

forest **GUILD**

Position Statement:

Federal Environmental Rollbacks

Environmental Policy on the National Forests: Change the Outcomes, not the Process

Approved by the Guild Board May 2003

Summary:

The Forest Guild, a national organization of foresters and allied natural resource professionals, opposes procedural changes proposed by the Bush Administration to streamline project planning and approval within the National Forest System, because:

- 1) the proposed changes fail to address substantive shortcomings in management strategies and
- 2) the proposed changes fail to restore public trust in agency decision-making.

Environmental review under the aegis of key federal laws is the safeguard against resource exploitation.

Scapegoating the Review and Appeals Process

The Guild believes that fuels management is an extremely important issue challenging the forestry profession. The quality and effectiveness of the response of the forestry profession poses enormous ramifications for the long-term condition of forest ecosystems and forest communities, as well as for the profession itself. To maintain professional credibility, fuels management must be approached gravely and thoughtfully, not cavalierly. While recognizing difficulties arising from the cumbersome nature of federal environmental requirements, the Guild sees the planning process as enhancing the opportunity to come up with the best answers for forest management. The Guild believes that effective fuels management projects should:

- be designed with a clear focus on fuels management in areas of risk,
- have an experimental design that preserves future options,
- give attention to extended follow-up activities including prescribed burning and treatment monitoring, and
- contain substantive public input.

The Guild believes that fuels management projects planned and implemented within these guidelines are achievable and pose the best hope of long-term security for forest resources and forest communities.

The Bush Administration, however, claims that gutting landmark environmental protection legislation such as the National Environmental Policy Act (NEPA), the National Forest Management Act and the Endangered Species Act is the key to successful fuels management on the National Forests. For example, the Administration claims that compliance with NEPA delays fuel reduction treatments, thus increasing risk to lives, property, and forest resources. Various changes to NEPA procedures have been proposed, including exemption of specific projects from environmental reviews and judicial appeals, as well as restrictions on time and eligibility requirements for public comment periods. However, the procedural changes proposed would affect public input into all resource management projects covered by NEPA, not just those that narrowly address fuel reduction treatments. Moreover, proposed changes to environmental regulations attack public review processes generally while failing either to address common concerns that lead to appeals or to lay out a credible management strategy for addressing the fuels issue.

Building Policy on Flawed Assumptions

The Administration's call for a "common sense" approach, involving substantial procedural streamlining outlined in the Healthy Forests Initiative, appears to be predicated on assumptions that National Forest management is now focused exclusively on fuels management, that the understanding of and commitment to effective long-term fuels management is solid, and that public review requirements are being abused to stonewall such agency efforts to protect public resources. None of these assumptions is correct. In fact:

- A key Forest Service report that purported to demonstrate that numerous proposed fuel reduction treatments were stymied by appeals was debunked in a review by Forest Trust. The review documented wide discrepancies in categorizing and reporting forest management activities and project appeals on public lands, and highlighted the fact that many proposed sales in effect emphasize commercial timber harvest.
- The experience of Guild foresters with proposed National Forest fuels treatments indicates a lack of comprehensive, long-term silvicultural planning for fuels management, including prescribed burning, pre-commercial thinning and control of grazing. Failure to address such issues could easily open the door for the re-creation of overstocked forests and other problems the Administration ostensibly seeks to resolve. This is exactly the sort of issue that environmental review processes serve to identify and highlight in order to ensure successful long-term management.
- Serious shortcomings have been identified in the condition class system in place to prioritize projects, which could result in roadless areas being identified as appropriate subjects for fuels projects.
- A recent study by Northern Arizona University showed that appeals of federal timber sales have been downward trending in recent years.

Given these facts, common sense would suggest keeping environmental review processes in place.

A Real Common Sense Approach

Common sense dictates that, to be credible and effective, people and agencies act in a way that engenders trust and confidence. In so doing, even when there are specific disagreements, the long-term productive relationship continues. The appropriate course of action for federal agencies is to restore steadily eroding public trust through transparency and demonstrated integrity in project intent, development and implementation, thereby reducing controversy, concerns and appeals and increasing project completion rates. The Bush proposals will not achieve broad consensus and public support.

Fire risk reduction projects should clearly focus on community protection. Such projects should avoid treatments in roadless areas – thus conducting much-needed work while staying away from project elements most likely to draw controversy.

Dialogue on improving environmental policy development and implementation must rise above the current process-oriented fights and, with openness and appropriate sideboards, establish a foundation of mutual accountability upon which management strategies for the long term health and sustainability of forest ecosystems can effectively be built.

The Guild sees the successful design of fuels management projects and comprehensive forest restoration approaches as a key opportunity to demonstrate the value and effectiveness of forestry and professional foresters to our society. We feel that the direction the Administration has adopted risks furthering the erosion of credibility suffered by the forestry profession over recent decades. As professionals, we insist that the Administration optimize support for appropriate and effective fuels management that best serves the forest and the American public. The proposed "environmental rollbacks" constitute a wholly inadequate and deeply flawed strategy for accomplishing this goal.