

June 18, 2008

Senator Wyden
Senate
Washington DC

Dear Senator Wyden:

We have reviewed your proposed legislation and we state below our beliefs about its potential implications for restoration of the federal forests of the Pacific Northwest.

Section II of your proposal states its purposes are to:

- Conserve and restore Pacific Northwest forests;
- Create an immediate, predictable, and sustainable flow of timber to support locally-based economies;
- Make Pacific Northwest Forests more resilient to the impacts of climate change and reduce releases of carbon that result from wildfires;
- Protect and restore old-growth stands and trees in the Pacific Northwest, while recognizing the fundamental difference in approach needed for old growth on Moist and Dry forest sites;
- Expedite actions that achieve ecological objectives and provide economic and social benefits;
- Promote collaboration in communities to support natural resource stewardship and economies;
- Plan for managing plantations in Matrix lands for sustained timber production;
- Streamline administrative processes for ecologically-based projects that result in improved forest conditions;
- Conserve aquatic systems and watersheds;
- Prioritize restoration projects in Dry forest stands with uncharacteristic fuel buildups to improve fire resiliency;
- Implement legislation which retains and builds upon the Northwest Forest Plan;
- Provide periodic independent review of agency programs in meeting the goals of the legislation;
- Recognize that the threat to forest health and rural economies has reached an emergency status; and
- Ensure the Federal lands are good neighbors to private landowners.

We believe that these provisions address critical needs in federal forest stewardship that require legislative attention and that they are based on current scientific thinking. Specifically, your proposal incorporates the following approaches that should be effective in reaching your goals:

- Recognizing the fundamental distinctions necessary in policy between Dry and Moist forests of the Pacific Northwest and further recognizing the great diversity in forest conditions by utilizing plant associations as the basic stratification for policy and regulation;

- Incorporating the ecological safety net provided by the NW Forest Plan, even as it provides the leadership for the necessary evolution of the plan;
- Proposing a coherent approach to restoration of sustainable ecological conditions in the Dry forests while accommodating the habitat needs of the Northern Spotted Owl, when present;
- Focusing on increasing structural diversity in the plantations of the Moist forests while also beginning a program of regeneration harvest in these forests that will contribute to structurally-diverse early successional communities and young forests through time;
- Conserving all old growth stands and trees in Moist forests;
- Conserving all old growth trees in Dry forests while recognizing the need to enter the stands where they occur to reduce threats from wildfire and insects; and
- Providing for a sustainable, predictable supply of timber from federal forests of the Northwest over the next few decades at levels higher than recently experienced and providing the foundation for a long-term supply of timber from federal lands.
- Defines an unifying vision for forest management which can bring together people and communities

We further believe that the forest restoration strategy described above will:

- Accelerate the restoration process for federal forests of the Pacific Northwest;
- Greatly reduce the susceptibility of Dry forests --and especially their old growth trees -- to uncharacteristically severe wildfire and insect epidemics;
- Direct activities in Moist forests toward rebuilding structural complexity and developing both early successional and late-successional forest on Moist forest sites and toward more resilient, spatially-heterogeneous forests on Dry forest sites, while protecting existing old growth stands and trees.

Over the next 20 years, the strategy also should provide timber products and income that will:

- Help pay for needed actions;
- Significantly increase current harvest levels on the national forests and slightly increase harvest levels on BLM O&C lands, compared to recent history;
- Make available significant quantities of biomass;

- Assist in the social restoration of many rural communities by providing employment and community engagement in the restoration process;

From 20-40 years into the future, this strategy would continue through:

- Thinning and regeneration harvest in the Moist forests in the Matrix;
- Thinning of plantations in Late Successional Reserves and Riparian Reserves, especially if the upper age limit on that thinning is extended from 80 to 120 years;
- A second cycle of treatments in the Dry forests;

Based on our initial analysis, total annual harvest over the next twenty years on the federal forests of the Pacific Northwest could exceed one billion board feet a year, with about 80 percent of it coming from the national forests and the rest from BLM O&C lands. Slightly more than half would come from Dry forests and the rest from Moist forests. In both Dry and Moist forests, the harvests would come from a combination of innovative thinning and regeneration harvest activities. These calculations exclude all harvest of old-growth forest and trees on Moist forest lands, all old trees on Dry forest land, and any harvest from roadless areas.

It is difficult to discuss harvest levels in detail beyond the first 20 years, although the strategies adopted in the proposal should enable sustained timber production into the future. The level will depend, in part, on markets and social dynamics, on effects of climate change, on new scientific knowledge about forest function, and on many other factors.

There are several challenges in implementing this restoration strategy:

- Investment will be needed. While timber harvest values can help defray costs, they will not be sufficient to cover all the actions needed and the associated infrastructure and planning;
- The Dry forest strategy is an integrated approach that eliminates a division of the landscape into reserves and matrix. This revision will be felt most profoundly in southwestern Oregon where the strategy has been based on that used in surrounding Moist forests. Conserving the Northern Spotted Owl in such environments will take innovative planning and silviculture;
- Restoring forests while simultaneously conserving and restoring the watersheds within which they sit will create both opportunities and tensions. The partial cutting strategy outlined here will require maintenance, use, and repair of the existing road system which carries with it the potential for impacts on aquatic systems; and
- Successfully pursuing a pathway that nourishes all the resources of value on these lands will require professional management of the highest level.

Because of climate change, systematic re-assessment of the proposed restoration strategy will be needed at regular intervals to assess its appropriateness. Your proposal incorporates our current understanding of some expected effects of climate change by proposing:

- Rapid movement through the Dry forests to address the threats to these forests from wildfire and insect threats, since threats can develop very quickly as the result of climate change;
- Grouping of most mixed-severity forests with low-severity (frequent fire) forests as candidates for active management, since we anticipate a shift to more frequent and severe fire regimes with climate change;
- A strategy that will result in a net increase in forest carbon sequestration on federal lands over time;
- Harvest levels that will be substantially less than growth (measured in board feet); On Dry sites the growth will be shifted to into the larger, older, more fire resistant trees. On Moist sites the growth will rebuild the carbon stocks that have been depleted during the last 150 years of western settlement and use;
- A Dry forest strategy that should reduce the area affected by uncharacteristic wildfires, which can result in significant emissions of carbon into the air; and
- Effective utilization of biomass generated by the silvicultural activities to maximize the immediate contribution of Dry Forest restoration to carbon balances.

More generally, we feel that proposal takes important steps forward by:

- Taking old growth “off of the table”, thereby improving public trust in active management actions by the Forest Service and Bureau of Land Management allowing needed programs to restore forests and dependent communities to move forward;
- Focusing on restoring and sustaining ecosystems, incorporating rather than being dominated by efforts that have emphasized singular objectives, whether wood, wildfire fuels, or owls;
- Taking an approach based on comprehensive consideration of the most current science, including that dealing with the uncertainties associated with environmental and social change in the 21st century;
- Calling for independent project review and periodic scientific review of whether agency implementation is meeting the goals of the Act;
- Recognizing the fundamental need to engage the stakeholders in design, implementation, and oversight; and
- Rebuilding the strength and credibility of the Forest Service and Bureau of Land Management, which is critical not only to the immediate forest stewardship needs

but, also, to having alert, adaptive management agencies engaged with our public forest lands in the massively uncertain environmental and social environment of the 21st century.

We applaud your willingness to initiate such a strong and positive contribution towards restoring our federal forests. Please contact us if you have further questions.

Best regards,



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