

Open Letter from Scientists in Support of the Northwest Forest Plan and Protections on Federal Lands

September 24, 2013

Senator Ron Wyden, Chair
Senate Energy and Natural Resources Committee
221 Dirksen Senate Office Building
Washington, D.C. 20510

Dear Senator Wyden:

As scientists with backgrounds in natural resource management and ecology, we wish to express our full support for the Northwest Forest Plan (NWFP). The protective provisions of the Late-Successional Reserve (LSR) network and Aquatic Conservation Strategy (ACS) are fundamental to the plan's objectives, and recent science confirms that these designations along with other elements of the NWFP are not only working, they remain at least as vital today as they were originally conceived by the plan's architects.¹ An unintended benefit of the NWFP has been a net increase in carbon stored on federal lands,² which is consistent with President Barack Obama's Climate Action Plan regarding the need for federal agencies to do more to "manage our public lands and natural systems to store more carbon."³

We are writing about attempts to increase logging on federal lands that would undermine the integrity of the NWFP, placing irreplaceable public values such as clean water, threatened fish and wildlife, carbon storage, and mature forests at risk. Our concerns include attempts to greatly increase logging on the Bureau of Land Management lands in western Oregon, specifically 2.1 million acres of the so-called O&C (Oregon and California) and Coos Bay Wagon Road (CBWR) revested lands. Attempts to weaken the protective provisions of the NWFP or ACS on these or other federal lands in order to increase timber volume may reverse improvements in water quality from important

¹Courtney, S.P., J.A. Blakesley, R.E. Bigley, M.L. Cody, J.P. Dumbacher et al. 2004. Scientific evaluation of the status of the northern spotted owl. Sustainable Ecosystems Institute, Portland, Oregon. Lint, J. 2005. Population status and trends. Pages 7-19 in J. Lint, technical coordinator. Northwest Forest Plan: the first 10 years (1994-2003): status and trends of northern spotted owl populations and habitat. U.S. Forest Service General Technical Report PNW-GTR-648, Pacific Northwest Research Station, Portland, Oregon. DellaSala, D. A., and J. Williams. 2006. Northwest Forest Plan Ten Years Later – how far have we come and where are we going. *Cons Bio* 20:274-276.

²Krankina, O.N., M.E. Harmon, F. Schneckenger, and C.A. Sierra. 2012. Carbon balance on federal forest lands of western Oregon and Washington: the impact of the Northwest Forest Plan. *For Ecol & Manage* 286:171-182. Turner, D.P., W.D. Ritts, Z. Yang, R.E. Kennedy et al. 2011. Decadal trends in net ecosystem production and net ecosystem carbon balance for a regional socioecological system. *For Ecol & Manage* 262:1318-1325.

³The President's Climate Action Plan. Executive Office of the President. June 2013.

restorative actions taking place under the ACS.⁴ We are also concerned that congressional proposals to designate a portion of BLM O&C lands as a state “timber trust” managed under Oregon’s forest practices rules would set a dangerous precedent of moving away from multiple-use and public involvement by effectively privatizing public lands. This would pose serious water quality problems if these lands are subject to increased logging, road building, pesticide and herbicide application, and other actions under Oregon’s relatively poor forest practices rules.

BLM lands in western Oregon play a vital role in the integrity of the NWFP as they contain over 1.5 million acres of mature and old-growth forests; Key Watersheds for salmon, including federally listed coho and other imperiled aquatic species; critical habitat for spotted owls and marbled murrelets, including the only feasible mature forest land-bridge between the Oregon Coast Range and Cascades; and low-elevation and intact forests that may function as potential climate refugia.⁵ Older forests in this region are among the most carbon dense ecosystems in the world;⁶ logging them would release global warming pollution. Recent studies also have shown that BLM O&C and CBWR lands provide clean drinking water to over 1.5 million Oregonians.⁷ Thus, maintaining the protective provisions of the NWFP and critical habitat of federally listed species, along with federal statutes such as the National Environmental Policy Act, Clean Water Act, and Endangered Species Act (among other federal statutes) are essential to the integrity of these lands and their ability to provide for a myriad of ecosystem services.

Finally, proposals to increase logging in spotted owl habitat, under the assumption that active management is needed, remain untested hypotheses as the science is far from settled. Numerous studies have documented impacts of thinning to spotted owl prey, and thinning could exacerbate barred owl invasions in spotted owl territories.⁸ Other forms of logging such as “variable retention regeneration harvests,” as proposed under the name “ecological forestry,” would fragment already heavily logged landscapes, introducing predators into marbled murrelet nest sites.⁹ Such concerns were repeatedly raised by professional societies such as The Wildlife Society, American Ornithologists’ Union, and Society for Conservation Biology in peer review of active management provisions¹⁰ in

⁴Reeves, G.H., J.E. Williams, K.M. Burnett, and K. Gallo. 2006. The aquatic conservation strategy of the Northwest Forest Plan. *Cons Bio* 20:319-329.

⁵DellaSala, D.A., N. Staus, and E. Fernandez. 2005. Importance of western Oregon BLM lands and reserves to fish and wildlife conservation. Unpublished Report. Geos Institute, Ashland, OR. Staus, N.L., J. R. Stritholt, and D. A. DellaSala. 2010. Evaluating areas of high conservation value in western Oregon with a decision-support model. *Cons Bio* 24: 711–720. Olson et al. *ibid.* The Nature Conservancy (TNC) and Wild Salmon Center. 2012. Atlas of conservation values on Bureau of Land Management holdings in western Oregon. <http://oe.oregonexplorer.info/ExternalContent/TNC>

⁶Smithwick, E.A.H., M.E. Harmon, S. M. Remillard, S.A. Acker, and J.F. Franklin. 2002. Potential upper bounds of carbon stores in forests of the Pacific Northwest. *Ecol Applic* 12: 1303-1317.

⁷<http://www.geosinstitute.org/images/stories/pdfs/Publications/FederalLandsManagement/BLMOCvaluesJune2013opt.pdf>

⁸DellaSala, D.A., R.G., Anthony, M. Bond, E. Fernandez, C. Frissell, C. Hanson, and R. Spivak. In press. Alternative views of a restoration framework for federal forests in the Pacific Northwest. *J. Forestry*

⁹ DellaSala et al. in press, *ibid.*

¹⁰ www.fws.gov/oregonfwo/Species/Data/NorthernSpottedOwl/CriticalHabitat/default.asp

the recovery plan and critical habitat determination of the spotted owl, yet these controversial measures are now referenced in Senator Wyden's O&C framework.

We urge you to carefully consider the science and concerns expressed by these societies and the signatories of this letter in your deliberations. At a minimum, upholding the NWFP and protecting remaining mature forests on public lands is essential to the ecosystem management and biodiversity conservation standards set forth under the NWFP. Clean water, vibrant salmon populations, and recreation are linchpins of Oregon's economy, treasured by Americans, and best developed in the region's mature and old-growth forests. Therefore, protecting these irreplaceable public assets is a prudent investment in Oregon's future.

Sincerely,

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