

Talking Points on H.R. 3715, Scenic Columbia Gorge Restoration Act of 2017

Post-Fire Salvage Logging Generally:

- Salvage logging following disturbances, such as wildfire, wind storm, and flood, is a multi-faceted topic that has many environmental, economic, and social consequences. The case for salvage may appear to many to be straight forward but, like many policy issues, it is far more complex.
- There is no evidence of an ecological benefit derived from salvage logging in the post-fire environment.¹
- Salvage is most assuredly NOT universally desirable following forest disturbances. Salvage logging is an activity that is conducted primarily to recover potential economic values.
- Salvage logging rarely contributes to ecological recovery in the disturbed area and can, in fact, be highly disruptive of natural recovery processes. This is a consequence of the negative impacts of salvage on surviving organisms and structures in disturbed areas and on vegetation that re-establishes naturally following the disturbance.
- Peer-reviewed science has established that organisms and structures that survive disturbances play critically important roles in recovery of the disturbed site following disturbance, and that salvage logging almost invariably will result in disruption of these natural recovery processes. Ultimately, salvage logging is a tax – and often a significant tax – on ecological recovery following disturbances.
- Because of the high potential for significant negative environmental impacts, decisions regarding salvage logging on federal forest lands need to be made very carefully. Decisions need to consider the long-term management objectives, including those related to native biodiversity, and be based on careful on-site evaluations of the intensity and boundaries of salvage operations. Large-scale blanket exemptions from careful environmental analysis are completely inappropriate for this kind of activity. Indeed, given the disrupted nature of the environment following the disturbance, detailed environmental analyses are even more important than they are for undisturbed forest lands.
- Post-fire salvage logging – or proposals to expedite such logging – usually includes replanting after logging, which is characterized as “creating a new forest faster than letting nature do the healing.” However, in most situations, natural regeneration is robust and artificial replanting results in the creation of highly flammable “plantations” that are likely to reburn at a higher intensity and mortality in the future.²
- Aggressive artificial reforestation can have major negative impacts on conservation of native forest biodiversity and ecological processes, which is an important goal of management on federal forest lands. While reforestation may have a high priority on private lands managed primarily for wood production, gradual re-establishment of forest canopies is generally more

appropriate on federal forest lands to allow for development of early successional ecosystems and their associated dependent biota, which includes many neotropical migrant songbirds, native ungulates (e.g., elk and deer), and butterflies (also known as “complex early seral forest habitat”).³

- Snags are one of the most important early seral habitat structures, therefore removing them significantly reduces their functions.⁴
- Salvage logging removes large woody fuels, but does not mitigate future fire hazard because it typically leaves behind the fine woody fuels that drive most fire behavior and does not significantly influence the amount of fuels produced rapidly by new vegetative growth.⁵
- Not all forested systems have missed a fire cycle or exhibit changed fire effects from historical conditions, so diverse perspectives are a requisite to well-supported management strategies.⁶ In the case of the Columbia River Gorge fires, these areas have not missed a fire cycle (200-300 year average); but when they do burn, they burn at high intensity in a mosaic pattern – this is normal fire and forest behavior.
- There will be more wildfires. Fortunately, fires are an important ecosystem process. These facts have led to the near consensus in the scientific and management community that our relationship with fire must change.⁷ As we continue to transition to the new fire management paradigm, it is imperative that these beneficial fires do not result in policies that expand short-term economic gain at the expense of long-term forest resiliency and the ecosystem services they provide.

H.R. 3715 Specifically:

- Includes an extremely expansive definition of “catastrophic event,” which is defined to include “rain storms” – in an area that annually receives up to 100 inches of rain a year. Such an expansive definition would allow for salvage logging after almost any natural disturbance of any magnitude.
- A significant portion of the Eagle Creek fire is located in the federally-designated [Mark O. Hatfield Wilderness Area](#) and therefore congressionally off-limits to active forest management of any kind.
- Requiring the Forest Service to develop a proposal for salvage logging within 30 days of the conclusion of a “catastrophic event” would supersede more important and ecologically beneficial post-fire remediation, such as BAER work (sec. 2(b)). The Forest Service should be permitted to plan and implement emergency post-fire remediation, rather than forced to plan for commercial extraction prior to stabilization of disturbed areas.
- Section 2(d) utilizes sufficiency language to side-step important environmental analysis and public engagement requirements. This section mirrors language in the infamous Salvage

Rider and Logging Without Laws Rider, which deeply divided the public and damaged the public's trust in the Forest Service.

- The Gorge is a world-renowned area that is home to innumerable ecological treasures, including municipal water supplies, threatened and endangered species and their critical habitat, a Wilderness Area, cultural resources, wetlands, and historic objects, among others: any active forest management will be highly controversial and have unique effects. Section 2(d) would mandate that a simple environmental assessment – rather than a more comprehensive environmental impact statement – would suffice to authorize logging here.
- Section 2(d)(2) allows for 10,000 acres of clear cut salvage logging within the Columbia River Gorge without detailed environmental review. This would be an unprecedented action that is unsupported by the science or public opinion.
- Section 2(e) alters long-standing Endangered Species Act consultation procedures, and exempts a covered project from consultation if the Forest Service makes a “not likely to adversely affect” determination. This process puts listed species at risk from extinction.
- Section 2(e)(2) requires that a covered project move forward without ESA coverage if the consultation process takes longer than 60 days. This unprecedented process puts listed species at risk from extinction.
- Section 2(e) ultimately authorizes project implementation in all circumstances (except for a jeopardy opinion issued less than 90 days after consultation commences) regardless of an adverse effect determination.
- Section 2(f) prohibits the issuance of an injunction halting salvage logging, even if a violation of law is found by a court of law, including an appellate court.
- Section 2(h) threatens to create flammable fiber plantations by requiring replanting at a higher stocking level than required by the National Forest Management Act.

