

**Statement of James Caswell  
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**Committee on Energy and Natural Resources  
Subcommittee on Public Lands and Forests**

**Oversight Hearing**

**“Old-Growth Forest Science, Policy, and Management in the Pacific Northwest Region”  
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Thank you for the opportunity to discuss the status of old-growth forests on public lands managed by the Bureau of Land Management (BLM) in the Pacific Northwest region. As a lifelong forest manager, these issues are of particular interest and importance to me.

Approximately 69 million acres of diverse forests and woodlands are managed by the BLM throughout the western United States, including more than 3.5 million acres in the Pacific Northwest states of Oregon and Washington. The BLM’s largest forest management program is in western Oregon, and my comments will focus primarily on this program. I will also briefly address the BLM’s management of Public Domain forest resources in eastern Oregon and Washington.

**Forest Management by the BLM**

Old Growth Forests have engendered passionate debate from a wide-spectrum of interested parties. We recognize the importance of old growth forests from an ecological, social, and economic perspective. We also recognize that discussions on this issue are highly charged, due to differing opinions about appropriate management as well as divergences at a more fundamental level concerning the definition of old growth. Science has contributed to our understanding of the complexity of older forests and the ecological functions these forests provide on the landscape. The complexity found in older forests increases the resiliency of these forest systems to a variety of disturbances and helps maintain healthy and dynamic forest ecosystems that provide a variety of environmental services, including clean water, wildlife habitat, carbon sequestration, along with a variety of recreational opportunities.

While there is disagreement on when a forest reaches old-growth condition, generally scientists agree that west of the Cascade Range, old-growth Douglas-fir and western Hemlock forests contain certain structural characteristics. These characteristics consist of old large overstory trees, multiple tree canopy levels, large coarse woody debris, a lush understory shrub layer and infrequent stand replacement fire events. In contrast, the dryer eastern and southwest Oregon old-growth forests generally contain widely-spaced or small groups of large overstory trees with a more open grassy understory maintained by frequent low intensity fire.

Overlying these issues are additional factors that add to the complexity of the BLM’s management. The BLM must comply with a distinct statutory mandate, the O&C Act. The lands managed by the BLM are in a checkerboard ownership pattern, intermingled with private lands, which are generally managed for industrial timber production. Forest science informs the sustained yield management of the O&C forests. Compliance with environmental laws and policy guidance add another layer of scientific considerations. The BLM’s forest management actions are analyzed by an interdisciplinary team of specialists, including wildlife biologists, soil scientists, forest ecologists and hydrologists.

These specialists utilize the available body of science in their discipline to design, implement and monitor the BLM's forest management actions. Other environmental factors, including climate change, affect natural disturbances such as fire, insects, disease, windthrow or storm damage, which have a profound impact on the health of the forests under BLM's care.

### **O&C Lands**

The BLM's western Oregon districts manage 2.5 million acres that contain some of the most productive forest lands in the world. Of these, about 2.4 million acres are managed under the "O&C" lands designated by Congress in the "Revested Oregon and California Railroad and Reconveyed Coos Bay Wagon Road Grant Lands Act of 1937" (O&C Act). The O&C Act directs the BLM to manage the western Oregon public lands ". . . for permanent forest production, and the timber thereon shall be sold, cut, and removed in conformity with the principal of sustained yield for the purpose of providing a permanent source of timber supply, protecting watersheds, regulating stream flow, and contributing to the economic stability of local communities and industries, and providing recreational facilities . . . ." (43 U.S.C. Sec.1181a).

Consistent with this statutory mandate, the BLM recognizes that the dominant use of the O&C lands is the management of timber resources, including cutting and removal. A 1990 opinion by the 9<sup>th</sup> Circuit Court of Appeals affirmed this interpretation and recognizes that the O&C Act places limitations on BLM's discretion on managing the O&C lands. The BLM also complies with the requirements of statutes enacted subsequent to the O&C Act such as the Endangered Species Act of 1973 and the Clean Water Act of 1972. The Federal Land Policy and Management Act (FLPMA), enacted in 1976, specifically provides that if there is a conflict between the O&C Act and FLPMA relating to the management of timber resources, the O&C Act shall prevail. Neither the O&C Act nor Federal Land Policy and Management Act, however, contains specific provisions that govern the management of old-growth.

In addition to these statutes, the BLM's management of public land resources in the Pacific Northwest is guided by administrative policy. Until 1990, BLM's implementation of the O&C Act was conducted in such a way that the volume sold approached the calculated and declared allowable harvest from the available timber lands. From 1950 to 1990, the BLM averaged over one billion board feet of timber sold annually. In 1950, the standing volume on the O&C lands was greater than 50 billion board feet (BBF). Fifty years later, after selling 45 BBF, the standing volume is now 70 BBF due to better information, in-growth and rapid reforestation of harvested lands.

Since 1994, the BLM has managed the forested lands in western Oregon under the guidance of the Northwest Forest Plan (NWFP). The NWFP was adopted by the Department of the Interior and the Department of Agriculture for federal forests within the range of the northern spotted owl as an "ecosystem management plan for managing habitat for late-successional and old-growth forest related species." The NWFP has a dual purpose – to maintain the late-successional old growth ecosystem and to provide a predictable and sustainable supply of timber. The NWFP has met the first objective, but not the second objective. Since adoption, timber outputs have been at just 49 percent of the called-for harvest levels. Balancing the dictates of the O&C Act, the Endangered Species Act, and other laws with the policy in the NWFP has been a constant struggle for the BLM over the past 14 years.

