

Committee on Resources

Subcommittee on Forests & Forest Health

Statement

Testimony Of
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Before
Forest and Forest Health Subcommittee
House Resources Committee
Helen Chenoweth-Hage, Chair
Forest Access field hearing
Hot Springs Convention Center
Hot Springs, AR
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Thank you Representatives Helen Chenoweth-Hage and Jay Dickey for holding this Forest and Forest Health Subcommittee in Arkansas. The management of our national forests is extremely important to the people of Arkansas/Missouri and the nation.

My name is Jim Crouch. I am here today representing the people who buy and process the timber sold from our national forests. I serve as the Chair of the Federal Timber Purchasers Committee, and as the Executive Director of the Ouachita Timber Purchasers Group, the Ozark-St. Francis Renewable Resource Council, and the Mark Twain Timber Purchasers Group. I spent 28 years with the US Forest Service including 8 years as Forest Supervisor before leaving in 1987. My father was a forestry technician with the U.S. Forest Service. So I know both the agency and the industry that I represent here today.

I would like to begin by noting that the Forest Service has issued three separate proposed rulemakings in the past few months that affect road construction and reconstruction on the same lands (proposed planning rule, proposed transportation system rule, and proposed roadless area protection rule). The agency did not provide adequate time for public analysis and comment on any of the three rulemakings, and has refused to grant reasonable extensions of the public comment periods. Furthermore, the Forest Service has acknowledged that the proposed rulemakings are directly related to each other, but has failed to present an assessment of the cumulative impacts to the environment or the economy from implementing the rules. In fact, these proposals seem to envision separate, duplicative processes using an undefined "science-based road analysis," which clearly violates the cumulative impact analysis requirement of the National Environmental Policy Act (NEPA) and reasonable opportunity for comment requirement of the Administrative Procedure Act.

The proposed transportation system rulemaking would trample on the access rights of non-federal

landowners, using misleading road maintenance costs as justification to prohibit new road construction, and imposing new processes designed to delay road construction indefinitely. Since the proposed transportation system rule and roadless area protection rule share the common objective of preventing road construction in roadless areas, they should be merged and considered as a single rulemaking.

In an act that confounds both science and common sense, the Clinton/Gore team has condemned our national forests to a future of neglect. The recent roadless proposal sounds the death knell for the health of our national forest system and signals an attack on the values of rural America. According to the Forest Service, the national forests are experiencing the worst health crisis in history with 65,000,000 acres at catastrophic risk from wildfire, insect infestations, and disease. This represents 1 acre out of every 3 acres of national forest lands. To give you an idea of what this really means - 65,000,000 acres is a land area twice the size of the State of Arkansas.

Yet, rather than embracing a scientific approach to managing these lands, the Forest Service's Draft Environmental Impact Statement (DEIS) would wall-off more than 54,000,000 acres for roadless management.

This assault on public access to our national forests is simply an attempt by an administration in political trouble to trade access to our national forests for urban votes during a Presidential election year. It is the first step in a political effort that I predict will come to be known as RARE III.

The proposal prohibits road building or reconstruction of existing roads on 54,000,000 acres of national forest land. This is an area also bigger than the State of Arkansas.

In addition, the proposal requires each Forest Supervisor during the forest plan revision process to analyze the individual proposed roadless areas under their direction and determine if additional and more restrictive standards and guidelines are needed to protect the roadless characteristics. The proposal further requires the Forest Supervisors during forest plan revision to analyze all land not included in the DEIS (148,000,000 acres) for possible designation as roadless. This is an area almost six times the size of Arkansas!

With Gore pledging to eliminate all future timber harvest from roadless areas, the stage is now set for an all out battle between those who want to use the forests and those who want to preserve (lock-up) the forests for the exclusive use of non-motorized users. Yet, over 90% of the recreation use on national forest lands occurs either on or near forest roads. The agency is caught in the middle with no where to go.

