

# Clinton Plan Sacrifices Pacific Northwest Ancient Forest Ecosystems

by Jim Britell & Tim Hermach

[Ed. Note: The following comments on the Clinton Forest Plan—"Option 9"—were sent to Robert Jacobs, Interagency SEIS Team Leader (the "team" was composed of representatives from the Forest Service, the Bureau of Land Management, US Fish & Wildlife Service, and university scientists), by Jim Britell, Conservation Chair of the Kalmiopsis Audubon Society, PO Box 1349, Port Orford, OR 97465, and Tim Hermach, Director, Native Forest Council, PO Box 2171, Eugene, OR 97402. The Clinton plan to log extensive portions of the remaining shreds of Ancient Forests on public lands (while failing to provide permanent protection for any of these lands) has successfully divided the environmental groups of the Pacific Northwest. Britell and Hermach have led the resistance to Option 9 and are currently suing the Clinton Administration to block its implementation. While these comments may appear quite technical because they refer to the "Report of the Forest Ecosystem Management Assessment Team" (FEMAT Report), they shed valuable light on the plight of the ancient forests of the Pacific Northwest, and, are instructive for forest defenders throughout North America.]

"Making plans is often the preoccupation of an opulent and boastful mind, which thus obtains the reputation of a creative genius by demanding what it cannot itself supply, by censuring what it cannot improve, and by proposing what it knows not where to find."  
(Immanuel Kant)

## General Observations on the Plan

If one disregards Option 9, the Report of the Forest Ecosystem Management Assessment Team (FEMAT Report) itself is an excellent case for no more logging on federal lands. For a number of years the Native Forest Council has advocated the abolition of logging on public lands, a position usually referred to as the "zero cut" Option. While we have presented a number of economic arguments to support our position, we have never fully documented the ecological argument for this position. The FEMAT Report, while not disclosing the ecological effects on all species of a "no cut" alternative, does provide enough information to strongly suggest that our alternative may be the best approach to complying with existing National Environmental Protection Act (NEPA) and National Forest Management Act (NFMA) requirements regarding species protection on public lands. We surmise this is true because, although the species viability ratings were not disclosed for this alternative, it is clear that the less logging and the more reserve, the higher the species viability ratings.

If one regresses the data in the Draft Supplemental Impact Statement (DSEIS), implied alternatives appear to the left of Option 1, which we would like developed. Reserve size increases and harvest level decreases as one moves down numerically though the

alternatives—and the species viability increases. If one assumed that the reserve could increase to greater than the sum of federal lands by including private lands and that the harvest could become a minus number by buying back sales and restricting private land logging, then at some reserve size and harvest level we could, at least theoretically, provide for 95% species viability of some greatly increased number of species. We see no reason why these potential alternatives could not be displayed. Moreover, we believe it is a clear requirement of present law to truly disclose a "no change" or "no action" alternative, and that the DSEIS is flawed by its absence.

The following chart shows a regression of the data to determine what Late Successional reserve size might insure a well distributed viability for all the 1100+ species analyzed in the FEMAT Report. A reserve of approximately 13 million acres might provide well distributed populations for all species. This would require all the matrix land in Option 1 to be added to the reserve in Option 1, and an additional 1.5 million acres of other (State or private) land to also be added.

## Problems With The Plan

The Clinton Forest Plan is a wickedly political "attractive nuisance". While ostensibly a pre-decisional document in the form of a Draft Supplemental Environmental Impact Statement (DSEIS)<sup>1</sup>, the document actually presents as "science" a decision made months ago that much of the remaining Ancient Forest, roadless areas, and species in the Pacific Northwest must be sacrificed. To package this decision as sound ecological

science it presents data in a way that underestimates the amount of Ancient Forest that will be placed at risk and the benefits of creating reserves, but overestimates the benefits of logging. It arrays data so that it cannot be compared with previous reports, and assumes the success of major projects neither funded nor designed. The process records and meeting minutes are sealed or nonexistent, and the methodology received inadequate peer review. The Plan's technical and legal construction is so weak and species protection so poor it probably wouldn't survive a legal challenge.

