

RESTORING FOREST HEALTH

THE BOONE AND CROCKETT CLUB IS LEADING POLICY EFFORTS TO IMPLEMENT ACTIVE FOREST MANAGEMENT PROJECTS

As this story was going to print, more than 8.5 million acres had already burned this fire season, well above the 10-year average since 2010. It's very likely that by the time the 2020 fire season comes to an end, it will rival the 2015 and 2017 seasons that each exceeded 10 million acres, the most in the nearly 40 years since consistent wildland fire statistics have been compiled. Across the West, Americans are suffering tragic loss of life and property. Even communities far removed from the fires have been affected by unhealthy air quality, and new research suggests exposure to smoke could worsen COVID-19 symptoms and even increase the mortality rate.



Wildfires are nothing new, in fact it was the Great Fire of 1910 that brought attention to the potential for catastrophic wildfire leading to decades of fire suppression. However, development within the wildland-urban interface has since increased and is exacerbated by dense forest stands, the rapid spread of highly flammable invasive vegetation, and warmer, drier weather. Mother Nature is a harsh manager of these landscapes, especially in their current conditions. The resulting high-intensity wildfires cause total forest stand replacement, altering the soil chemistry and structure, changing hydrological systems, releasing tons of carbon and toxic pollutants, all while destroying wildlife habitat. These impacts are long-term and can permanently alter the forest.

Fortunately, we have the science and experience to return these ecosystems to a more balanced state. We know that active forest management such as harvesting trees, thinning dead and dying trees, creating fuel breaks, prescribed and managed burns, and creating defensible spaces are all effective tools at our disposal. The United States Forest Service (Forest Service) and its partners are implementing active forest management projects that reduce the risk of catastrophic wildfires. These projects improve the health of our forests and support jobs, but

they also improve wildlife habitat by increasing forage production and creating more dynamic, resilient landscapes. Along with greater consideration of social-ecological systems, warmer, drier weather and projected landscape conditions, active forest management is a critical piece of a comprehensive approach to mitigate the risk of catastrophic wildfire.

The Boone and Crockett Club has a long history with wildland forest management. In the early 1900s, we worked to develop and pass legislation that created the National Forest System and the U.S. Forest Service to manage these forests. More recently, we worked with Congress to give the federal government new tools and direction to address the situation, helping pass legislation in 2003 expediting thinning in the wildland-urban interface, in 2010 and 2014 creating Good Neighbor Authority to administer forest health projects, and in 2018 protecting the budget of the Forest Service against the rising costs of fighting wildfires.

Once again, we are actively engaging in the policy discussions centered on improving the health of forests that are stressed by lack of management and a changing climate. Following is information the Club recently developed for a conservation policy factsheet on forest health.

FEDERAL FOREST HEALTH RESTORING AMERICA'S LARGEST NATURAL CLIMATE SOLUTION

BOONE AND CROCKETT CLUB CONSERVATION POLICY FAC SHEET

The National Forest System covers 193 million acres in 43 States. The National Forest System was created to provide recreation and timber to benefit the whole country, including the rural communities near the national forests. They also provide important wildlife habitat and protect watersheds and our drinking water supplies. These forests are suffering from widespread forest health problems due to climate change and a lack of active management. Active management can improve wildlife habitat, reduce the risk of large-scale wildfires, improve carbon sequestration, and create jobs. Federal forests offset 11 percent of the nation's carbon emissions and could do even more with the proper management.

Forest health has deteriorated significantly. Over 80 million acres of Forest Service lands are at elevated risk of catastrophic wildfires, insect, or disease outbreaks. In California alone, 66 million trees are dying or already dead. Large-scale wildfires—like the 2020 fires in California, Oregon, Washington, Wyoming, and Colorado—destroy homes and disrupt families, cause human and wildlife deaths, and cost American taxpayers billions of dollars annually to suppress. In other national forests, such as those in the Lake states and Appalachians, passive management has reduced the desired acreage of certain forest habitats, especially young forests

inhabited by upland birds, deer and elk, reducing opportunities for sportsmen, and harming already precarious rural economies and license sales to wildlife agencies.

