Committee on Resources,

Subcommittee on Forests & Forest Health

forests - - Rep. Scott McInnis, Chairman
U.S. House of Representatives, Washington, D.C. 20515-6205 - - (202) 225-0691

Witness Statement

Biomass and Hazardous Fuels Treatments Threaten to Promote Unsustainable Logging on the National Forests
Draft Testimony Before the House Resources Committee
Steve Holmer, Campaign Coordinator, American Lands Alliance
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INTRODUCTION

In response to the wildfire season last year the Forest Service has announced a new National Fire Plan which the agency is using to justify a massive increase in yearly Congressional appropriations to pay for more mechanical fuels reduction treatments and more commercial "thinning" projects. The Plan sets the stage for the industrialization and mechanization of forest restoration by advocating a massive ten to fifteen year hazardous fuels reduction program that will eventually affect most National Forests. Without additional analysis, development of criteria and environmental safeguards, we are concerned that forest ecosystems will be put at risk by mechanical fuels reduction projects.

HAZARDOUS FUELS PROJECTS LACK ENVIRONMENTAL SAFEGUARDS

There is a real risk that ecologically harmful projects will be common place because there are no safeguards to exclude projects from roadless, old growth, and other ecologically important areas that don't need fuels reduction treatments. Projects are already emerging and there is growing concern about the emphasis on commercial commodity production and the lack of emphasis on doing projects -- where the work needs to be done -- in the urban/wildlands interface.

ROOT CAUSES NOT BEING ADDRESSED

According to a Dec. 5 Congressional Research Service report "Forest Fire Protection," historic grazing and logging practices (by encouraging growth of many small trees) and especially fire suppression over the past century, appear to have contributed to unprecedented fuel loads in many areas. However, under the current Fire Policy, it appears that grazing is being ignored and that more logging (mechanical fuels treatment) and fire suppression are being prescribed as the solution. This contradicts common sense and will in the end lead to further degradation of forest ecosystems. If we are to seriously talk about how to restore ecosystems it is necessary to reform the logging, grazing, and fire suppression programs that are at the root of poor ecosystem conditions.

URBAN/WILDLANDS INTERFACE UNDEFINED

An issue that is of primary importance in the Forest Service's presentation of the National Fire Plan is their unwillingness to define the urban/wildland interface zone. The Forest Service has failed to set hard criteria about how to choose the communities in most need for fuels reduction. One of the major components to the

National Fire Plan is to carry out most of the first and second year projects in the communities most "at risk." However, the communities that the Forest Service is evaluating as the most "at risk" comes from a laundry list of communities published in the Federal Register on January 4, 2001. The Governors and the National Association of State Foresters created this community list without any criteria about what a community at risk is.

We are very concerned that to date, the Forest Service has ignored the intent of Congress to focus fuel reduction projects on the urban/wildlands interface to save lives and property. Instead, the Forest Service recently admitted that only 25% of the current projects are in the area they define as the interface/zone. In addition, we are also concerned that the definition being by the agency is overly broad by including power lines, roads and other structures.

INCREASED PRIORITY NEEDS TO BE PLACED ON PROTECTING COMMUNITIES

Homeowners must be educated about the danger associated with the wildland-urban interface zone and the necessity to do their part to reduce the risks. Jack Cohen, research scientist at the U.S. Forest Service's Fire Sciences Lab in Missoula, Montana, has demonstrated that to reduce fire risks in the urban/wildland interface zone, removing fuels from within 40 meters of a structure and reducing the flammability of the structures are more effective and efficient than landscape wide thinning. According to Cohen, "The evidence suggests that wildland fuel reduction for reducing home losses may be inefficient and ineffective. Inefficient because wildland fuel reduction for several hundred meters or more is greater than necessary for reducing ignitions from flames. Ineffective because it does not sufficiently reduce firebrand ignitions."

Congress should encourage state and local governments to require homeowners living in the interface zone to protect their own private property through common- sense fire safety practices, such as the use of fire-resistant roofing material and the clearance of brush and other flammable materials near homes.

