

**Statement of
Eric Holst for the
Forest Guild
Submitted to the
Subcommittee on Forests and Forest Health
House Resources Committee
November 10, 2005**

**Regarding H.R. 4200
Forest Emergency Recovery Research Act**

Mr. Chairman and members of the Committee, thank you for the opportunity to provide testimony on the restoration of forests after catastrophic events. I am the Director of the Pacific Coast Program for the Forest Guild, a national organization of foresters and natural resource professionals dedicated to promoting excellent forestry. The Guild has a membership of more than 300 professionals who manage 42 million acres of forest in the United States and Canada. These members include foresters who work for small and medium size companies that own forests and mills; state land managers who oversee forest operations on large tracts, such as the Baxter State Park in Maine; foresters who manage lands for investment companies (called TIMOs); and many consulting professionals who advise and assist private landowners to care for their forests and derive income from them.

The Guild's members share a commitment to the organization's mission of promoting forestry that sustains ecosystem integrity and human communities that depend on forests. Our position on policy regarding post-fire salvage logging and restoration treatments is driven by the practical experience of our members and our founding principles which hold that responsible forest management imitates nature's dynamic processes and minimizes impacts when harvesting trees and other products.

The Forest Guild's supports timely post-fire restoration. We believe that such restoration should be guided by the overarching goal of enhancing the ecological integrity of forest ecosystems and informed through broad participation of the public, particularly local communities. Such an approach yields benefits not only for forests and rural communities but also helps to restore the standing of our public land management agencies and the forestry profession.

With regard to the HR 4200, our comments fall into three categories:

1. The goal of post-disturbance intervention should be to restore ecosystem integrity rather than simply to recover economic value.
2. The proposed legislation should include strong protection measures to ensure that salvage logging and post-fire restoration operations occur in appropriate locations and do not harm forests and aquatic ecosystems and soil and water resources.
3. Strong requirements for collaboration are needed whenever expedited review procedures are utilized.

Restore Ecosystem Integrity

The Forest Guild believes that salvage logging and other post-fire treatments can play an important role in restoring ecosystem integrity when such projects are properly located and where appropriate ecological safeguards are in place. Our goal should not be to harvest every dead or dying tree before it loses its economic value. Decision making should instead be driven by clear direction from the Congress that the overriding purpose of post-disturbance treatments is ecosystem restoration.

In the words of HR 4200, the key question is to determine the “areas where management intervention would be helpful.” We should not assume up front that every burned acre needs intensive salvage logging and rehabilitation. Disturbance tends to occur in a non-uniform pattern resulting in different levels of impact. Wildfires, for example, typically burn across the landscape with different severities. The Forest Guild believes that post fire salvage logging and rehabilitation is appropriate in areas that experience high severity fires that are out of the range of natural variability. In these cases, intervention by managers can help restore ecosystem integrity much faster than if the forest is allowed to heal on its own.

But some forests, such as higher elevation lodgepole pine forests, are adapted to high severity, stand replacing fires. In these forest types, intensive salvage logging and rehabilitation is not necessarily appropriate.

These illustrations demonstrate that there is not a one-size-fits-all solution for post-disturbance management. In our experience, success comes down to having a highly trained and experienced forester on the ground, integrating information from various disciplines and from a wide range of stakeholders. There is no substitute for local knowledge and experience when making decisions about how to best treat forests after disturbance.

HR 4200 would be strengthened if the goal of ecosystem restoration was included as the overriding purpose of this legislation. In addition, the Bill should require that Catastrophic Event Recovery Evaluations and Landscape Assessments consider opportunities to restore more than just tree cover including reduction of fuels in burned and unburned areas, decommissioning of roads, and stabilization of streams.

Protect Sensitive Resource Values

Any forestry intervention holds the potential to do both harm and good. Our members subscribe to principles that hold that a forester’s first duty is to the forest and its future and that harvesting operations should minimize the impact of harvest operations on sensitive resources values such as water quality, soil, and wildlife habitat. In practice, our members operate according to proven practices and with safeguards or ecological sideboards that ensure that these values are protected.

These sideboards include:

- Only salvage visibly dead and dying trees;
- Preserve legacy trees;
- Keep salvage operations off of steep slopes and highly erosive soils, and out of stream corridors; and
- Use existing road systems for access and avoid roadless areas.

The Bill would be strengthened by adding all of these sideboards to Section 104(d) related to pre-approved management practices. In addition, we are concerned that the language in Section 104(d)(2)(B) related to the removal of trees “regarding which mortality is highly probably within five years after the end of the catastrophic event.” In our view, the wording in this section is overly subjective and could lead to the harvest of green trees that might survive the event and would be important biological legacies for the regenerating forest. We recommend that the Bill include clear and practical direction for field foresters to objectively determine the likelihood of mortality during the five year period.

Encourage Effective Collaboration

The Forest Guild agrees that the current process for stimulating action for post disturbance restoration does not work. It is laden with too much paperwork, too much uncertainty, and sometimes results in outcomes that are harmful to long-term forest recovery. But expedited review and decision making processes are only part of the solution. On their own, such processes can inflame tensions and perpetuate the distrust that currently exists between land managers and some stakeholders.

In our experience, we have found that progress towards responsible forest management and trust building among all stakeholders occurs best when collaborative processes are in place and lead by members of the community rather than by federal agency personnel. Experience with implementation of Healthy Forests Restoration Act has shown that collaboration facilitated by federal agencies often takes on the characteristics of the business-as-usual public involvement process and fails to resolve difficult issues.

In contrast collaboration led by non-agency parties, such as local officials or community-based organizations in the case of Community Wildfire Protection Plans, leads to solutions with broad support. The key for Section 102(g) is to make clear that the Secretaries are responsible for ensuring that: 1) catastrophic event recovery evaluations and catastrophic event recovery proposals are developed through a collaborative process; 2) all parties have the opportunity to participate; 3) leadership of the collaborative process is not necessarily assigned to a federal agency; and 4) that the collaborative process must generate results within the timeframes specified in the legislation.

In closing, the Forest Guild appreciates this opportunity to testify and to explain the rationale used by our members in developing salvage timber harvest projects that protect

ecosystem integrity and provide a return to landowners. We hope that the experience of our organization provides a practical contribution to the development of this legislation.

FOR MORE INFORMATION:

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