¹ Lindenmayer, DB, Burton, PJ, Franklin, JF (2008) Salvage logging and its ecological consequences. Island Press. 246 p.

² Kemp, KB, Higuera, PE, Morgan, P (2016) Fire legacies impact conifer regeneration across environmental gradients in the U.S. northern Rockies. *Landscape Ecology*, 31(3), 619-636; Donato, D. C., J. B. Fontaine, J. L. Campbell, W. D. Robinson, J. B. Kauffman, B. E. Law. PostWildfire Logging Hinders Regeneration and Increases Fire Risk. *Sci.* 311, 352; Rother, MT, Veblen, TT. (2017) Climate drives episodic conifer establishment after fire in dry ponderosa pine forests of the Colorado Front Range, USA. *Forests*, 8:159.

³ Swanson, E. Franklin, J.F., Beschta, R.L., Crisafulli, C.M., DellaSala, D.A., Hutto, R.L., Lindenmayer, D.B., Swanson, F.J. 2010. The forgotten stage of forest succession: early-successional ecosystems on forest sites. *Front. Ecol. Environ.* 9. 117-125; Campbell, JL, Donato, DC (2014) Trait-based approaches to linking vegetation and food webs in early-sera I forests of the Pacific Northwest. *Forest Ecology and Management*, 324:172-178; Fontaine, J.B., Donato, D.C., Robinson, W.D., Law, B. E., Kaufmann, J.B. 2009. Bird communities

following high-severity fire: Response to single and repeat fires in a mixed-evergreen forest, Oregon, USA. *For. Ecol. Manage.* 257, 1496-1504.

⁴ Saab, V.A., Powell, H.D.W., Kotliar, N.B., Newlon, K.R., 2005. Variation in fire regimes of the Rocky Mountains: implications for avian communities and fire management. *Stud. Avian Biol.* 30, 76-96; Hutto, R.L. 1995. Composition of Bird Communities Following Stand-Replacement Fires in Northern Rocky Mountain (U.S.A.) Conifer Forests. *Con. Bio.* 9 (5), 1041-1058; Dunn, C.J., Bailey, J.D. 2012. Temporal dynamics and decay of coarse wood in early seral habitats of dry-mixed conifer forests in Oregon's Eastern Cascades. *For. Ecol. Manage.* 276, 71-81; Harmon, M.E., Franklin, J.F., Swanson, F.J., Sollins, P., Gregory, S.V., Lattin, J.D., Anderson, N.H., Cline, S.P., Au men, N.G., Sedell, J.R., Lienkaemper, G.W., Cromack, K., Cummins, J.R., Cummins, K.W. 1986. Ecology of Coarse Woody Debris in Temperate Ecosystems. *Adv. Ecol. Res.* 15, 133-302; Tinker, O.B., Knight, D.H. 2000. Coarse Woody Debris following Fire and Logging in Wyoming Lodgepole Pine Forests. *Ecosystems*, 3: 472-483.

⁵ Donato, D.C., Fontaine, J. B., Kauffman, J. B., Robinson, W.D., Law, B. E. 2013. Fuel mass and forest structure following stand-replacement fire and post-fire logging in a mixed-evergreen forest. *Int. J. Wildland Fire* 22, 652-666; Dunn, CJ, Bailey, JD (2015) Modeling the direct effects of salvage logging on long-term temporal fuel dynamics in dry-mixed conifer forests. *Forest Ecology and Management*, 341: 93-109.

⁶ Dunn, CJ, Bailey, JD. (2016) Tree mortality and structural change following mixed-severity fire in *Pseudotsuga* forests of Oregon's western Cascades, USA. *Forest Ecology and Management*, 365: 107-118; Reilly, MJ, Dunn, CJ, Meigs, GW, Spies, TA, Kennedy, RE, Bailey, JD, Briggs, K. (2017) Contemporary patterns of fire extent and severity in forests of the Pacific Northwest, USA (1985-2010). *Ecosphere*, 8(3).

⁷ Moritz MA, Batllori E, Bradstock RA, Gill AM, Handmer J, Hessburg PF, Leonard J, McCaffrey S, Odion DC, Schoennagel T, others (2014) Learning to coexist with wildfire. *Nature* 515(7525), 58-66; North M, Stephens S, Collins B, Agee J, Aplet G, Franklin J, Fule P (2015) Reform forest fire management. *Science* 349(6254), 1280-1281; Thompson, MJ, Dunn, CJ, Calkin, DE. (2015) Wildfires: Systemic changes required. *Science*, 350 (6263): 920; Schoennagel, T, Balch, JK, Brenkert-Smith, H, Dennison, PE, Harvey, BJ, Krawchuk, MA, Mietkiewicz, N, Morgan, P, Moritz, MA, Rasker, R, Turner, MG, Whitlock, C. (2017) Adapt to more wildfire in western North American forests as climate changes. *Proceedings of the National academy of Sciences of the United States of America*, 114 (18): 4582-4590; Ingalsbee, T (2017) Whither the paradigm shift? Large wildland fires and the wildfire paradox offer opportunities for a new paradigm of ecological fire management. *International Journal of Wildland Fire*, 26: 557-561.