Most Timber Sales on the GMUG NF Both Cause Ecological Damage and Are Subsidized by Taxpayer Dollars

In Contrast, Lower Elevation Ponderosa Pine Forest Restoration Treatments Can Protect Homes, Provide Quality Jobs, and Create Wood Fiber

Prepared for the Grand Junction Daily Sentinel
Jeff Berman, Executive Director, Colorado Wild
March 19, 2004

Taxpayer Subsidies for the Forest Service's Timber Program

Numerous accounts document subsidies for the Forest Service timber program nationally. For instance, Taxpayers for Common Sense published a report in July 2002 concluding that "Taxpayers have provided more than $116 million in direct subsidies to the timber industry for construction of logging roads at a cost of nearly $15,000 per mile", and "The Forest Service has been unable to provide data on the cost of its timber sale program since FY 1998. At that time, the agency reported a $126 million loss. An independent analysis found losses to be three times that amount."[1] Other estimates of the subsidy are much greater. In April, 1999, the Congressional Research Service, the nonpartisan federal agency which serves as the research branch of Congress, concurred with an advocacy groups' report, concluding that "$1.2 billion is a reasonable estimate of the net cash loss from the Forest Service's FY1997 timber program to taxpayers."[2]

The General Accounting Office, U.S. Department of Agriculture Office of Inspector General (OIG), members of Congress, and others have repeatedly documented Forest Service failures to properly account for expenditures, track assets worth billions of dollars, or reconcile account balances with the U.S. Treasury on a regular basis.[3] Over the last decade, the Forest Service has failed eight out of ten Inspector General audits.[4] Following Congressional scrutiny over timber program losses, the Forest Service instituted the Timber Sale Program Information Reporting System (TSPIRS) in the 1980's. Despite accounting methods that hid actual costs of road building, reforestation, and other expenditures in order to make the timber program look cost effective, TSPIRS still reported huge taxpayer subsidies.[5] Subsequently, the Forest Service eliminated the accounting system in 1998. The last TSPIRS report in 1998 reported that the agency lost $126 million.

---

[1] TCS, "Lost in the Forest: How the Forest Service's Misdirection, Mismanagement, and Mischief Squanders Your Tax Dollars", pg. 1.
[2] John Muir Project, "Ending Timber Sales on National Forests: The Facts (Spring 1999)."
[3] TCS, pg. 11.
[4] Id. A review of Forest Service financial management reports from the U.S. Department of Agriculture Office of the Inspector General. For more information, see http://www.usda.gov/oig.
[5] See http://www.fs.fed.us/forestmanagement/reports/tspirs/index.shtml.

For Colorado forests, the TSPIRS 1998 report concluded that the Present Value of Benefits (Receipts) was $1,463,000, while costs were $1,406,000, for a total benefit of $57,000.[6] Given the concerns raised above with cost accounting methods, coupled with the almost break even income/cost on the GMUG NF, it is likely that the GMUG NF actually lost money on its timber sales program.

Accurately assessing the economics of any single national forest timber sale program today, much less any single timber sale, is difficult if not impossible to do. TSPIRS didn't assess individual sales, only the timber sale program for each national forest overall. While revenue from a national forest's timber sales can be calculated from cut and sold reports or individually reviewing the awarded bids, the cost side of the equation is much more problematic given numerous assumptions about the level of overhead necessary (building rent or mortgage, equipment, staff time, etc.) and what costs (or percent of costs) should be included (road building for roads that remain open, mitigation measures, county receipts, etc.)

Case example: Eighty percent of the ***Missionary Ridge timber sale*** would be accessed via the Missionary Ridge road. Reconstruction of the road was entirely financed through the Burned Area Emergency Rehabilitation (BAER) account – separate from timber sale program account and not accounted for in the Environmental Impact Statement's cost/benefit analysis. Even so, the first timber sale bidding package required a $13,494 minimum bid, yet disclosed an $83,790 road reconstruction cost.[7] This fails to include administrative costs of preparing the timber sale, much less Forest Service overhead.

