres in north-eastern California, on the Lassen and Plumas National Forests and the Sierraville Ranger District of the Tahoe National Forest. The QLG program would bridge the gap, while permanent longer term decisions on these issues were considered and decided in the Forest Plan revisions due to be made under existing law.

After several years of unsuccessful efforts to persuade the Forest Service to implement the QLG Proposal at a reasonable pace and scale, we went directly to Congress, which resulted in passage of the Herger Feinstein Quincy Library Group Forest Recovery Act of 1998. The Environmental Impact Statement required by the Act was completed in August of 1999, and it would have permitted full implementation of the Act, except that the Forest Service attached a crippling “mitigation” to the Decision. As a result, implementation of the HFQLG Pilot Project for the past several years has been severely restricted in its scale, pace, and effectiveness.

During this time the Forest Service also conducted a lengthy “Sierra Nevada Framework” process, within which it began to consider replacing the “mitigation” with practicable standards and guidelines that would actually permit implementation of the HFQLG Act as intended by Congress. However, the Framework process itself took more than five years, from May of 1998 to January of 2004. During this time the HFQLG Act was extended an additional five years. Thus we are only now on the verge of seeing full implementation of the HFQLG Pilot Project.

### **Changes Expected as a Result of the SNFPA Decision.**

The Sierra Nevada Forest Plan Amendment of January 2004 has essentially re-instated the original 1999 HFQLG Decision without the mitigation, so at least on paper the HFQLG Pilot Project can go forward and be fully completed within its extended term. The remaining question – and it is still a significant unknown – is whether the Forest Service actually can and will implement the Pilot Project as intended. At this time, assuring full implementation is still QLG’s main concern. It appears to us to be a better balanced, more reasoned decision than the one issued in 2001. Regional Forester Blackwell provides a clear and well supported set of reasons for making the changes to the Sierra Nevada Framework.

The Plan Amendment is founded upon more rigorous scientific methods with regard to

California spotted owl status assessments than the 2001 decision. This is due to two factors: first, the U.S. Fish and Wildlife Service fulfilled its ESA procedures and concluded that the California spotted owl didn't need to be listed. Second, and more importantly, Regional Forester Blackwell took his own hard look at the body of Forest Service knowledge on the California spotted owl, and when he found it wanting, he brought in expert help. Under his leadership, the owl demographic data sets were verified and standardized, then subjected to the "meta-analysis" techniques developed a decade ago for the northern spotted owl.

The Plan Amendment also does a much better job than the 2001 Framework decision at recognizing the practical realities of forest management as well as at taking a more holistic, long-term, sustainable approach in its management goals.

The new ROD directs field personnel to develop projects that make sense from both an ecological and a financial perspective (it's got to be both, not one or the other).

The new ROD adds the management objectives of reducing stand density for forest health purposes, restoring and maintaining ecosystem structure and composition, and restoring forest lands after severe disturbances. And the new ROD, unlike the 2001 decision, is consistent with the approach recommended by research scientists in the 1992 CASPO Technical Report.

However, the SNFPA Decision also applies to the remaining Sierra Nevada national forests, and the situation for these forests is significantly different from our situation in the HFQLG area. These other forests are governed by a different fuel reduction strategy and somewhat different standards and guidelines, and they generally have forest-related workforces and industrial infrastructures even more adversely affected by previous Forest Service policies and actions than the workers and industries of the HFQLG area. These differences and deficiencies concern us, both out of concern for the health and safety of those forests and the people who use and inhabit them, and because the precedents established in the SNFPA Decision for the rest of the Sierra Nevada will almost certainly have strong influence on longer-term decisions for the HFQLG area.

To be specific, we believe that:

(1) The fuel reduction strategy for the rest of the Sierra Nevada is fatally deficient. The Forest Service is now saying "speed bumps" when referring to its "strategically placed area treatments" (i.e. SPLATs – disconnected overlapping areas of fuel reduction). We do not believe that disconnected area treatments can ever be as effective as the equivalent amount and type of treatments that form a network of continuous strips of treatment. On a street, "Speed Bumps" aren't effective if they don't extend all the way across a road. If there are gaps, people (and fires) will just go through at pretty much full speed.