Option 9, the preferred Option, trades protection of 60% of the remaining multi-canopy Ancient Forest for clear cutting the other 40%.<sup>2</sup> If implemented, it will rely on the logging of Ancient Forests for over half the timber volumes projected in the Plan into the indefinite future. The Plan tries to present the continued liquidation of the forests in the Pacific Northwest in the best possible light; nevertheless, the impact of the Plan's annual 1.2+ billion board feet of logging is painfully obvious. Logging abuses on the Northwest's forests are of such magnitude that even the Option 1, which according to the document itself is most restrictive of logging (scientists call this "the big green alternative"), is inadequate to preserve the viability of many species within the forests.

The effects of the preferred alternative are not fully described because the location and magnitude of logging depends on future studies and processes not yet designed. Specifically, the amount and effects of thinning and salvage, and of the roads that will be built are not disclosed. Much of the logging will be done after watershed analysis,

but this is an untried process and the methodology was not disclosed—the chapter on this being merely an encyclopedia of practices, not required procedures.

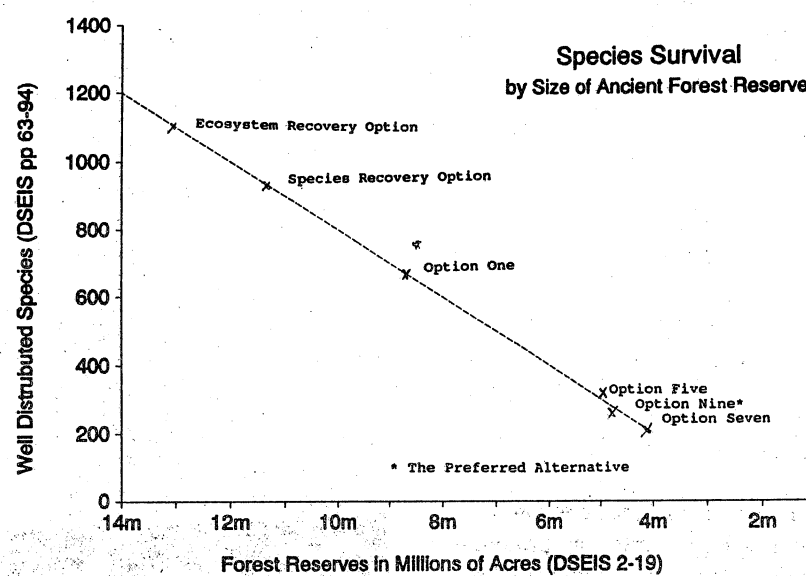
The DSEIS<sup>3</sup> states that watersheds will recover under Option 9. But some scientists believe that most, if not all watersheds, are on a downward path and that when normal rainfall resumes, roads and denuded slopes will fail. The Elk River watershed analysis, claimed as a model for watershed restoration, is in fact a highly controversial failure, which many believe was merely justification for logging a fairly intact watershed. A draft watershed restoration guidance document (a companion to the FEMAT Report) is now out for comment and will be published by 11/15/93. It should be obtained by anyone with an interest in watersheds.

The historical pattern of forest planning clearly shows that successive administrations attempt to establish a predetermined level of logging on public land, and then apply endangered species protection to whatever habitat remains; rather than adhere to clear legal mandates by setting aside land for the survival of species and then scheduling any logging on what land is left. This practice is continued in the Clinton Forest Plan. This administration, and the scientific and environmental communities, must face the fact that billions of board feet more of timber cannot be cut in the Pacific Northwest National Forests unless a number of environmental laws are repealed.