CONDUCT ECOLOGICAL ASSESSMENTS FOR ALL FUEL REDUCTION PROJECTS

The Forest Service should be required to identify restoration priorities before any restoration or fuels reduction activities take place. This assessment should involve the public and provide a broad array of alternatives - not just commercial thinning - to address priority needs in the area. For many areas, removing roads, invasive species, and cows combined with prescribed burning would the best prescription for ecological restoration.

HAZARDOUS FUELS PROJECTS SHOULD NOT MIX WITH THE TIMBER PROGRAM

We are concerned that fuels reduction projects are being conducted as part of or conjunction with timber sales. This could allow funds intended for fuels reduction to be used to subsidize logging on the National Forests. Mixing these funds, are allowing for the appearance that hazardous fuels reduction is being used to bolster the timber program could ultimately undermine public support and the program's effectiveness.

Attached to this testimony is a sign on letter endorsed by over seventy-five national, regional and local environmental and grassroots forest protection groups urging environmentally responsible direction for the FY 2001 fuels reduction funding. It represents a consensus from the environmental community on the types of projects we will support. Projects that fall outside of these guidelines are considered fair- game by environmentalists for protests, appeals and litigation.

Congress should prohibit the use of commercial timber sales and stewardship contracts for hazardous fuels reduction projects. Commercial logging removes the most ecologically valuable, most fire-resistant trees, while leaving behind highly flammable small trees, brush, and logging debris. The use of "goods for services" stewardship contracts also encourages logging larger, more fire-resistant trees in order to make such projects attractive to timber purchasers. The results of such logging are to increase fire risks and fuel hazards, not to reduce them. The financial incentives for abusive logging under the guise of "thinning" must be eliminated.

ESTABLISH SEPARATE CONTRACTS FOR FIRE HAZARD REDUCTION PROJECTS

All fuels reduction projects should be paid for with appropriated dollars. Any material of commercial value must be sold in a separate contract and all revenues must be returned to the Treasury. This would eliminate the current incentive to include larger, more valuable, fire-resistant trees in order to make timber sales a.k.a. "fuels reduction projects" more attractive to timber companies.

COMMERCIAL LOGGING INCREASES FIRE RISK

There is strong evidence that commercial logging increases fire risk. According to the Congressional Research Service, the remaining limbs and tree tops or slash substantially increase fuel loads on the ground, at least in the short term, until the slash is removed or disposed of through burning. The government's Interior Columbia Basin Management Project found that logging slash increased fire risk for up to thirty years. The Sierra Nevada Ecosystem Project confirmed that commercial logging had been the single greatest contributor to higher fire risks in the region stating, "Timber harvest, through its effects on forest structure, local microclimate and fuel accumulation, has increased fire severity more than any other recent human activity."

POST FIRE SALVAGE LOGGING SHOULD BE PROHIBITED

There is no scientific evidence that post-fire salvage logging reduces the future risk or severity of wild fires. There is also substantial evidence that this form of logging causes significant environmental harm by disturbing already impacted soils and vegetation, removing canopy cover, removing woody debris needed to create new soils, harming wildlife and plants that depend on recently burned areas. Post-fire salvage logging should have no place in the hazardous fuels program. The 1995 report, "Wildfire and Salvage Logging, Recommendations for Ecologically Sound Post-Fire Salvage Management and Other Post-Fire Treatments" known as the Beschta Report found considerable evidence that post-fire salvage logging would likely result in persistent, significant adverse environmental impacts. The Beschta Report was prepared by an expert team of agency and university scientists and was endorsed the Forest Service. The report recommends the complete prohibition of salvage logging in severely burned areas, on erosive sites, on fragile soils, on steep slopes and any other sites where accelerated erosion is possible.

The Six Rivers National Forest has released a Draft Environmental Impact Statement (EIS) outlining a proposal to salvage log in the 1999 Megram Fire area west of the Trinity Alps Wilderness. The proposed "Fuels Reduction for Community Protection-Phase I" project would log approximately 1,050 acres of ancient forests in the Mill, Horse Linto, Sharber, and Quinby Creek watersheds, including within unprotected roadless areas. Approximately 0.4 miles of new temporary roads would be constructed, and another 2.65 miles of previously used roads would be reconstructed, to facilitate the logging.

