

# Committee on Resources

## Subcommittee on Forests & Forest Health

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### Witness Statement

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Testimony before the House Committee on Resources,  
Subcommittee on Forests and Forest Health  
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The FSX Club of Washington D. C. consists of over 160 Forest Service Retirees in the Washington D.C. area. We are an organization of highly trained research scientists, forest managers, biologists, engineers and other specialists with, collectively, thousands of years of experience in planning and managing the resources in the National Forests. Our group, thus, has a unique understanding of the art and science of planning and implementing the many facets of land and resource management on the National Forests. Many of us were pioneers in forest management planning, from early timber management plans, through the Ranger District Multiple-Use Plans under the Multiple Use-Sustained Yield Act, to the Land and Resource Management Plans required by the National Forest Management Act.

There is a fundamental fallacy embedded in the proposed rule that introduces the assumption of historical steady-state environmental conditions. Specifically, the fallacy consists of the idea of using an historical range of variability of conditions as a measure of ecosystem integrity [219.20(4)]. The proposed rule calls for "estimates of historical range of variability of ecological conditions", and then to compare current conditions to the distribution of these historical conditions. The estimates of historical conditions would be snapshots in time, so to speak. These could very well be times of the dinosaurs, of the ice age, of woolly mammoths and saber-toothed tigers, as well as those subsequent to the Asian migration. More recently, both the biological resources and the growing environment have been greatly modified over the last 200 years.

There is no record in science of steady state ecological conditions in the North American continent (or anywhere else, for that matter). Even if there were, the laws of physics tell us that time progresses one way. Returning to an earlier state of development is not possible. Numbers of people, Pleistocene and other extinctions, introduced species, climate changes, geological events and other events clearly demonstrate that the world is what it is and proceeds according to certain natural laws, given current and future environmental situations. It can never be put back to earlier conditions, even in the unlikely event that scientific ingenuity could describe them. The idea of a past golden age of ecological stability is romantic nonsense, and any reference to such a benchmark should be dropped.

The keystone of the proposed rule is the concept of ecological sustainability, which would become the preeminent objective of managing National Forests. Ecological sustainability is not only inadequately defined in the rule it also has little basis in science. Furthermore, the idea violates the laws governing the protection and use of the National Forests: the Organic Act, Multiple Use-Sustained Yield Act, and

## National Forest Management Act.

The proposed rule clearly states that the "First Priority" is maintenance and restoration of ecological sustainability (219.19). As written, this is a constraint that must be met before social and economic sustainability may be considered. Chris Wood, Senior Policy Advisor to the Chief of the Forest Service, reinforced this concept in a letter in the April 16, 1999 issue of Science Magazine: "Ecological sustainability frames the decision space from which we make economic and social choices". Thus, only after ecological sustainability is assured is the planner permitted to consider economic and social sustainability.

No provision is made for evaluating tradeoffs and opportunity costs until a preconceived (but scientifically inadequate) notion of ecological sustainability is satisfied. This is inconsistent with existing law, as well as generally accepted practice. Indeed, sustainability is defined in current law (MU-SY Act) as sustainability

of identified outputs, and, in emerging international consensus, as based equally on a composite of social, economic and ecological considerations.

The proposed rule is the very antithesis of the current planning regulations, but they both have a serious shortcoming: They bite off more than existing science and practice can chew. The old regulations require complex objective analysis through computer modeling and quantification that, among other problems, too often far surpassed the reliability of the available resource data. The proposed rule, by surpassing the capacity of available science and current practice, descends into pure subjectivity, looking for solutions through use of deductive rhetoric rather than science and disciplined analysis. This purely qualitative approach focuses on defining a policy goal without providing clear direction of how to get there. It is sure to create as much confusion and contention as did the existing rule. A more rational process would be to use a reasonable mixture of quantitative and qualitative analysis, blending sound science and state of the art management.

The proposed rule should be modified so that forest planning is based on known and proven biological sciences and site-specific forest management experiences. No two forest sites are the same in terms of their biological composition and history. Planning must also reflect our ability to meet our national needs while still maintaining healthy forests for future generations.

Many of us experienced difficulty implementing the existing planning regulations. Ten years expired after the regulations were published before there was clear enough planning direction on how to interpret the

regulations and get on with completing the plans. Those were the days when many National Forests were fully staffed with specialized experts. Today's National Forests, after downsizing, mass retirements, and

severely reduced planning budgets, are to a point where many lack even the basic skills for forest management. The Forest organizations are generally not prepared to take on the problematic and complex job of implementing these proposed rules. They need to be clarified and simplified, or a repeat of the last planning debacle will ensue.

As proposed, the rule will certainly absorb countless hours and fruitless dissipation of Forest Service energy. It has little chance of implementation, and it will generate endless contention and litigation. The theoretical basis for the rule, ecological sustainability, is mostly philosophy with little scientific merit. It is essential first to understand our current level of knowledge of the biological basis of forest sustainability and the social and economic demands on this finite resource.

Ecological management as defined by the Committee of Scientists, and included in this rule, is not a scientific based form of management but a philosophical approach. The FSX Club of Washington D. C. strongly urges that the proposed rule be withdrawn. The Forest Service should develop a new proposal drawing upon scientists, planners, resource specialists and forest managers experienced in the actual conditions facing the National Forests.

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