Despite 1800 pages we still have no answer to the basic question that should have been asked: what is the maximum amount of species protection that is yet possible on federal lands? The conclusion the data suggests is not even mentioned in the report: except thinning for restoration and fire prevention, further logging of National Forests in the Pacific Northwest should probably be ended; restrictions on private land logging imposed; and timber sales sold but not yet cut repurchased.

As a practical matter, this report may be consigned to the dumpster by a current timber industry lawsuit. The briefs and affidavits filed in that suit allege widespread illegal administrative procedures by the DSEIS and FEMAT teams. Lawyers familiar with the suit say the timber industry case is strong.

The fast track this DSEIS is on guarantees that the public comment period is a sham. A report of a meeting of Forest Service supervisors on 9/1/93 says that the Final SEIS will be filed with the EPA on 11/19/93. How can the team possibly assimilate and weigh the comments that arrive during the legal comment period when the schedule it follows requires that final decisions are made before the comment period ends on 10/28/93? The response of the interagency DSEIS team to phone calls asking that the comment period, which began 7/28/93, be extended because so many people received their DSEIS late or not at all was that the final Record Of Decision must be ready for Judge Dwyer by 12/31/93. It is just one of the plan's many ironies that the interagency DSEIS team feels compelled to bend and break NEPA rules to get the document to Judge Dwyer; yet the reason



\*Species survival is highly correlated with reserve size, (FEMAT II-29.  $R^2 = .98$ ) and inversely correlated with volume of logging.

\*Options One, Five, Seven, and Nine are detailed in FEMAT.

\*The "Species Recovery Option" would combine no logging on public lands with an aggressive restoration program.

\*The "Ecosystem Recovery Option" would expand on the Species Recovery Option by extending protective reserves and changes in management to some private lands. Approximately 1.5 million acres of private land need to be placed in reserves.

Yearly probable sale quantities (logging volume) on public lands are:

Option Seven	1.8 bbft
Option Five	1.0
Option Nine	1.2
Option One	0.2
Species Option	0.0

\*The Ecosystem Option would entail "negative" public land logging, through repurchase of sold but uncut sales, and purchases of private lands.

Chart Courtesy of David Bayles



they must go before the Judge is because the agencies were found guilty of a consistent pattern of NEPA and NFMA violations.

The whole issue of adherence to NEPA involves the question of species viability, yet DSEIS reviewers have no access to process records or minutes of deliberations, and so cannot know the identity of species viability raters. Since the scientists individual species ratings are not given, only averages of panels are provided, reviewers do not know the ranges of viability ratings for individual species. Displaying averages leads to some very misleading and overconfident predictions. For example, we are told that the 80% viability rating for spotted owls was an average of four scientists' opinions. One of the raters was an industry scientist who ranked Option 9's ability to protect Northern Spotted Owls at 100%. Two other scientists gave estimates of only 60%. So 80% is just an average of widely divergent numbers. If the divergence in ratings is widespread, this would indicate that the model and methodology are probably flawed and should not be considered as accurate.

No credible peer review of the document was done. One scientist said that the FEMAT research methodology was too poor to be published in a scientific journal. Usually in a scientific process the results and methodology are sent to an independent scientific body or journal who then chooses the scientists who will do the peer review. While the authors can suggest the peer reviewers, they don't actually select them. FEMAT's authors selected the peer reviewers, gave them little or no time to comment, and won't release their comments. This is not a new phenomenon.

The Forest Service and BLM have historically refused to subject the models, methodology and conclusion of their scientific studies to bona fide peer review. It is unlikely the scientific community will ever formally object to this since logging, directly or indirectly, funds much of the "research and science" at state, federal and university level.<sup>4</sup>

While the many process violations of this report are disturbing, it is the substance that is truly appalling. One thing that jumps out of the report is the several thousand viability ratings that show Option 1 protects every species better than Option 9,<sup>5</sup> but, when the writers rank all the Options together, miraculously, Option 9 does better than Option 1 in terms of the entire ecosystem. How can this be? Is Option 9 a neutron bomb that destroys species without harming the ecosystem?