Despite the name, the project has nothing to do with either fuels reduction or community protection. The

proposed logging and road construction is located miles away from any community, and will more likely increase the risk of fire rather than decrease it. The forests and streams in the area provide critical refuge for a host of plants, fish and wildlife species, including rare orchids, salamanders, northern spotted owls, goshawks, fishers, steelhead, chinook, and coho salmon. The proposed logging and road construction threatens to severely impact these species, as well as domestic water supplies in Hoopa and other Trinity River communities.

To avoid citizen challenges, the Six Rivers NF has announced that it is seeking an "Emergency Situation" determination that would exempt 863 acres of the project from the appeals and litigation process. The Six Rivers NF is claiming that unless an emergency situation is declared, the administrative appeals process could prevent them logging for another year, at which point the burned trees would be so decayed that it would not be economical to log them. The Six Rivers NF is attempting to circumvent the ability of citizens to force the agency to obey the law, and are using a thinly-veiled "emergency" to get the cut out.

There is no need to log within the Megram Fire area. The agency should instead work to restore past impacts the area from logging, roads, grazing, and fire suppression. The Forest Service should also withhold the emergency exemption for the proposed timber sale. There is no "emergency" in the area, the only reason the Six Rivers NF is seeking the exemption is for economic purposes, and that the proposed exemption would seriously undermine the public's trust in the agency.

ENVIRONMENTAL LAWS AND PUBLIC PROCESSES MUST BE FOLLOWED

Environmental laws, the NEPA process or ESA consultation should not be suspended, expedited, or streamlined. According to the Congressional Research Service, the extent to which fuel management might reduce the extent, damage and control costs of wildfires has not been precisely quantified. Given this uncertainty and lack of scientific evidence that mechanical fuels reduction benefits forest ecosystems, it is necessary that a complete review of each project take place. Streamlining laws and shutting the public out of these projects will only lead to mistrust and a greater likelihood for public opposition, appeals, and litigation.

ROADLESS AREAS AND FIRE RISK

The roadless policy contains broad exemptions for fuel reduction and restoration projects and the Forest Service has testified that the roadless policy will not prevent the agency from meeting its fire fighting responsibility. In addition, agency research indicates that roadless areas are in general not the areas most at risk and contain few communities nearby. In addition, increased human access leads to more fire ignitions -- 88% of the fires from 1988-1997 were caused by humans, with only 12% caused by lightning. Scientific analysis of the 2000 fire season revealed that the vast majority of burned acres were located in previously logged and roaded areas, not in roadless or wilderness areas.

Biomass Power Generation The American Lands Alliance views the combustion of agricultural and urban wastes to generate electricity as a potentially promising source of closed CO2-cycle power. The use of trees for this purpose, however, may pose many problems. We are opposed to any biomass proposals that involve the chipping of whole trees or the degradation of forest or other natural ecosystems. The growth of biomass for power generation should not result in harm to intact, recovering, or potentially recoverable natural ecosystems.

Practices and outcomes that should not be part of the production of biomass for power generation include:

1. The harvest of natural ecosystems, e.g. primary or second growth natural forests.
2. The conversion of natural or recovering natural ecosystems to plantations, or of lands that are plausibly candidates for recovery.
3. The use of whole trees for biomass power generation.
4. The shortening of the rotation interval between timber harvests.
5. The increased use of herbicides, pesticides and fertilizers to accelerate the growth of trees, as these chemicals are likely to degrade water quality and ecosystem function, and to threaten populations of native fish, wildlife, and plants.
6. The use of genetically modified trees and/or invasive tree species. The ability of invasive species to harm natural ecosystems is well established. The impacts of genetically modified trees have not been adequately assessed, particularly in regards to their invasiveness potential, effects on the food chain, and possible unforeseen impacts.
7. The degradation of soil through erosion or other processes.
8. Negative impacts on the amount, timing, temperature, sediment load, and other measures of the quality of natural bodies of water. Some candidate tree species for biomass power generation are said to require intense irrigation.

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