BLM-managed lands comprise ten (10) percent of the NWFP's total area of 24 million acres in Oregon, Washington, and northern California. In very broad terms, the NWFP, prior withdrawals,

and Congressional designations placed approximately 80 percent of this entire area in reserves, and thus excluded them from the calculation of the allowable sale quantity (ASQ).

In 1995, the BLM's land use plans for western Oregon were amended to incorporate the policy guidance of the NWFP. The NWFP categorizes old-growth forests as 200 years and older. Age is not the only factor in management decisions regarding old-growth forests. NWFP policy requires the BLM to manage the reserved areas for the purpose of "managing habitat for late-successional and old-growth forest dependent species." Standards and guidelines, applied in association with timber harvest, require the retention of snags, live trees, down logs and woody debris, measures designed to promote diversity and protect late-successional and old-growth forests and associated species.

The BLM's existing land use plans for western Oregon respond to multiple, often competing, needs for late successional--old-growth--habitat, and for forest products. Late-successional, old-growth habitat is needed to promote a healthy forest ecosystem that will support populations of species protected under the Endangered Species Act. A predictable, sustainable supply of timber and other forest products is needed to help maintain the stability of local and regional economies and contribute valuable resources to the national economy. To meet these multiple objectives, our western Oregon land use plans provided that some mature and old-growth stands would be harvested and that younger stands would be thinned.

As a result, BLM had anticipated that approximately 3 percent of late-successional and old-growth forests (approximately 11,000 acres) outside of the reserves would be harvested during the first decade of the NWFP's implementation. That level of harvest has not occurred. Since the inception of the NWFP in 1994, 3,500 acres of old-growth has been harvested from BLM-managed lands in western Oregon; approximately 41,000 acres of in-growth have occurred. Since FY 1998, there has been very little harvest of old-growth or other late-successional forests in the Northwest. The majority of harvest during this period has come from thinning in stands less than 80 years of age.

The NWFP's policy objective of "maintain[ing] the late-successional and old-growth forest ecosystem and provid[ing] a predictable and sustainable supply of timber, recreational opportunities and other resources at the highest level possible" has been extraordinarily difficult to implement on-the-ground. For example, under the NWFP, approximately 500,000 acres of BLM-managed land are available for timber harvest. Under the NWFP, BLM's target is 203 million board feet per year of allowable sale quantity and 100 million board feet of non-sustained yield LSR thinning volume pursuant to the settlement agreement in AFRC et al. v. Clarke. Each year the BLM comes closer to achieving the target. The majority of the volume offered has come from thinning sales.

The BLM is striving to balance the environmental, economic, and social needs of these unique O&C lands. Under the proposed revisions to the existing Western Oregon land use plans, BLM-administered lands in western Oregon will be managed for a variety of outcomes including late successional habitat for listed species, riparian objectives to protect aquatic habitats and water quality, and to contribute to economic and social benefits. The proposed revisions acknowledge that not all acres can be managed to achieve all outcomes. In the preferred alternative, more than half of the land base (51 percent) would be managed for objectives other than forest products, including conservation of habitat needed for the survival and recovery of listed species. About 49 percent of the land base in the BLM's western Oregon districts would be managed for permanent forest production in conformity with the principles of sustained yield, consistent with the O&C Act. BLM management activities on these acres will also comply with all other applicable laws.

## **Public Domain Forestry**

I turn now to address the BLM's Public Domain forest program, under which the BLM manages approximately 67 million acres of diverse forests and woodlands throughout the western United States and Alaska. In eastern Oregon and Washington, the BLM's Public Domain forestry program manages about 223,000 acres of commercial forests (ponderosa pine, lodgepole pine, and Douglas-fir) and 815,000 acres of woodlands (predominantly western juniper) under the principles of multiple use and sustained yield as directed by the Federal Land Policy and Management Act (FLPMA).

Since 1993, BLM policy direction for Public Domain forestry has shifted away from commercial outputs and toward a balance of natural resource benefits to current and future generations, to "maintain and enhance the health, productivity, and biological diversity of these ecosystems." Timber harvest is used as a tool to meet a variety of objectives, where appropriate. Many Public Domain acres, however, are not suitable for commercial forest products, and therefore the BLM does not calculate an annual ASQ.

Under the BLM's Public Domain forest management policy, forests and woodlands are managed to maintain or create desired forest conditions, including those that contribute to biodiversity and wildlife habitats. Where appropriate, forests are treated to reduce hazardous fuels buildups to provide for public safety.

The Public Domain forestry program manages those areas that contain old-growth (native species that are at least 150 years old) stands where they exist in their natural range. A certain percentage of old-growth occurs in non-commercial forest types, such as the juniper woodlands of eastern Oregon. The continued health and vigor of these older trees is considered in the treatments that are designed to improve forest resiliency, reduce wildfire hazards, and support a high level of biodiversity.

Most older forest communities on BLM lands are choked with higher tree densities than in the past when periodic low-intensity fires maintained these systems. In many cases these are no longer natural self-sustaining forest communities. Active management, with thinning from below and the introduction of prescribed fire, is necessary to return these forest communities to fully functioning ecosystems.

## **Conclusion**

The BLM recognizes the importance of old growth forests from an ecological, social, and economic standpoint. Given the sensitivity and controversy over these issues, the unique characteristics of old growth forests, the importance of old growth for the health of forest ecosystems and the wildlife who live there, the statutory mandate under the O&C Act to provide for permanent forest production on a sustainable yield basis, other environmental statutes including the Endangered Species Act, and the NWFP, we are certain the dialogue on old-growth will continue.

Mr. Chairman, this concludes my prepared statement. I will be pleased to answer any questions that you or other members of the Subcommittee may have.