

TESTIMONY OF
JACOB GROVES
REPRESENTING:
AMERICAN FOREST RESOURCE COUNCIL
ASSOCIATED OREGON LOGGERS
DOUGLAS TIMBER OPERATORS
BEFORE THE
SUBCOMMITTEE ON NATIONAL PARKS, FORESTS AND PUBLIC LAND
NATURAL RESOURCES COMMITTEE
UNITED STATES HOUSE OF REPRESENTATIVES
ON
H.R. 3513, THE COPPER SALMON WILDERNESS ACT
November 13, 2007

TESTIMONY

Good afternoon, Mr. Chairman, members of the Subcommittee, Ladies and Gentlemen. Thank you for the opportunity to discuss my perspective, experiences, and concerns with H.R. 3513, the Copper Salmon Wilderness Act. My name is Jacob Groves. I have lived, worked and fished in the Copper Salmon area all my life and most recently have walked or driven nearly every acre of the wilderness proposal. I am a lifelong resident of the area, third generation forester having grown-up in Myrtle Point, Oregon, and attended Oregon State University where I earned my Bachelors of Science in Natural Resources (Forest Ecology) and my Masters of Forestry in Forest Biology.

Currently, I'm the Western Oregon Field Forester for the American Forest Resource Council (AFRC). Today I am here representing AFRC, the Associated Oregon Loggers and the Douglas Timber Operators.

Specifically, I'm intimately aware of the Copper Salmon because I grew up in the area and have fished for steelhead and salmon in the Elk River numerous times. Make no mistake; it is an excellent fishery that I have personally enjoyed and deeply value. I also agree that there are certain areas within the wilderness proposal that contain old stands of Port Orford cedar that should remain intact. That does not, however, mean this entire area should be designated as wilderness. To highlight my testimony, each of you should have a copy of AFRC's analysis of the Copper Salmon area complete with maps, photos taken on the ground and aerial photos.

AFRC has several concerns with this bill, but the most alarming to me is that approximately 1,000 acres of this proposal was included in the Coastal Healthy Forests Environmental Assessment that the Rogue-Siskiyou National Forest recently completed. This May 2007 management decision satisfied the Forest Service's requirements under the National Forest Management Act, National Environmental Policy Act, Administrative Procedures Act and many other laws. Furthermore, there were no appeals on this project nor was a suit filed challenging the agency decision. The NEPA work has already been paid for and the Forest Service is ready to move forward with needed treatments within these stands. In addition to this acreage, we believe there are an additional 1,600 acres of

second-growth stands within the wilderness proposal in need of the same type of treatments.

It's important to note that most of the area included in the wilderness proposal is classified as "Late Successional Reserves" or "LSRs" under the 1994 Clinton Northwest Forest Plan. These areas were set aside to create future late-successional forests (generally what most folks would think of as "old growth" forests) for late-succession species, such as the Northern Spotted Owl. Forest thinning projects, like those contemplated for portions of this area, were specifically envisioned under the Plan to speed the development of these characteristics. Prior to the adoption of the Plan, the 2,600 acres I'm referring to was successfully regenerated as Douglas fir plantations with timber management envisioned in the future. Today, as some of the pictures show, there are roughly 300 trees per acre—with this kind of stocking, it is unlikely these stands will ever become viable late-successional habitat and they certainly aren't providing great habitat in their current state. Moreover, roads already exist to access these areas. It is important to remember that LSRs cannot be managed after stands reach the 80-year old age class and that clear-cutting, or other intensive types of active management are strictly prohibited in these areas.

It must also be noted that this area was analyzed for its suitability for wilderness designation during the Forest's required land management process in 1989. The NFMA/NEPA approved document concluded that the area was not suitable or worthy of

wilderness designation. The area analyzed was 9,354 acres and excluded the previously managed and roaded acres which are included in H.R. 3513.