During the late 70's and early 80's, when land management decisions were less controversial and political, the Ozark-St. Francis forest plan cost the taxpayers about \$10,000,000 to prepare and took 10 years. Former Forest Service Chief Jack Ward Thomas was correct when he said, "There is not enough money in Fort Knox." Chief Thomas was talking about the difficulty and cost of implementing the proposed new planning regulations. Add to this quagmire (proposed planning regulations), the additional challenges of an administration dictated RARE III and you can realistically expect unprecedented gridlock, a cost to the taxpayers of billions of dollars in attempted plan revisions, and the loss of billions in future economic and social benefits to communities near the forests.

The roadless proposal was developed in an environmental vacuum, with virtually all input coming from a select few in the preservationist community, primarily the Heritage Forest Campaign, The Wilderness Society, the Natural Resource Defense Council, Earth Justice Legal Defense Fund, the Audubon Society, and the Sierra Club. Representatives from these groups had continuous communication with and access to

the federal employees directly involved in the creation of the DEIS and rulemaking. They provided the government with draft language, legal memorandum, and survey research that was used to justify and frame the roadless area rule. The administration did not even make a token effort to involve other interested parties.

The proposal is fatally flawed. The Forest Service must withdraw it! The DEIS fails to include a reasonable range of alternatives. It glosses over the environmental impacts by failing to evaluate individual areas. This violates the National Forest Management Act (NFMA) and the Multiple-Use Sustained Yield Act (MUSYA). It is ironic and revealing that the agency would make a decision affecting 54,000,000 acres with less site specific information than a District Ranger collects before deciding whether or not to build a ½ mile hiking trail.

The DEIS misrepresents the social and economic impacts. Contrary to what the statement says, the proposal will eliminate or gridlock most previously viable forest programs. For example, while timber sales are not explicitly excluded in the proposal, it is unrealistic to expect that helicopters or cable skidding systems can be economically substituted for skidders in the east and intermountain west.

The proposal uses the current level of timber sales (about 1.5 billion board feet in FY 2000) for calculating social and economic impacts. This is unrealistic! The current forest plans, as approved and amended by the agency, provide for a 7 billion board foot sales program. This figure should be used as the baseline for calculating impacts.

The proposal fuels the current forest health crisis rather than helping to abate it! Many of the high-risk areas are located within the 54,000,000-acre roadless proposal. Many other areas will be found in the yet to be identified unroaded areas. Without roads and fuel reduction, the forest health crisis will continue to intensify. Congress will be asked to appropriate ever increasing amounts for fire suppression and private property owners will experience increased risk and costs through fire caused losses. Ecosystems will suffer major damages from stand replacing wildfires and the heavy runoff, which accompanies these catastrophic fires.

Finally, the proposal makes a mockery of the NFMA and the planning regulations. It overrides the 124 forest plans that the agency approved after spending millions of taxpayer dollars and involving thousands of hours of public input in their development. This "top down one size fits all" decision making reflects the beltway mentality which says Washington knows best. It sends a powerful message to us the stakeholders, saying, "you are wasting your time working on forest plans."

I would like to call your attention to a brochure just released by the American Forest & Paper Association called "New Federal Forestry - A Scientific Approach to National Forest Management." New Federal Forestry is an alternative to the current Forest Service management philosophy of benign neglect. We believe that active management is much better than simply watching nature take its course. The goal of New Federal Forestry is the sustained, long-term health of the forested landscape, based on scientific research, with a balance between ecological objectives, economic sustainability, and social needs. New Federal Forestry seeks to focus land management decision making at the local level in a collaborative manner. We hope that Congress and the American people will examine the New Federal Forestry proposal and agree that this is the way that our national forests should be managed

In summary, I urge the agency to withdraw this proposal, subject itself to the laws and regulations that govern the Forest Service, move away from the Washington knows best mentality, and accept the current

forest planning process as the lawful and legitimate way for making decisions about our national forest lands.

I'll be glad to answer questions at this time. Thank you!

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