Case example: The Forest Service acknowledges that both the ***Hayman and Burn Canyon postfire salvage timber sales*** are below cost. For instance, Burn Canyon's selected alternative 2 for instance has a Present Net Value of -$1,557,469.[8] While most of the cost is for replanting, the intent is to restock the area for future commercial logging as quickly as possible.[9]

Timber Sales Most Likely Cause Ecological Harm, and Ultimately, the Forest Service Simply Doesn't Know What the Impacts Are to Wildlife

Every timber sale on the GMUG NF includes as one of its purpose and needs to improve forest health, either through reduction of insects and disease, or to reduce fuels, the latter ostensibly to reduce high intensity fires. Outside of lower elevation ponderosa pine forests and mixed pine forests, these purposes are wholly unsupportable. Harvesting in spruce-fir can increase both the risk of insect infestation and fire. Blowdown in both harvested and adjacent stands is often associated with cutting in this timber type. The

[6] 1998 TSPIRS Report, App. B, pg. 112. 1997 data is unavailable on the website (404 Not Found error). 1996 shows a similarly small income/cost ratio as 1998 ($86,000).
[7] Coon Creek Timber Sale Bid Package, Jan. 8, 2004 (Coon Creek is the first of five timber sales to be offered under the Missionary Ridge EIS.)
[8] Burn Canyon Environmental Assessment, pg. 102. PNV is defined as the "measure of the difference between discounted revenues and discounted costs".
[9] Ibid, pg. 103.

material left from logging slash and potential blowdown can create conditions favorable to spruce beetle infestation as well as fuels loading.[10]

Dr. Tom Veblen's twenty years of research for instance clearly show that the forest fires of the last few summers, and the supposedly out of control insect epidemics killing trees throughout the west, are quite normal and to be expected.[11] In the midst of a 100 or 200 year drought – we can expect fires that on average only occur every 100-200 years. Dr. Veblen and many other researchers' findings of Front Range forests for instance show that the only forest type "out of whack" are lower elevation ponderosa pine forests. Lodgepole, spruce-fir, aspen, mixed conifer, and even upper elevation ponderosa forests are well within what's called their historic range of variability, or HRV. In other words, these forest types, in relation to fire risks, have not been significantly affected by human activities, most notably logging and fire suppression. Efforts to insect- of fire-proof such forests that have natural experience insect infestations or burned with intense fires for millennium, are a futile waste of taxpayer dollars.

As with the fiscal side of the timber sale program, the Forest Service frequently doesn't understand logging's impacts on the environment, especially to wildlife. For two decades, the Forest Service has utilized a shortcut to ensure, in lay terms, that various uses of the national forest aren't driving species towards the endangered species list. This shortcut entails gathering population data for just a few species, and determining whether the trend is up, neutral, or going down (i.e. driving a species towards extinction). Known as Management Indicator Species, or MIS, the Forest Service is then supposed to extrapolate the results of the analysis of these few species to ensure the survival of all native and desired non-native vertebrate species. In many cases, the Forest Service has been negligent in adhering to even this shortcut of ensuring the health of the few MIS.

Case Example: In November 2002, the GMUG NF proposed the ***Goat Creek aspen timber sale*** for the north face of Lone Cone Mountain in Norwood's watershed. Even though the water quality report contained numerous disclaimers as to its inadequacy (for instance that "[t]he study has not been rigorous enough nor of sufficient duration to pass the test of scientific review…", the report amazingly concluded, and the Environmental Assessment only cited, that "The Forest Service study and investigation on likely organic carbon sources has been adequate for determination on whether or not timber harvesting will contribute to the degradation of domestic water supplies." Without intervention by Colorado Wild and the San Miguel County Commission, the GMUG NF would have approved this timber sale. The project is now on hold until more adequate water quality studies are performed.

Case Example: The ***GMUG NF MIS Assessment***[12] addresses only 12 of their 17 MIS. Population and trend for the missing five are never considered. Meanwhile, the document plainly acknowledges that, for most of the other twelve, the GMUG NF simply

[10] Personal communication, Barry Rhea, Forest Service consultant with a Masters Degree in Forest Management and Silviculture, March 18, 2004.
[11] See http://www.colorado.edu/geography/news_events/facilities/biolab/biolab.html. Specifically, see
[12] http://www.fs.fed.us/r2/gmug/policy/mis_assessment/index.shtml

doesn't have any data, nor have they tried to gather it. For instance, the American Marten is used as the MIS for spruce-fir timber sale activity because of its "special habitat needs (coarse woody debris, closed over-stories, and interior older growth) in spruce-fir forests". The American Marten section simply states that there is little to no information available on the population status and trend of American marten, nor have protocols been adopted by the GMUG NF to survey for this species[13]. As just one other example, the Lewis Woodpecker (according to the GMUG NF representing all species associated with "mature mountain shrub" habitat[14]) section simply states that "Population numbers and trends for the Lewis' woodpecker on the GMUG do not exist." Without data to confirm habitat models used to determine the efficacy of those models, there is no way to ensure that populations aren't being harmed.