The key to understanding this plan is to tease out the underlying drivers behind the viability ratings that implicitly or explicitly treat Option 9's high logging levels as a plus for the ecosystem and Option 1's inviolate reserves as bad for the ecosystem. (Option 1 produces the lowest timber volume available for continued cutting and the largest reserves. It is similar to Option 14C in the Gang of Four report, but with better stream buffers.)

One alleged plus for Option 9 was to posit that the forest is so damaged silvicultural restoration is necessary to restore its function. Since the biggest reserves are in Option 1, and they are assumed to be closed to "restoration", this means that even thinning plantations to protect against fire is not possible in Option 1. On the other hand, Option 9 allows "restoration" activities

in reserves.

Another imagined plus, available only in Option 9, is Adaptive Management Areas (AMA's). Now, although AMA's might strike activists as merely turning forests over to the same locals that caused the problems in the first place; the scientists who did the ratings assumed they could somehow trade reduced protection on federal lands in AMA's for increased protections on adjacent private lands. Clearly, Adaptive Management Areas represent the triumph of hope over experience. The Applegate Project, which served as a model for this idea, is still in its honeymoon stage, and hasn't proved anything except that injunctions make the industry sit down and talk. A better model would have been any of the unsuccessful experiments like the Illinois River Basin or the Shasta Costa Roadless Area, or any of the several other community planning efforts that have come to impasse and failure. The sham public participation in this DSEIS/FEMAT process is probably a harbinger of what can be expected in the AMA public participation process.

Another assumed plus for Option 9 is the assumption that long term ecosystem health is contingent on forest ecologist's logging experiments! They appear to have credited in advance the knowledge scientists expect to gain about ecosystems from AMA's and incorporated this dubious rationale into the ratings.<sup>6</sup> In numerous places in the plan they admit they have very little knowledge about old growth ecosystems and it will be a long time before they acquire it. How many trees will be left standing by the time they acquire this knowledge?

Finally, the ratings assumed that large amounts of money would be forthcoming for restoration and AMA's, and that these experiments would succeed. These speculations were then used to offset the problems Option 9's high logging levels might cause. From a process point of view the report should clearly explain the effect that future funding assumptions had on the ratings. If expected ecosystem funding is delayed or reduced, the numbers in the report will be wrong. Also, if the "experiments" fail the numbers will be off. Viability ratings should not be fluffed up by assuming funding not yet allocated, studies not yet designed, and oversight by agencies not yet reformed.

Further problems include the disturbing reports that Option 1 reserves were deliberately and sloppily drawn to increase the amount of old growth available for logging. Also, Option 9's rankings and ratings were allegedly done at different times and by different people than the other Options.

Once they had claimed such enormous real or imagined benefits for thinning in preserves, silvicultural restoration and AMA's, the proper, logical, and legal action for the scientists who drafted Option 9 would have been to create a new alternative for comparative purposes. That alternative should have presented how various species would fare if all logging of National Forest was stopped, except to convert plantations and fire suppressed stands back to their natural uneven aged condition.

This other alternative could have displayed the effects of no logging at all in National Forests. This would have

been a more appropriate, not to mention legal, way to satisfy the NEPA requirement that a "no action" alternative be considered in writing EIS's. As it is, the "no action" alternative in the DSEIS (Option 7) assumes implementing existing Forest Plans. This is an oxymoron if there ever was one since the report's analysis shows that Option 7 is devastating for species and doesn't meet NFMA, or NEPA. How could this constitute the alternative that shows the decision maker what the results of "no action" would be?

