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# FEATHER RIVER BULLETIN

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Wednesday, May 5, 1993

## Flap may jeopardize timber-environmentalist talks

By Dave Moller  
News Editor

Members of the seemingly polarized timber and environmental communities of Plumas County have been meeting secretly in recent weeks in effort to find some common ground for the county's future.

But those meetings may be in jeopardy because of information provided the media by Supervisor Bill Coates; information local environmentalists say is incorrect, old news and what they are afraid is

an effort to scuttle the talks.

The problem began last week when Coates gave members of the print and broadcast media a multipage document from the Sierra Club entitled "California's Ancient Forests. A Grassroots Proposal for Ancient Forest Protection in the Sierra Nevada."

That document was prefaced by a synopsis sheet which insinuated that Friends of the Plumas Wilderness members Mike and Sally Yost, of Indian Valley, wanted to tie up 51 percent of the

Plumas National Forest (PNF) as a forest reserve.

The synopsis and 51 percent tie-up figure was discussed on a Quincy radio station last week, and announcer Ralph Wittick took the Yosts to task because he thought the 51 percent figure was theirs. Wittick contended the plan would bring the county's already beleaguered timber industry to its knees.

Wittick said he used a "poor choice of words" when he said on the air that people making moves to

harm the timber industry should be slapped around.

"I said someone should slap these kind of people around, meaning generically people who are doing things to shut the timber industry down. I didn't say 'go out and get the Yosts and slap them around.'"

Almost immediately after Wittick's blast, the Yosts were accosted by members of the community, furious over what they had heard on the radio. Quickly thereafter, Wittick was informed by Mike Yost that his information was

incorrect. Wittick subsequently apologized on the radio. On Tuesday, May 4, Wittick admitted to this newspaper he had made a mistake in airing the information, adding "I didn't think to check my source."

Yost told Wittick and this newspaper the Sierra Club contacted him in 1991 wanting information for a report. That report was designed to push U.S. legislation to preserve old growth trees in the Sierra. That report is the one that was given by Coates to the

press.

Yost said last week that "Mike and Sally Yost never asked for 51 percent of the forest to be tied up." Yost said he and his wife realize that such a plan would essentially decimate the county logging industry and that is something they definitely do not want to see.

Yost said he did contribute to the report, but not to the 51 percent degree. Yost said all he and his wife

See TALKS, page 11

# Talks...

Continued from page 1

did was send a forest preserve proposal to the Sierra Club which had been developed by The Friends of the Plumas Wilderness in the mid-80s.

That proposal calls for a roadless corridor preserving 18 percent of the PNF stretching from Plumas Eureka State Park and the Lakes Basin area down the Middle Fork of the Feather River and up to the Bucks Lake Wilderness area.

"I don't work that close with the Sierra Club," Yost said Monday, May 3. "We just sent them our original plan when they asked for it."

The Sierra Club's multi-page preserve document backs Yost up. In the document it is noted that Friends of the Plumas Wilderness (in this case the Yosts) designed the forest reserve with 18 percent of the PNF. The 51 percent figure is attributed to The Sierra Biodiversity Institute, which took the Friends 18 percent plan and added another 33 percent of the forest for the Institute's recommendation of 51 percent of reserve.

But that information was not delineated in the synopsis sheet Coates gave the press last week. It flatly states the Yosts assisted in identifying potential reserve areas that add up to 51 percent of the PNF.

Coates called this newspaper early Tuesday, May 4. He said he got the reserve report and synopsis "from the Forest Service," adding that he was not the author of the synopsis.

Coates said he was willing to

divulge who from the Forest Service gave him the report and synopsis but only off the record. This newspaper refused to take the information off the record and Coates did not divulge his source.

PNF Supervisor Wayne Thornton said his office had received the Sierra Club preserve plan but does not know who sent it or the synopsis to Coates.

"If it's thought that the Forest Service provided documents to stir things up, I'm very concerned about that," Thornton said. "That paper (the synopsis) was not authorized by me and is not the way I like my people to do things." \*\*

Coates claimed the ancient forest proposal was recently sent to the Forest Service and when he heard about the 51 percent figure he became alarmed. Told that the Yosts did not want that much of the forest locked up, Coates said, "If Yost only wants the 18 percent, I'm glad to hear that. He's showing responsibility."

## Talks jeopardized

The upshot of the entire affair is that quiet talks between the timber industry and the county's environmentalists may now be in jeopardy.

Yost said Monday, May 3, that meetings between the Friends of the Wilderness, the timber industry and other environmental group have been going on "the last couple of weeks to see if there is some common ground."

Yost said those talks have left him encouraged that the timber industry and environmental groups could co-exist on the PNF.

"Some S-P (Sierra Pacific) guys

said they liked our 18 percent idea," Yost claimed. "We're trying to work out something for timber production and wildlife habitat."

But now, the release of the reserve play synopsis has hurt the chances for compromise, Yost said.

Friends of the Plumas Wilderness member Michael Jackson, who is often the spokesman for the group, said he hopes the recent brouhaha does not end discussion between environmentalists and the timber industry.

"I'm worried everyone is throwing up their hands and saying if it can't be like before than it will be nothing," Jackson said of the timber industry. "We don't want that to happen. But change is coming to the timber industry and there is still somewhat of a state of denial to that. There's enough lumber here for the mills and the environment," Jackson said Monday, April 3.

As to the talks Jackson said, "Are they jeopardized? Yes. Is it terminal? No. Am I mad at anyone? No. Am I confused? Yes."