Case Example: The ***Red Creek timber sale*** would log all around clearcuts that have failed to regenerate in 30-50 years since they were logged. See attached aerial photograph. Similar situations exist on the Alpine Plateau where the GMUG NF has proposed another high altitude spruce-fir timber sale (Longdraw).

Case Example: ***Missionary Ridge*** and the whole San Juan National Forest. A federal judge granted Colorado Wild a preliminary injunction as the Forest had no population data for six MIS, including those supposed to assess the impacts of logging on burned forest. The overwhelming scientific consensus - greatly summarized in the Beschta report[15] - authored by eight scientists specializing in resource impacts from post-fire salvage logging and endorsed by 50 others - is that post-fire logging will only worsen the risk of landslides, flooding, and erosion bringing even more water quality impacts. Yet the San Juan National Forest nonetheless approved logging in known high erosion hazard areas and significant road construction – the single greatest factor contributing to increased erosion, all within the watershed for three municipalities. Reconstructing dozens of miles of roads, constructing three more miles from scratch, and logging areas now re-vegetated, much at tremendous taxpayer expense, is the epitome of irresponsible and unsustainable logging.

---

[13] Interestingly, the Rocky Mountain Region of the Forest Service has asopted protocols, available through Zielinski, William J., and Thomas E. Kucera. American Marten, Fisher, Lynx, and Wolverine: Survey Methods for Their Detection. USDA Forest Service, pacific Southwest Research Station, General technical Report PSW-GTR-157, August 1995.)

[14] According to B. Rhea however, Lewis' woodpecker is an indicator of open pine habitats with shrubby understories and riparian cottonwood below 8,000 feet in elevation, and not an indicator of montane shrub: Tobalske, B.W. 1997. Lewis' woodpecker *Melanerpes lewis*: *In:* The birds of North America, No. 284 (A. Poole and F. Gill, editors). The Academy of Natural Sciences, Philadelphia, Pennsylvania, and The American Ornithologists' Union, Washington, D.C. Thus the GMUG NF has failed to correctly represent impact on species of certain habitat types.

[15] Betscha, Robert L.; C. A. Frissell; R. Gresswell; R. Hauer; J. R. Karr; G. W. Minshall; D. A. Perry; and J. J. Rhodes, 1995. Wildfire and Salvage Logging: Recommendations for Ecologically Sound Post- Fire Salvage Logging and Other Post-Fire Treatments on Federal Lands in the West. Corvallis, OR: Oregon State University.

Conclusion

Managing Colorado's national forests for major commercial timber production doesn't make sense. Colorado's trees simply aren't very big, don't have much value compared to those in timber-growing regions of the United States (like the southeast and northwest), and thus usually result in below cost timber sales. We have a short growing season (four months or less especially at higher elevations), compared to 9 months or more in Georgia and Oregon. Access is difficult across rugged terrain and thus costly. We don't have large acreages of the most desirable species (like Douglas-fir, plentiful in the northwest), and wood can be produced much sooner (30-50 year rotations) in the southeast and northwest versus 100-200 years in Colorado. For spruce-fir, the time it takes to grow trees to the legally-mandated size before cutting (i. e., the peak of growth has been reached) would be at the upper end of this range or even beyond it.

If we are going to subsidize Forest Service activities with taxpayer funds, including fuels reduction projects, we ought to be spending taxpayer dollars where it will do the most good, i. e., we should be spending our dollars in the most effective, efficient ways possible to protect homes and returning the forests to a more natural fire regime. The Forest Service's foremost home ignition researcher – Jack Cohen – unequivocally describes that homes ignite either through direct and consistent contact with flames, or from firebrands flying from a distance.[16] His conclusions: Ignitions from flames occur over relatively short distances (tens of yards, not hundreds of yards). Modeling concludes 100 feet or less, and actual experiments reveal no ignition beyond 33 feet. Case studies confirm 86-95% survival at 30+ ft. Defensible space work, not efforts in the backcountry, address these issues.

Logging for forest health purposes outside of lower elevation ponderosa pine is wholly unjustified by the best available research. On the other hand, forest restoration of lower elevation ponderosa pine forests can restore natural fire regimes, reduce damaging crown fires, and create jobs. Small, value-added, mobile mills can support many jobs with little or no subsidy depending on the level of brush to be removed and defensible space work to be done vs. the amount of merchantable smaller diameter ponderosa pine needing removal.

[16] See Cohen Powerpoint presentation on CD.