There is a nationwide housing shortage that can be met using domestically produced lumber. With limited exceptions, timber harvested from the national forests must be processed into lumber in domestic sawmills. Housing starts have lagged behind replacement numbers for almost a decade and a half. The rapid increase in housing starts in 2020 among other factors has spiked demand for lumber, leading to record breaking lumber prices. Active management of our national forests can put significantly more timber on the market to help create jobs and meet housing demand, all while sequestering carbon in long-lasting wood structures.

Timber harvests from national forests are well below forest-plan levels. Timber harvests from our national forests are less than half the amount called for in current forest plans. These reductions have devastated rural communities where sawmills and paper mills provided some of the only stable, year-round employment. In the far West, more than 56,000 timber industry jobs have been lost, with tens of thousands of additional indirect jobs lost. The wood-using industry has all but disappeared from large

sections of the interior West. Employers with thousands of jobs supporting countless families in other regions hang in the balance.

Bureaucratic analysis eats up over \$350 million annually. Due to conflicting laws, regulations, and decades of judicial decisions, the Forest Service spends more time and money pushing paper than they do managing forests. Small projects too often require thousands of pages of analysis.

Litigation stalls restoration work. Even after lengthy collaboration and agreement among nonprofit organizations, tribes and stakeholders, litigation by activist groups often prevents the Forest Service and communities from thinning forests to reduce wildfire risk in many states. In Oregon, for example, activists sued to stop a thinning project on 11,000 acres in the Mt. Hood National Forest, which was rejected by the district court judge but reversed by the 9th Circuit. The 9th Circuit injunction stopped the "Crystal Clear Restoration Project" before any thinning could occur, despite four years of environmental analysis by the Forest Service. The project was designed to reduce wildfires, especially catastrophic crown fires, improve habitat for owls and other wildlife, and protect communities and streams. Instead, the White River Fire burned the entire project area this August and September.





WHAT IS TO BE DONE?

Understand the context on our national forests. Active forest management on national forests is primarily intended to create specific types of wildlife habitat, or to reduce the danger of uncharacteristic wildfires that damage watersheds and threaten communities. Current forest plans call for considerably more active management than is currently occurring. These projects can help reduce the risk of catastrophic wildfires by harvesting trees, thinning dead and dying trees, and removing ladder fuels. These projects improve the health of our forests and support jobs, but they also improve wildlife habitat by increasing forage and creating more dynamic, resilient landscapes.

Use Great American Outdoors Act (GAOA) funding. GAOA provides mandatory funding to the Forest Service and the Bureau of Land Management to enhance access for management, firefighting, and recreational use. This critical

source of mandatory funding can help create rural jobs. The focus should be on repairing failing roads that are impairing water quality, providing access for wildland firefighters, and improving access for hunters and anglers.

Focus on job creation in rural areas while improving habitat. Focusing on improving forest conditions and wildlife habitat can increase timber outputs, while creating wildlife habitat and sequestering more carbon, and reducing unwanted carbon emissions from wildfire. The Boone and Crockett Club has supported bipartisan reforms to support active management, including legislation enacted in 2003 expediting thinning in the wildland-urban interface, in 2010 protecting the budget of the Forest Service against the rising costs of fighting wildfires, and in 2014 and 2018 creating good neighbor and shared stewardship authority to administer forest health projects. Full use of these authorities will help create rural jobs and improve wildlife habitat.

Start replanting forests and accelerate large-scale restoration projects. There are over 3.4 million acres of Forest Service land requiring reforestation in California alone. Across the National Forest System, over three quarters of acres in need of reforestation were deforested by wildfires. The future of these forests requires intensive replanting efforts to restore healthy, growing trees, and ensure current and future jobs. Extensive pre-commercial thinning is also required on the national forests, potentially creating even more jobs. Restoration projects need to be offered at scale and more quickly.

