Suitable/Unsuitable for Timber Production

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 The terms suitable and unsuitable for timber production must be clarified in the Revised Plan and the management implications for lands classified as “unsuitable for timber production; timber harvest can occur” must be better explained. Over one million acres, almost half of the Lolo National Forest, is in this latter management category of “unsuitable but harvest can occur.” Most members of the public, and even many Agency employees, would conclude that If you are cutting/harvesting trees, putting them on a log truck, hauling them to a mill where they are processed into lumber, you are producing timber. How then can this be allowed on lands unsuitable for timber production?

In the worst case, members of the public who are opposed to most if not all forms of forest management, find in this terminology further proof that the Forest’s true motivation is to produce as much timber as possible regardless of the condition and limitations of the land. It is incumbent on the Forest to explain the reasons beyond the purely economic to harvest trees. I provide suggested language below to explain these issues in the final Forest Plan.

The requirement that lands be categorized as suitable or non-suitable is an unfortunate dichotomy enshrined in the basic regulatory language governing the forest planning efforts. Forests do not cleanly divided into two categories of suitability and non-suitability for timber production in a way that corresponds to the public’s common understanding of the concepts. And when the Proposed Action does try to provide a more detailed explanation of various categories, it provides Tables 21 and 22 which are convoluted and unintelligible to most. Simplified explanations of these and many other tables in the Proposed Action is needed.

Most basically the Forest must do a better job of differentiating timber production from timber harvest. This is more than a semantic exercise. Projects, such as the Woods Gulch fuels treatment project in the Rattlesnake NRA and projects in the Pattee Canyon Recreation Area have been mired in confusion over these terms.

I offer, for your consideration, the following text (in italics below) in the spirit of clarifying the complexity of these terms.

*What is timber production?*

*Timber production is a long process that can start with preparing a site to grow trees (possibly burning or scarifying/roughing up the soil); planting trees or seeding the area; pre-commercial thinning the stand of trees if the young trees grow in too densely; monitoring the growth rate of the trees; and at a point when the rate of tree growth is slowing down, harvesting some or all of the trees. And the process begins again on a sustainable basis intended for unlimited future generations of forest.*

*The National Forest Management Act of 1976 requires the Forest Service in its Forest Plans to identify lands that are suitable for sustained timber production based on physical characteristics such as soil type, precipitation, and slope angle, and as well as regulatory restrictions and other resource needs.*

*Not all lands with suitable growing conditions are necessarily identified as suitable for timber production. For example, timber production is prohibited in Congressionally-designated Wilderness regardless of the physical characteristics of the land. In designated Wilderness Congress has mandated that natural processes shall dominate, and timber harvest is prohibited.*

*As a second example, in high-use recreation sites, investment in the long process of timber production is not practical and would conflict with other uses of the site. Therefore, such sites are also classified as unsuitable for timber production. However, it may be necessary to remove (harvest) some hazard trees for public safety, to reduce fuels and create defensible spaces in the event of fire, etc. If commercially viable, sale of these trees is permitted. To allow this process the Forest Plan would classify these sites as “unsuitable for timber production but harvest may occur.” Timber harvest, in this recreation example, is just the cutting and removal of trees for other resource reasons and not as part of a sustainable timber production process.*

*In summary harvest* ***activity*** *can be done as part of a sustainable timber production* ***process*** *on suitable sites or this* ***activity*** *can be allowed to protect or enhance resource values on other sites. Congress, in drafting the National Forest Management, understood this distinction and the possible need to cut trees on some lands classified as unsuitable.*

*There are over a million acres of land on the Lolo National Forest classified as “unsuitable for timber production; timber harvest can occur.” These sites generally grow trees, but often not at growth rates or under conditions that qualify them as suitable for long term, sustainable timber production. Nonetheless on some of these lands there are multiple reasons for timber harvest such as fuel reduction on lands protected too long from natural fire processes, restoration of diverse habitats, or cooperation with neighboring landowners. The reasons for this activity are disclosed to the pubic during the project development process. This activity must also comply with Forest Plan direction governing timber harvest on lands unsuitable for timber production as provided by forest wide plan components in the FW-UTH section.*

In summary the Forest Plan should emphasize the importance of this extensive swath of “unsuitable” lands for maintaining sustainable ecological processes on the Forest. The Plan should provide specific plan components for managing the portion of the Forest that is classified as “unsuitable for timber production/harvest allowed” including plan components governing mechanical treatment as well as prescribed fire on these lands. There are few plan components in the Timber section regarding timber harvest on unsuitable lands. Because this classification covers almost half of the LNF, the Forest Plan should present a separate plan component section for this issue and these lands. This FW-UTH section should explain the nuances of timber production suitability and the implications for timber harvest using language such as provided above. Cross reference this language in other sections of the Plan. Even though these non-suitable lands have other overlays such as management area direction, the question of the use of tools such as timber harvest on unsuitable lands is contentious and potentially confusing. With half the forest in this management category, it is critical that the public and future generations of agency employees clearly understand the plan components, expectations, and allowances for land so classified.