## A Distressing Development

The FEMAT team leaders have said repeatedly that all species cannot be saved. What hats do they wear when they say this: scientist? politician? acting chief of the Forest Service? What assumptions lie behind this? A dangerous threshold is crossed when key scientists, with scant political experience, decide it is politically impossible or too expensive, to save species. These are decisions for politicians and the public to make. Scientists owe it to their fellow citizens to at least lay out an alternative that shows what is possible on public and private lands, especially since the FEMAT report<sup>7</sup> displays public opinion polls showing that the American public and the citizens of the Pacific Northwest clearly want strong protection for federal forests. The issue is not whether all species can be saved or that some species depend on private land over which the Forest Service has no control: the issue is how much protection can be found for species that depend on federal land.

Confusion has arisen about how many species are evaluated in the DSEIS, and how they fare under Options 1 and 9. Some have said that 1000 species were rated and 100 were put at risk from Option 9. Actually, many thousands of species were rated and Option 9 creates problems for many hundreds of them. Confusion arises because, in the long lists of species, some individual entries are really groups of species. For example, Lichens: table IV-18 rates only 16 Lichens, but these represent 125 different species. Fungi: table IV-17 rates 48 Fungi, but this represents almost 600 individual species. An overall assessment of the Clinton Plan's effect on species needs to be done.

We can tell from even a cursory review that there is no question that Option 9 is much worse for all Ancient Forest dependent species than Option 1. For example, 46 species of Lichens, which show over a 50% chance of surviving in a well distributed fashion under Option 1, have less than a 50% chance under Option 9. 62 species of Fungi have a better than 50% average of surviving well distributed under Option 1, but less than 50% under Option 9. 71 species of Mollusks drop from better than 50% under Option 1, to less than 50% under Option 9. And we are not talking about marginal changes. These Mollusk ratings are typically about 70% under Option 1 versus about 30% under Option 9. Not only these species that scientists call "low lifes" are affected, most fish ratings drop from 80% under Option 1 to 65% under Option 9. So the specific question is not whether we can save all species, but why can't we try to save the ones we still have?



Olympic National Forest. Photo by Elizabeth Feryl



The answer appears to be that the Forest Service views forests as merely an agricultural commodity, the extraction of which is hindered by inconvenient rules on endangered species. The Forest Service receives the bulk of its money for administering programs, everything from restoring fish runs to training staff, from cutting trees—they know it and so does everyone else. Some may assert that there's much we don't know about these forests and that if scientists can't do logging experiments the ecosystem is put at mortal risk, but we now know enough to know that deforestation is bad for many species. The real threat to our forests is that our leading scientists still refuse to say so.

## How Did The Clinton Forest Plan Go Off Track?

The problems with this DSEIS began at the forest summit when historian Kimbark MacColl was asked by the White House to tone down his prepared opening remarks because they were too critical of the timber industry. If the summit had been a real hearing that followed the rules of evidence, the anguished and heartbreaking testimony about mill closures would have been followed by cross examination. We would have learned the real reasons the mills closed; e.g. that the mill in Arcata was replaced by one in Chile.

That Dillard, Oregon, where the heartbreaking pictures of a displaced timber family were taken, is a town dominated by Roseburg Forest Products, a company that exports wood chips to Japan.

That Pacific Lumber and Shipping, whose representative Mr. Spence was very impassioned about the need to resume federal log sales in the Gifford Pinchot National Forest where his company is a major buyer, is a major exporter of timber.

The Mayor of Hoquiam, Washington said the largest mill in her town closed because of injunctions over federal timber, but a Washington State government report concluded that: "lack of investment in new equipment was the prime cause of the closure."

If we allow the issue of timber "harvest" to devolve from science to essentially a welfare issue, to be decided on the basis of human need, then we need to apply the standards of proof and evidence that any welfare office would apply. We would not allow a welfare claim on the basis of photographs and anecdotes, but that is exactly what the Clinton Plan does.

