Testimony to the House Subcommittee on Forests and Forests Health

Field Hearing:

Crisis on the National Forests: Containing the Threat of Wildland Fire

to the Environment and Communities – March 7, 2003

given by

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Chairman and Members of the Subcommittee, thank you for the opportunity to testify here today. My name is Brad Ack and I am the Program Director at Grand Canyon Trust. Grand Canyon Trust is a regional conservation organization dedicated to the protection and restoration of the canyon country of the Colorado Plateau. We have a long and proud history of seeking pragmatic solutions to difficult environmental problems.

The Trust has been proactively working to restore degraded and fire prone forests in northern Arizona since 1997. We are very concerned about the risks of catastrophic, or stand replacing fires in this region as they have the capacity to destroy all that we work to conserve. Our efforts on forest restoration include founding the Grand Canyon Forests Partnership (now the Greater Flagstaff Forests Partnership) in cooperation with the US Forest Service in 1997 and subsequently becoming involved in all aspects of ecological restoration—from project design, implementation and monitoring to hiring thinning contractors and providing low-interest loans to local small-diameter wood processors.

Grand Canyon Trust holds seats on the Greater Flagstaff Forests Partnership's corporate and advisory boards and serves on the Arizona Governor's Forest Health/Fire Plan advisory committee and Northern Arizona University's Centennial Forest's advisory committee.

The following testimony is based on our empirical knowledge of what's needed to increase the scale, pace, and quality of ecological restoration in degraded southwest ponderosa pine forests.

This testimony will address (1) causes and symptoms of the current ecological situation, (2) what we should do about it, (3) how we get there from here, (4) obstacles we've encountered and solutions to these obstacles. This testimony is based directly on our six years of experience to achieve forest ecosystem restoration in the ecological, social, and economic environment of northern Arizona. It may or may not be applicable to other parts of the country with different ecological, social, and economic circumstances.

I. There is indeed an ecological crisis in the Ponderosa pine forests of the Southwestern United States.

The causes of this ecological crisis include fire exclusion due to removal of fire-carrying grasses and forbs by livestock; active fire suppression; removal of the dominant old-growth forest structure; predator extirpation; and road building.

The symptoms of this crisis include dangerous accumulations of hazardous fuels; high densities of small trees; too few large and old trees; declining native biological diversity; and increasingly large and severe fires affecting human and ecological communities. Severe fires are but one symptom, albeit the most obvious, of an ecosystem in rapid decline.

II. What Do We Need to Do About This Problem?

We need to place an extremely high priority on restoring degraded and fire prone ecosystems. Ecological restoration is the process of assisting the recovery of an ecosystem that has been degraded, damaged or destroyed. We urgently need to undertake that process at a scale that is commensurate to the degradation and fires we are now witnessing in Southwest ponderosa pine ecosystems.

Ecological restoration is not necessarily synonymous with fire prevention or fuels reduction; research has shown that different types of fuel reduction treatments can have different consequences for fire behavior, biodiversity, wildlife habitat, tree vigor and forest health. Except in areas immediately adjacent to communities, fuels reduction strategies need to be consistent with broader ecological restoration goals including conserving the diversity and resilience of native plant and animal communities, safely re-establishing the natural variability of fire regimes and tree recruitment, and facilitating the development old-growth forest structure. Ecological restoration should also entail rehabilitation and protection of rare and rich biological communities like springs, riparian areas, and meadows.

Effective solutions address both the symptoms and causes of a problem; reversing the declining health of southwest ponderosa pine ecosystems must also include taking a hard look at those activities that may be contributing to further decline such as livestock grazing, road building and road management, and recreation management. If we are serious about restoring these forests, we need to deal with the fundamental causes of their decline, and not just the symptoms. We should not repeat the actions that got us to this point in the first place.

III. How Do We Get There From Here?

Our experience in the Greater Flagstaff Forests Partnership indicates that in order to be successful, ecological restoration must be ecologically sound, scientifically defensible, socially acceptable, and economically viable. Some key elements of a successful restoration program include:

§ Participatory processes based on involving a diversity of stakeholders;

§ Developing and then working from a common ecological, social, and economic vision;

§ An adaptive management framework with clear science-based guidelines by which to monitor, evaluate, design, implement and improve treatments;

§ Erring on the side of caution when faced with uncertainty;

§ Focusing on areas of broad agreement, or “the radical center”: for example, we have very broad agreement to do restoration in this forest type when thinning is limited to young trees smaller than 16” dbh.

