

## [Wild Olympics Groups Responds to Port Study](#)

### Local News

Posted by: David Haviland

Posted on : December 1, 2012 at 1:20 pm

On November 26, 2012, the Port of Port Angeles, Clallam County and City of Forks released a study titled "Analysis for the Wild Olympics Wilderness and Wild and Scenic Rivers Act of 2012: Economic Impacts and Opportunities." "Seeing this study, we are now even more confident in our assessment that the final Wild Olympics legislation will not result in any impact to timber jobs. The Port used false assumptions in an attempt to generate a job impact and even so, it's clear they that they had a tough time justifying any impact." "Seemingly designed to generate fear and uncertainty, they throw in a mill closure scenario in their study, but provide no justification for how the Wild Olympics proposal would result in such a scenario." "They have finally identified the real issue however and it's not Wild Olympics—it is funding and staff support to implement the Northwest Forest Plan. We agree that additional harvest is possible under the Northwest Forest Plan and are working with local timber communities to chart a separate path forward we can all agree on for additional harvest under the Northwest Forest Plan."

**Summary** The study is deeply flawed and its conclusions are not supportable. In summary, no jobs will be lost. Removing a very small portion of the Olympic National Forest that is available for thinning does not lead to losing any jobs, since the current rate of harvest averages only 1,350 acres annually — a very small fraction of the available timber base. Harvesting at the current rate could continue for more than 50 years with no impact to the current labor force. The report tries to give the impression that even miniscule reductions in the labor force may lead to mill closures. This is a scare tactic with no supporting data. Despite the broad nature of the title, the economic analysis is limited to the Forest Products Industry, representing less than 10% of the local economy. More importantly, the assumptions and data used to generate assessed impacts to the timber base on Olympic National Forest and beyond are incorrect. The results of this study, however, do come to the same conclusion that a October 2012 Stewardship Forestry study arrived at — that the real issue with additional restoration thinning on the Olympic National Forest is a lack of federal funding for such projects. Such projects can be implemented under the Northwest Forest Plan which is a promising area of common ground between conservationists, timber interests and local elected officials. Trying to legislate significant changes to the Northwest Forest Plan over the next decade or misrepresenting the impacts of the carefully crafted Wild Olympics proposal are not likely to achieve additional restoration thinning on the Olympic National Forest.

**Response I. The Port's Study contains inaccurate assumptions that lead to false conclusions regarding impacts to the timber base.** The inaccurate assumptions regarding timber harvest on Wild and Scenic Rivers lead to the false conclusion that 3.3 timber jobs would be lost—in fact no jobs would be lost. The inaccurate assumptions regarding timber harvest in lands proposed for Wilderness lead to the false conclusion that 2.3 timber jobs would be lost—in fact no jobs would be lost. The Port's Study failed to consider the following facts in their analysis: Timber harvest is not prohibited within designated Wild and Scenic River Corridors -- The Port's study states that "Timber harvest would be restricted in the portions of proposed wild, scenic, and recreational river corridors that overlap AMAs and young LSRs and thus have an economic impact." The study then goes on to assume that no timber harvest would occur within these