(2) In any case the required work, even if all efforts are directed at just fuel reduction, cannot be done with the currently available work force and industrial infrastructure, and the necessary economic foundation for an adequate work force and infrastructure cannot be built on the proposed program of fuel reduction. Instead of assuring stability for a forest product industry that needs to be rebuilt and sustained, the recent Decision has simply extended the Forest Service's neglect for more than a decade of its legal obligation to provide a continuous supply of wood fiber. Further consideration of this issue is promised in future Forest Plan revisions, but the recent Decision provides no timber program, and that flouting of the law can only discourage potential investors and

lenders. We can't afford to make potential investors wait around a few more years to see whether the Forest Service will make good on its ephemeral promises.

### **Concerns for the Long Term**

Catastrophic wildfire is without doubt our most urgent and dangerous concern. That is why the HFQLG Act requires the greatest acreage of treatment during the Pilot Project to be fuel reduction in a network of defensible shaded fuelbreaks, what the Forest Service calls Defensible Fuel Profile Zones (DFPZs). We believe that such fuelbreaks, constructed in strips that are as continuous as possible and contain protected roadways, around communities and across the forest, will provide the best defense against wildfire.

However, wildfire is actually a symptom, not the underlying problem. The fundamental problem is that current forests are not sustainable into the future, even if they could magically be protected right now from wildfire. Our Sierra Nevada national forests are overgrown with far too many trees, and those trees are too often not well adapted to survive drought or other adversities in their current locations. Even if these overcrowded stands don't burn, they will wither and die from other causes, such as the insect infestations that decimated large areas near Lake Arrowhead in recent years, and pre-disposed them to catastrophic fire.

The long term change most needed is to *restructure* these forests, not try to preserve them as we now see them. The QLG Proposal of 1993 recognized that the best available models for restructuring modern forests are the pre-settlement forests, as well as we can determine their composition and functions. We are encouraged to see that restructuring is given at least a few favorable words in the recent SNFPA Decision, though it has not yet risen to the level of an action issue.

And of course we can't exactly reproduce the pre-settlement structures and processes. For one thing, fire was the dominant process that shaped pre-settlement forests, and we simply can't employ that much fire, even at low intensity, because of human health and safety concerns. However, we can be adequately certain, based on scientific studies of historic forest structures, species composition, and climate, that pre-settlement Sierra Nevada forests were generally composed of small patches (up to several acres each) of different age trees from patch to patch, and that each patch had many fewer trees per acre than we now find in these forests.

The QLG Proposal suggested that restructuring the forest should be initiated with a program of Group Selection, which would harvest small patches (about 1/2 to 2 acres apiece) at a rate that would establish a long term rotation averaging about 175 years, and regenerate the patches with tree species well adapted to the site. Group Selection is a well-established silvicultural process for growing timber, but with minor changes it could be adapted to produce any desired long term mix of size classes and species among the groups, right up to the oldest possible trees.

A management regime resembling Group Selection – call it forest patch regeneration – would provide a very great additional advantage. The value of the harvest from just a fraction of the landscape in each harvest cycle of 15 or 20 years would pay for concurrent fuel reduction and forest health work on the whole landscape, and probably yield additional revenue to the Federal Treasury as well.

In short, the immediate establishment of a program that will harvest and regenerate small patches of forest is an *ecological* necessity, in order to restructure Sierra Nevada forests to make them fire resilient and sustainable in the long run, and an *economic* necessity in order to have any hope of paying for the huge amount of work that must be done right now and extended into the future.

## **In Conclusion**

Quincy Library Group members are continuing to monitor and "trust, but verify" the Forest Service's implementation of HFQLG projects. The 2001 Sierra Nevada Forest Plan Amendment severely restricted the HFQLG program, especially in the mixed conifer forest zone. Nevertheless, the HFQLG Pilot Project has been a mixed bag of mostly successes but also a few failures. Each problem spot is approached as an occasion for learning, correction, and improvement – and though we sometimes step on a few agency toes, the overall process is the reality of adaptive management. In a growing number of project areas, QLG members are coming home from field trips and reporting that "the world is being set right again." We are hopeful that under this new direction, this trend continues.

We would encourage this committee to continue to insist on frank discussions about pace and scale. In the past we have mistakenly accepted some activity as sufficient activity to solve the problem. You should also understand "how much is growing" in relation to "how much is being removed". Our Sierra-wide density situation is worsening even with the implementation of this amendment. **Let's also give Regional Forester Blackwell full credit for recognizing the problem, and having the courage to take new steps to begin to alleviate the problem of declining forest health.**

Finally, help us to resist the trap represented by "single species" forest management. Many times this has led to the decline of many other less heralded animal populations.