§ Congressional, state, local, university, and non-governmental support of community-based restoration efforts.

IV. What Are the Main Obstacles We Have Encountered?

1. Our experience indicates that agency management of the NEPA process, rather than the regulatory environment of NEPA itself, is a problem.

There are systematic management and personnel problems within the Forest Service unrelated to the regulatory environment of NEPA that affect the quality, effectiveness, and efficiency of planning. These include (1) fragmented and delayed analyses due to personnel transfers and/or re-assignments (most notably to fight fire); (2) inadequate staffing levels and prioritization; and, (3) lack of relevant expertise (law, conservation biology) utilized during the planning process.

These problems result in (1) extremely slow execution of the NEPA process, (2) avoidable mistakes that subject decisions to legitimate and time-consuming appeals and litigation and (3) analyses that are marginally commensurate to the guiding intent of NEPA or to contemporary principles of conservation science.

Our purpose here is not to be overly critical of the Forest Service. Our purpose is to provide an honest assessment so that appropriate solutions may follow. Until these problems are resolved and careless

mistakes are prevented, well-intentioned projects will continue to be legitimately appealed, litigated, and delayed—regardless of the regulatory environment in which they occur. Changing or circumventing regulations will not prevent careless mistakes or the appeals and/or litigation that result from them.

Our oral testimony will detail two cooperative projects between the Coconino National Forest and the Greater Flagstaff Forests Partnership that exemplify these problems. The first of these, the Kachina Village Forest Health Project, has taken two entire years to move from initial scoping to final EIS. The second, the Fort Valley Ecosystem Restoration Project, was riddled with avoidable mistakes that resulted in two successful appeals and one successful lawsuit.

Our recommendation: Do NEPA correctly according to existing regulations and authorities by creating a regional NEPA teams whose sole purpose is to ensure efficient, high-quality NEPA analyses for ecological restoration and fuels reduction projects. Such teams would consist of experts solely dedicated to executing NEPA analyses and decisions who would not be available for other duties such as fire assignments.

Our recommendation: Utilize new data and tools for computer-based mapping that can clarify scientific uncertainty, place restoration projects within a larger ecological context, and when employed in NEPA analysis, enhance the quality and transparency of analyses underpinning decisions, thereby also advancing public understanding, dialogue, and support of restoration efforts.

Fires are now occurring at the landscape scale. We need to conduct analyses at similar scales, using the best available science to strategically prioritize restoration projects and understand their effects within a landscape context. Better science will not slow down the process of restoring and protecting our forests. To the contrary, it will allow us to increase our ability to think bigger and think better at the same time.

Thanks to support from Senator Jon Kyl and the Northern Arizona University Ecological Restoration Institute, Northern Arizona University's Sisk Laboratory for Conservation Biology and Landscape Ecology is developing such a capability for Southwest ponderosa pine forests.

2. Lack of markets for small diameter wood

While restoration cannot be expected to fully pay for itself, offsetting the costs of implementation by creating value from small logs can determine the economic viability of projects. Our experience clearly indicates that without the development of a new sector based on the utilization of small diameter wood in the Southwest, we will not get the restoration work done at the scale and pace we need it to be done, and the Forest Service will continue to need to cut large trees to finance fuels reduction work. This is certain to cause serious conflict and delay, while also being unjustifiable ecologically.

Our recommendation: Create a Small Log Enterprise Development Center to provide financial and technical assistance to nonprofit organizations, small enterprises, and individuals throughout Northern Arizona to promote the creation of enterprises that use, and provide value-added processing for, small diameter logs that are removed from covered forests through fire risk reduction and forest restoration efforts. Help to create an adequate site for such businesses to co-locate and share infrastructure resources. Without government assistance, private sector money is unlikely to flow into this needed enterprise.

These recommendations are the subject of a draft piece of legislation formulated by the staff of Senator Jon Kyl and ourselves. It is entitled the Forest Health, Restoration and Small Enterprise Development Act.

Thank you for inviting me to speak in front of the committee today.