Many activists hoped that the unraveling of the forest ecosystem created by the collusion of the timber industry, federal land managers and local politicians would finally be exposed at the summit for the whole country to see. Alas, it was not. Of course, sometimes it's best in public policy debates to accept the fact that mistakes were made and go forward without assessing guilt. But this is practicable only when the parties have genuinely agreed on a new path. From observing the timber industry public relations during and after the conference it's hard to see where they admit they have made mistakes. And if the Forest Service has changed their approach to forest management since Clinton's election, it certainly has not been visible on



Gifford Pinchot National Forest. Photo by Elizabeth Feryl

the ground. This is not surprising because the current process holds thousands of timber and Forest Service families hostage to timber cutting. As a local ranger recently said to her staff, "If you want to keep your jobs you better start making stumps".

The new administration is willing to acknowledge that the forest problem is about more than just spotted owls, but is no more willing to publicly surface the underlying issues than its predecessors. They repeat the same old canards: "Maybe people did some bad things in the past, but we have to go forward." "Guilt is everywhere and nowhere." "Preservationist and devastationists arguments are equally valid." "Both sides are equally guilty of extreme demands." Except of course, large employers like Weyerhaeuser who are senior members at the table are to be treated with utmost respect.

## Other Issues

One of the less examined aspects of the Clinton Forest Plan is a program of economic development to ease the transition of rural communities impacted by the so called "timber crisis". The intent is to fast track the awarding of hundreds of millions of dollars to rural counties and communities in the Pacific Northwest.

Rural development means condo's, docks, RV parks, dams, gas lines, water mains, paid staff for the chamber of commerce and generally increasing the population of rural areas—all projects that benefit the right wing leadership of rural areas, not unemployed timber workers. Projects envisioned as "infrastructure development" may well do more damage in the floodplains and estuaries of Northwest rivers than Forest Service clear cutting has ever done in the head waters. Even more ironic and tragic, the prime beneficiaries of these projects may well be the same individuals and companies who have profited from exporting logs from private land. Just as sending food to third world countries for starving children usually means enriching the local warlords; so too, money sent to rural areas primarily benefits the rural oligarchy. It

is ironic that a Democratic administration would develop a pork barrel program whose prime beneficiaries are its most virulent adversaries.

## Additional Points

1. Are reserves for Martens, Pileated woodpecker and other late-successional species already in the Forest Plans canceled and returned to the matrix?<sup>8</sup>

2. How much of the volume of 1.2 billion comes from Ancient Forest in the short term and long term?<sup>9</sup>

3. Who paneled which Options, especially Option 9? When and how did they do it? Were the ratings changed? Many tables imply a level of accuracy that simply does not reside in the data.

4. The legal basis of this Plan needs to be analyzed, especially the possibility that the ratings in Option 9 were artificially inflated by assumptions of unrealistic future funding.

5. Are the Option 1 reserves drawn to include more non-ancient forest and cut over areas than one would expect, thus artificially reducing the land base and the volume available in this Option? Further, the agencies are now in the process of "revising" the reserve boundaries so maps included with the DSEIS are not final.

6. The FEMAT Report<sup>10</sup> takes shots at scientists who advocate policy. Since this report is essentially a political document, not a scientific one, this is the pot calling the kettle black.

7. Because of the internal logic of the Plan, and the way thinning is credited as a big "benefit", advocating changes in these Options is very complicated. If Option 1's reserves could be entered for thinning, its viability ratings would increase. If Option 9 was only "improved" by making its preserves inviolate, its ecosystem viability ratings would fall. If all the changes were made to Option 9 that some activists suggest, the result would be to convert Option 9 to Option 1.

8. The Clinton Plan increases agency discretion about where and how to log, despite a long track record of abuse of any discretion that has ever

been granted.

9. The Plan avoids preserve protection in favor of complex procedural prescriptions that require careful monitoring, despite clear evidence that the agencies are institutionally incapable of monitoring themselves.

10. The volume mills claim they need to avoid shutdown can be found on the Pacific Northwest export docks, where the equivalent of 9 billion board feet of logs, chips and pulp is exported yearly.

