

**Responses to USFS R6 Listening Session Questions on National Forest Plan Revisions
Submitted by Paul W. Adams, Chair, Policy and Legislation Committee
Oregon Society of American Foresters (OSAF)
May 18, 2015**

The OSAF has nearly 1,000 members and is the largest state affiliate of the national Society of American Foresters (SAF). *The SAF supports and represents the forestry profession in advancing the science, education, technology, and practice of forestry.* OSAF members work throughout the state in a variety of organizations, including local, state and federal agencies, higher education, as well as the private sector. *However, in offering public comments and views on forestry issues, the SAF and OSAF focus on a professional perspective that is independent of its members' individual employers or clients.*

The comments here are presented as responses to the 3 major questions posed at the Listening Session held in Corvallis, OR on April 27. It is assumed that very similar questions were asked at the other Listening sessions, and thus these responses are not specific to the Siuslaw and instead reflect a statewide perspective. A bullet response format has been used for brevity.

It is important to note that the OSAF has not taken a formal poll or position regarding these responses to the questions posed. However, these responses follow significant discussion and feedback from OSAF leaders and interested members, and are intended to provide a professional perspective that is expected to be consistent with the general views of the broader membership. Many of these views also are discussed further in a number of relevant OSAF position statements that are listed at the end.

I. What would you like the Forest Service to consider in revising forest plans in the Northwest?

- As a basic and essential foundation, the USFS should clearly acknowledge the primary purposes and management and planning approaches for R6 National Forests that were established under federal law. These include the Organic Act (timber and water supplies), the Multiple Use Sustained Yield Act (adding recreation, fish, wildlife and sustainability), and the National Forest Management Act (adding planning and monitoring).
- As an initial step to inform plan development, the USFS should conduct a thorough and objective analysis (i.e., including non-USFS) of the implementation and economic, social and environmental results of the current NW Forest Plan, with a focus on conformance with the laws above and in meeting the stated goals and objectives of the Plan.
- Similarly, the USFS should conduct a detailed analysis of how appeals and litigation have impacted the implementation and outcomes of the current NW Forest Plan. This analysis should support the development of specific strategies, characteristics and components of the revised plans that will promote timely and effective implementation and the desired management outcomes.
- In recognition of the foundation laws above as well as contemporary sustainability concepts, the revised plans and management alternatives should include focused attention on and specific outcomes for economic and social goals and objectives. The latter should include strong rural community viability/health and agency-community/neighbor relationships. Each action alternative should include specific costs and benefits to local communities as well as staffing needs and costs of implementation.
- The revised plans should acknowledge the high site productivity of many R6 National Forests and the role of these lands in national timber supplies. The plans should recognize forest products as exceptionally "green resources," i.e., they are highly renewable, recyclable, biodegradable, and energy- and carbon-friendly. The USFS should conduct detailed analyses of local, regional and global environmental trade-offs and unintended consequences of limited timber production from R6 National Forests.

- The revised plans should acknowledge the direct compatibility, utility and value of active forest management in meeting most goals and objectives for amenity resources and ecosystem services, including high water quality and mature forest conditions and habitat. The plans should recognize that overly prescriptive and inflexible “protection” measures that greatly limit management options are unscientific and often ineffective in dealing with dynamic ecosystems and the uncertainties of climate change and other influences. Even “interim” restrictions have proven to be a significant, long-term (e.g., 2 decades) obstacle to effective management actions. The plans should emphasize and target specific resource goals and objectives, but allow flexibility in implementation with the most effective tools and techniques identified by knowledgeable and experienced local resource professionals.
- In recognition of the uncertainties of climate change and other future needs and influences, the revised plans should emphasize management for resilient forests over a “restoration” goal for R6 Forests. Similarly, provisions and plans for management flexibility and adaptability should be incorporated, such as the inevitable needs for timely and effective management responses following major wildfires. The latter influences are now highly problematic given the fixed land allocations of the NW Forest Plan, whereby a Late-Successional Reserve area must remain as such even when its primary defining characteristics are rendered no longer recognizable or ecologically functional.
- Given that forest ecological functions and habitat diversity are inherently dynamic over space and time, the revised plans should allow forest management to be similarly dynamic, with actions that shift vegetation conditions, stages and diversity around the landscape. Thus, the revised plans should not permanently fix desired successional/habitat features in specific locations; instead, these features should be carefully assigned target percentage ranges of the forest land base. Forest resource managers would then be given the flexibility to create and shift these features around the landscape in response to changing conditions and environmental influences, including neighboring lands.