river corridors. In justifying this claim, the report cites 36 CFR 292.46, the standards and guidelines for timber harvest in the Hell&rsquo;s Canyon National Recreation Area. These do not apply to Olympic National Forest nor do they apply to designated Wild and Scenic Rivers outside that specific NRA. In fact, logging is not prohibited along *scenic* or *recreational* classified rivers (outside wilderness). As evidenced by the recent analysis for the Humptulips Thinning Project on a river managed for its Wild and Scenic values under the 1990 Olympic Forest Plan, the Olympic National Forest clearly recognizes opportunities for timber harvest within Wild and Scenic River corridors. Designated Rivers classified as *wild* are subject to Forest Service policy that restricts timber harvest but the areas proposed as a wild classification in the Wild Olympics legislation are deliberately overlaid on reaches that currently have timber restrictions as designated Wilderness, inventoried roadless areas or Late Successional reserves greater than 80 years old. The Port Study assumes that inventoried roadless areas included within the Proposed Wilderness, currently protected by administrative rule, could be opened for harvest &ndash; The 2001 Roadless Rule, which has recently been legally put to rest at the Supreme Court level after ten years of appeals, currently restricts road-based commercial timber harvest in designated inventoried roadless areas. These areas have not been, and are not, available for harvest, yet the Port Study assumes that they are relevant to the impact of the Wild Olympics legislation. The Port Study assumes that new roads would be constructed or reconstructed to access timber with in the Proposed Wilderness &ndash; The study does not limit its analysis to the existing road system which is misleading. Funding does not exist to expand the road network, and the current trend is exactly the opposite with the Olympic National Forest and other national forests which are currently working to implement the national directive to complete an Access Travel Management Plan analysis to identify a fiscally and sustainable road network by 2015. The Port Study assumes that the more than 5,000 acres of Potential Wilderness in the legislation would result in an impact to timber &ndash; Areas proposed as Potential Wilderness in the legislation differ significantly from the 126,000 acres of those areas proposed as Wilderness. Potential Wilderness areas include a 200 ft setback from roads the Olympic National Forest has identified for decommissioning including associated previously harvested stands. In fact, this separate designation was included by Congressman Dicks and Senator Murray to ensure that any road decommissioning and associated restoration thinning could have time to occur before a potential designation. These areas would only be designated as Wilderness if (1) the Olympic National Forest receives funding to do the decommissioning work on the road in question and (2) approves the decommissioning in a future NEPA decision. In many cases Potential Wilderness areas are never designated or, in the recent case of the Thunder Creek Potential Wilderness Area in Ross Lake National Recreation Area, such a designation can take 25 years. The Port Study extrapolates imaginary direct timber impacts of the Wild Olympics legislation to calamitous mill closures scenarios that are unjustified by the methods presented in the study &ndash; While the study erroneously concluded that 5.6 direct timber jobs would be lost, the authors make the incredible leap that &ldquo;any reduction in available fiber&rdquo; could lead to inter-sector closures with impacts on paper mills and bioenergy generation facilities with cascading effects leading to the loss of 431 direct jobs and up to 1172 total jobs when indirect and induced effects are included. The mill closure scenarios seem to be presented for the sole purpose of generating a large job impact number and have no bearing or relationship to the Wild Olympics proposal. The report clearly states that it does not estimate the chances of mill or paper production facilities closing and provides no data to demonstrate that any closures would result from passage of the Wild Olympics legislation. To the contrary, Nippon and Port Townsend Paper are cumulatively investing more than \$120 million in new facilities that will increase their need for wood feedstock by 250%. They would not have done that without conducting detailed market analyses of the wood that would be available for their mills.

**II. The Stewardship Forestry Study (October 2012) provided a clear and transparent focus on what impact the Wild Olympics Legislation would have on the Olympic National**

**Forest timber base** The Stewardship Forestry Report concluded less than 1 percent of the proposed 126,000-acre wilderness is harvestable under the current management policies of the Olympic National Forest. The study showed more than 99 percent of the wilderness proposed in the final legislation is already out of the timber base either because of current Forest Service administrative protections, riparian areas, distance from roads, or other factors the agency considers when conducting timber sales. The Stewardship Forestry Report identifies 190,000 acres of available timber harvest capacity exists on the Olympic National Forest that would be unaffected by the proposed designations in the Murray/Dicks legislation. The Stewardship Forestry Report illustrates that it is the rate of harvest, not available timber, that is the primary factor in determining what impacts, if any, there could be to timber supply or related jobs. Because the current rate of harvest averages only 1,350 – 1,500 acres annually, the report concludes that the Olympic National Forest could significantly accelerate its current rate of harvest, for 50 years or more. The report confirmed that the Wild and Scenic River designations proposed in the legislation will have no impact on ONF timber production. The Stewardship Forestry Report concludes that “the proposed wilderness within the Wild Olympics legislation will not limit timber supply under the current management policy framework, and thus should not result in reduced harvesting or job losses.”

**Both the Port Study and the Stewardship Forestry Study Identify Potential Areas of Common Ground** The Port Study accurately concludes that the real problem, and opportunity, for timber harvest is not modification of the Wild Olympics proposal, but expanding Forest Service funding and staff support for thinning projects within the currently available timber base (i.e. areas outside the Wild Olympics proposal). Timber harvest on the Olympic National Forest is focused on restoration thinning, not harvest of old-growth. As stated in the standards and guidelines for the Northwest Forest Plan, “Thinning (precommercial and commercial) may occur in stands up to 80 years old regardless of the origin of the stands (e.g., plantations planted after logging or stands naturally regenerated after fire or blowdown). The purpose of these silvicultural treatments is to benefit the creation and maintenance of late-successional forest conditions.” The Northwest Forest Plan set the Probable Sale Quantity (PSQ) for the Olympic National Forest at 10 million board feet (MBF) annually. However since 1994 the Forest has regularly exceeded that volume, averaging approximately 17 million board feet annually through additional habitat and watershed restoration thinning projects as directed under the guidelines listed above. With current treatments averaging 1,350 - 1,500 acres a year, we concur with the primary conclusion of the Port study that “many stands will surpass 80 years before being thinned.” The Port Study further documents the decrease in Forest Service field staff by “more than one-third of their budgets and workforce over the decade 1994-2003.” We agree with the Port’s conclusion that with increased funding and staff support, this Forest could significantly increase habitat and watershed restoration projects that would, in turn, result in significant increases in harvest volume coming off the forest within the context of the Northwest Forest Plan. All of these projects would be in areas outside of those proposed by Wild Olympics.