11. The Clinton Forest Plan is not science. It is a template for the destruction of most of the Pacific Northwest's remaining native forests - and will demoralize forest activists around the world.

## A Final Note

The political process must reflect balance, as must a person or an ecosystem, but that does not mean that every part of the system must itself be in balance or take a balanced position. It is the overall system that must have balance. If you wish to balance a teeter-totter and a big fat person is sitting at one end, you will not create balance if you sit in the middle. You must sit far out at the other end. Powerful forces want it all, and are getting it.

## Footnotes

<sup>1</sup> The DSEIS includes the Forest Ecosystem Management: An Ecological, Economic, and Social Assessment; the Report of the Forest Ecosystem Management Assessment Team (FEMAT Report). Option 9 of the DSEIS is the preferred alternative.

<sup>2</sup> The DSEIS classifies as late successional forest trees 21 inches and up. The amount of multi-story late successional forest is shown in table IV-10 as 4.5 million acres, and the report says that 20% of this is in the matrix (open for logging). But what activists think of as Ancient Forest - 36" dbh and larger multi-story canopy—constitutes only 2.5 million acres. The real question is what percent of that is in the matrix? Data currently being compiled will probably show 30-40% of the true Ancient Forest in the matrix. Another reason for the 20-40% discrepancy is that the grids used to calculate the amount of late successional forest were 40 acres in size and thus may have overlooked smaller stands and left them in the matrix. In any case, the estimates in the DSEIS are clearly labeled "error prone", and "non-field verified". At this point, the 10 year old debate about what data base to use in calculating the amount of Ancient Forest, where it is, and how to define it is still unresolved. Until mutually agreed upon numbers are developed, the best estimate is that from 20-40% of the remaining Ancient Forest is at risk under this plan.

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\*Researcher Note: The Clinton Forest Summit was a step on the path of the Northwest Forest Plan, aka (NWFP), or Clinton Forest Plan (CFP) and associated studies and reports with their formal and informal names and abbreviations e.g. Forest Ecosystem Assessment Team (FEMAT), Interagency Scientific Committee, Option 9, Scientific Assessment Team (SAT), "God Squad", Zero Cut and "gang of four". The lead scientist for these studies and the head of the FS throughout was Jack Ward Thomas aka J.W. Thomas) who unraveled all these in 2003 at <http://www.fs.fed.us/r5/nwfp/plans/sus.shtml>. Other articles of mine on this are at: 05/93, 10/93, 1/94, 4/94, 1/99,

## Clinton Plan

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<sup>3</sup> DSEIS Chs. 3&4, Pgs 48,49

<sup>4</sup> The FEMAT Report was prepared under the supervision of Jack Ward Thomas [Ed Note: Recently Dr. Thomas was appointed as the new Chief of the US Forest Service] and Jerry Franklin, two scientists whose pioneering work is largely responsible for there being any Ancient Forest left to fight about. We owe them a lot. While they displayed the 10 Options, they did not select the preferred Option. Neither has publicly endorsed Option 9. Since the deliberations of this team are sealed, it is not possible to know how the team could have such good people and such a bad result.

<sup>5</sup> These viability ratings express in percents the likelihood for survival of over one thousand species under the 10 DSEIS Options. For example, the Silver Haired bat has a 53% likelihood of surviving across its range under Option 9 and 98% under Option 1. Some species are so dependent on private land or so rare that apparently nothing land managers do with federal lands alone can save them now.

<sup>6</sup> DSEIS Chs. 3&4, pg. 40-46

<sup>7</sup> FEMAT Report ch. VII, pgs 29-31

<sup>8</sup> FEMAT Report ch.III, pg.23

<sup>9</sup> FEMAT Report ch.VI, pg.9

<sup>10</sup> FEMAT Report ch.VII, pg. 112



*Olympic National Forest, Hood Canal Ranger District. Photo by Elizabeth Feryl*