2. How should the Forest Service incorporate and apply science in plan revision?

- First, the USFS should clearly acknowledge that, due to the wide array of site-specific conditions and extended lifespan of forests, effective resource management requires both technical knowledge and local professional experience. Science provides a foundation for technical understanding but it has limitations in its direct, on-the-ground application in forest resource management decisions. Thus, the plan revisions should be science-informed but not science-driven, and a more appropriate approach would be to balance and integrate “the best applicable science and experience.”
- Similarly, it should be acknowledged that the current body of R6 science publications is heavily weighted towards ecological research and includes a relatively limited amount of applied research that is essential for effective resource management planning and decisions. There also has been a notable lack of attention to economic and social science research specifically related to active forest management and associated ecosystem services, which further impacts the integration of contemporary sustainability concepts that balance environmental and socioeconomic considerations.
- The USFS should recognize that peer-reviewed and other science considered in the plan revisions can still have flaws and other limitations, which should be addressed with additional protocols and standards for reviewing and applying science. The latter should include analysis of documents and other input for statements of facts, unknowns/uncertainties, hearsay and values. The latter category also has been recognized as a key component of “normative science,” which appears/sounds objective but is revealed as values-based through terminology such as “degraded condition” or in a stated “need for restoration.”

- The USFS should take care to avoid technical/experiential bias and “micromanagement” by narrow and unrepresentative science panels or teams, agency or otherwise. The input of scientists who do not have direct and substantial experience in on-the-ground resource management can have some serious limitations when directed to the real-world context of forest management planning.

3. How should the public be engaged in the process?

- Inexplicably, in its first step to engage the public (i.e., hosting the Listening Sessions), the Forest Service has completely overlooked the many people who were either unable or unwilling to attend the Sessions. Even the R6 website devoted to the Plan Revision and the schedule of Listening Sessions does not offer any obvious means “to listen” to those who do not attend the Sessions.
- To avoid unrealistic expectations among the public, it is important to routinely highlight and clarify all of the major laws that direct what the Forest Service must and must not do. This would begin with the foundation laws (specifically the Organic and Multiple Use Sustained Yield Acts) that mandate both timber production and diverse multiple uses, as well as laws that further address environmental values. Without this context, the public responses to Question 1 above can quickly stray towards what is impossible to achieve given existing legal mandates.
- As a tool to improve general public understanding about R6 National Forests, the USFS should consider a contemporary, regional version of Gifford Pinchot’s 1907 “The Use of the National Forests,” which describes for local residents the origins of the Forests and their purpose, uses and management, in a very clear and direct style.
- Although it is important to listen to those who attend public meetings or otherwise submit comments, it is also necessary to consider the wider context and needs of the many other citizens in our local communities, region and nation. For example, the Oregon Forest Resources Institute has sponsored public surveys and focus groups that provide relevant findings about broad concerns for public forest management. Similarly, the analyses and input of groups such as the Oregon Board of Forestry’s Federal Forest Subcommittee should be carefully considered.
- The “invited public” and “stakeholders” should explicitly include forestry and other natural resource professionals independent of their employers’ interests. This can be readily achieved by establishing and maintaining direct relationships with professional societies/associations, particularly those with explicit and mandatory codes of ethics that help ensure the credibility of their input.

Finally, the Oregon SAF has several formal position statements that relate to and support a number of the responses above. These position statements were adopted by the OSAF Executive Committee and they have the strong endorsement of the broader membership, as confirmed by formal voting results.

The positions are available at <http://www.forestry.org/oregon/policy/position/> and include:

- Active Management to Achieve and Maintain Healthy Forests
- Commercial Harvest on Public Lands in Oregon
- Managing Mature & Old-Growth Forests
- Managing Riparian Forests
- Clearcutting

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