Supporters of this bill point to the world class fishery as one of the main reasons to protect it. While I appreciate the fact that they also value the area, their efforts here seem to be misguided. Many times forest management-- whether it be thinning, road restoration, soil stabilization, in-stream habitat improvements, or other activity-- is needed to ensure high-quality fish and wildlife habitat. A wilderness designation, however, would prohibit this type of restoration and severely limit the options of land managers. This area is naturally prone to land slides—but what this highlights is the need to thin some of these managed stands. When these natural land slides do occur, would we prefer, for example, 300 small diameter trees choking a stream or 60 large, older trees delivering large woody debris to a stream? I can easily say that most, if not all fish biologists would prefer large woody debris to provide adequate stream structure. Clearly the intent of this area, as already established by the Northwest Forest Plan is to create late-successional habitat, helping to enhance habitat for both fish and wildlife. Without some active management in these areas, it will be difficult to meet these important goals.

Instead of wilderness, the appropriate approach would allow for responsible management now and in the future to ensure the area remains a world-class fishery. To be clear, I am not advocating for traditional timber management in this area even though it's been done in the past, *but* the fact of the matter is timber harvests *have* been

conducted on one-fifth of the entire proposed wilderness and it *remains* an excellent fishery. Timber management and fishery health are certainly not mutually exclusive.

To me, the 1964 Wilderness Act is very clear. Wilderness is an area “untrammeled by man”, it is “undeveloped...retaining its primeval character...without permanent improvements.” When I reviewed the aerial photos of the Copper Salmon, *every single photo had a road in it. Let me make this clear, there are zero aerial photos without roads.* This adds up to 11.8 miles of system roads, 92 culverts, an unknown amount of roads no longer identified as system roads—most of these were constructed because of old mining claims, and approximately 2,600 acres of previously harvested stands (which is 19% of the total acreage) that need continued management. To the contrary, these areas have been substantially influenced by humans. At the very least, the areas containing roads, previously harvested stands and plantations should be removed from the wilderness proposal.

Finally, the Forest Service has indicated that if this bill became law, the Agency would likely “restore” roads and remove culverts to protect water quality. It has been estimated that, due to numerous culverts and the permanent nature of the roads, it would cost the Agency roughly \$300,000 to conduct these activities under current land designations. After further review, however, AFRC believes the work could realistically cost \$400,000 to \$500,000 with costs to operate heavy equipment, such as an excavator, continuing to rise with the price of diesel fuel. In all honesty, the Forest Service would likely lack the money and resources needed to completely decommission roads and return

the area to that resembling “wilderness.” If the agency were required to conduct these activities under the “minimal tools” and non-motorized policies that accompany wilderness designations, the costs could soar to close to one million dollars. The Forest Service is already having a tough time meeting even the most basic needs; its budget has been static or declining for several years and fire suppression costs consume nearly half of the budget now and will consume more than half the budget in the near future. Knowing this, it is unrealistic to place this financial burden on the already cash-strapped Agency. It is also irresponsible to designate this area as wilderness—precluding much-needed road or forest restoration in the future—with the knowledge that this could harm the fishery in the future.

AFRC has expressed a desire to work with Congressman DeFazio to find a common-sense wilderness proposal that fits the needs of the area while ensuring that responsible management can continue to contribute to the health of both the forest and the fishery. The member companies of AFRC generate thousands of quality jobs across the region and often are among the largest private employers in rural communities. Within Congressman DeFazio’s district alone, AFRC is proud to represent nearly 20 forest products companies which operate approximately 25 manufacturing facilities that employ thousands of Oregonians. These companies are both locally and privately owned and are part of the solution for our nation’s forest health, energy independence, and domestic economic challenges.

With the Federal government managing over 60 percent of the forestland in southwest Oregon, these facilities are highly dependent on an adequate supply of timber from Federal lands to survive. The lack of supply from these forests continues to contribute to economic dislocation in the area. Just last week, the Swanson Group, a major forest products employer in the western Oregon, announced layoffs that will result in the loss of approximately 150 family-wage jobs. It is clear that we must get back to responsibly managing our Federal forests, such as the areas I have outlined above that are in need of future management.

I thank you for the opportunity to testify today. I'd be happy to answer any questions you may have.