POLICY PRIORITIES FOR FOREST MANAGEMENT

The Boone and Crockett Club's policy team in Washington, D.C., is working hard to secure legislative actions that will help improve forest management. Recent written testimony submitted to the House Agriculture Subcommittee on Conservation and Forestry outlined the immediate

ABOVE: Prescribed fire in the Odin treatment unit on the Deschutes National Forest. **BELOW:** The Odin treatment unit on the Deschutes National Forest prior to treatment (left) and after mastication treatment (right).



response required to begin restoring these forests so they can once again sequester carbon and begin to reestablish wildlife habitat and future timber supplies. They also outlined steps to make it easier to manage acres on national forests that are not in restricted land uses such as wilderness and inventoried roadless areas. A summary of their primary recommendations is below.

IMMEDIATE RESPONSE:
Focus on restoring access for forest management, prioritizing reforestation, converting National Environmental Policy Act ready projects to salvage.

Congress should immediately authorize the Forest Service and Bureau of Land Management to conduct roadside hazard tree removal out to 200 feet on either side of roads impacted by wildfires in the last two years. Existing administrative authorities for such removal are limited, and if experience is any guide, in many areas, the Forest Service will opt to close roads indefinitely unless they receive relief from administrative review and adequate funding to complete this task.

Second, while there will be some salvage opportunities, the priority must be on reforestation. In many places, salvage logging can help take some of the standing dead trees off the landscape. Using these trees for lumber will lock up carbon in long-lasting wood products while creating better growing conditions for

the next stand of trees, which will sequester more carbon. The Forest Service should be able to remove hazard trees and take aggressive steps toward reforestation on non-reserved (i.e.—not wilderness or inventoried roadless areas) acres without further environmental review. The Forest Service should consider using aerial seeding techniques on high-cost, steep slope acres to keep costs down.

Third, the 2020 fires damaged millions of board feet of timber under contract, and tens of thousands of acres that had recently been through National Environmental Policy Act (NEPA) review in preparation for fuels reduction work. While some of the volume under contract will have lost all remaining value, Congress can direct the Forest Service and the Bureau of Land Management to rapidly survey burned areas, prioritize completion of supplemental information reports, and provide a finding that active timber sales under contract are deemed to still meet the purpose and need of the project level for

NEPA. These projects should be converted to salvage sales within 60 days. All such sales should be allowed to proceed under the Healthy Forest Restoration Act's judicial review provisions.

GOING FORWARD:
We need to manage unreserved forests like their future—and ours—depends on it.

Americans should be proud of the conservation legacy they have created by setting up the federal land management agencies and establishing protected areas like wildernesses. However, the simple fact is that when the Forest Service tries to manage unreserved federal lands, activist groups have abused a series of well-meaning laws to delay or stop needed management. As these forests mature after a century of fire suppression and decades of passive management, the slow pace of management the Forest Service has been able to achieve is simply slower than the fires we are experiencing.

Congress has, over the last 17 years, provided the Forest Service with some tools which can help them put forest management projects on slightly faster tracks. The Healthy Forest Restoration Act was first passed in 2003 and has been amended several times, including in the 2014 and 2018 Farm Bills. The Forest Service has a number of legislated categorical exclusions, designation by prescription authority, Good Neighbor Authority, and some other tools to expedite the NEPA process. While we've seen an uptick in management and a slow increase in timber harvests in the last 12 years, we still see Forest Service staff shy away from managing what should be unreserved acres because of concerns that harvest will disrupt wildlife habitat. Instead of managing unreserved lands, we see small projects which leave many overstocked acres untouched, and even these go forward only after a laborious process that often involves administrative objection and litigation. ■

A photo of the Odin treatment unit after the Rosland Road Fire shows how active forest management can reduce fire severity. The left side of this road is untreated, while the right side was treated three years ago. The crown fire spotted from the left side into the treated area, dropped from the canopy and decreased in intensity.