As for Coates, Jackson said "I don't want Bill to get blown up on this either. We need Bill to lead us through the eye of the needle, he's the best. I want to stop all this and go back to the table."

"I hope the talks continue," Coates said Tuesday, May 4. "But as far as I'm concerned this was a Sierra Club document (the reserve report) that does not take communities into account."

\*\* Note that the Forest Supervisor has not said that his employees will not do something like this again!!

**[DISCUSSION DRAFT]**103D CONGRESS  
1ST SESSION**H. R. \_\_\_\_\_**

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**IN THE HOUSE OF REPRESENTATIVES**

Ms. PELOSI introduced the following bill; which was referred to the Committee  
on \_\_\_\_\_

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**A BILL**

To direct the Secretary of the Interior to conduct a salmon  
captive broodstock program.

1       *Be it enacted by the Senate and House of Representa-*  
2       *tives of the United States of America in Congress assembled,*

3       **SECTION 1. SHORT TITLE.**

4       This Act may be cited as the "Winter Run Chinook  
5       Salmon Captive Broodstock Act of 1993".

1 SEC. 2. ESTABLISHMENT OF SALMON CAPTIVE  
2 BROODSTOCK PROGRAM.

3 (a) IN GENERAL.—Subject to subsection (d), the Sec-  
4 retary of the Interior (hereinafter in this section referred  
5 to as the “Secretary”) shall conduct in accordance with  
6 this section a salmon captive broodstock program (herein-  
7 after in this section referred to as the “Program”).

8 (b) PROGRAM.—The Program shall consist of the de-  
9 velopment and implementation by the Secretary of the  
10 plan described in the document entitled “Modification of  
11 Permit #747: Application for Permit for Scientific Pur-  
12 poses Under The Endangered Species Act”, as submitted  
13 to the National Marine Fisheries Service on April 24,  
14 1992.

15 (c) CONSULTATION.—The Secretary shall consult  
16 with the Winter Run Chinook Salmon Captive Broodstock  
17 Committee (a nonprofit ad hoc committee convened by the  
18 Pacific Coast Federation of Fishermen’s Associations) in  
19 making management decisions regarding the Program.

20 (d) STATE MATCHING.—The Secretary may not im-  
21 plement this section unless not less than \_\_\_\_ percent of  
22 amounts necessary to conduct the Program are provided  
23 by non-Federal sources.

24 (e) AUTHORIZATION OF APPROPRIATIONS.—There  
25 are authorized to be appropriated to the Secretary to con-

- 1 duct the Program \$10,900,000 for the 9-fiscal-year period
- 2 beginning with fiscal year 1994.

Government Prediction Comes True:

## Pacific Coast Timber Towns in Trouble in the 1990s

Below are excerpts from a U.S. Forest Service publication, An Analysis of the Timber Situation in the United States, 1952-2030 (Forest Resource Report No. 23, December 1982). This Reagan-era Forest Service study analyzed regional trends of public and private timber supplies, as part of the agency's responsibilities to report to Congress under the Renewable Resources Planning Act, the National Forest Management Act, etc. The study says candidly that timber harvest in the West was and is above the sustained yield level, and that the cutting levels are not only liquidating the old-growth, but also are logging the "growing stock" faster than its net annual growth. The USFS predicted a timber shortage on the West Coast in the 1990s through the year 2010. The USFS forecasted that as the old-growth inventories of the Pacific Coast states were depleted:

"For the Pacific Coast, it will mean closed mills and reduced timber-based employment and income. The impacts are likely to be particularly severe in rural areas where timber is the chief source of economic activity." (p. 156)

"The projected reduction in softwood timber harvests in the Pacific Coast has implications that go beyond the impacts on the affected ownerships. Such a reduction in harvests will result in closed mills and losses in employment and income, with associated disruptions in many timber dependent communities in forested rural areas. There will also be intensified pressure for the accelerated harvesting of old-growth stands on the public ownerships and especially on the National Forests, which contain most of the remaining old-growth timber." (pp. 186-187)(emphases added)

"In 1976, about 9 percent of the softwood sawtimber products harvested in the Pacific Coast . . . came from non-growing stock sources such as dead, rough, and rotten trees. There are large volumes of such timber in the old-growth stands in this section. With the high demand for stumpage and limitations on timber supplies, the harvest of timber from this non-growing stock material is projected to rise to 3.4 billion board feet in 1990. As the old-growth stands are harvested and replaced by young stands, there will be less and less dead and rough and rotten timber to utilize. Accordingly, the supplies of softwood sawtimber from non-growing stock sources progressively decline. By 2030, it will amount to 1.9 billion board feet, less than the cut from this source in 1976." (p.187)(emphases added)

"For the western United States, removals of softwood growing stock in 1976 exceeded net annual growth by 0.3 billion board feet, or 7 percent. Removals of softwood sawtimber was [sic] nearly 30 billion board feet, or over 8 billion board feet more than net annual growth.

"These apparent imbalances in the West do not, in themselves, represent a problem on some ownerships and in some areas because a sizable part of the western timber harvest is drawn from old-growth stands where allowable harvests can exceed net growth for some time to come. Generally speaking, deficit cutting in the West is occurring on the Pacific Coast; the Rocky Mountain Region is maintaining a favorable growth-removal balance. (p.145)

*"Accelerated harvest of old-growth timber on Federal lands in the West.—*

*"The general policy on the National Forests has been the sale of timber to a quantity equal to or less than that which can be removed from each Forest annually in perpetuity on a sustained yield basis. This assures that timber from second-growth stands will be available to provide a relatively even flow of timber from National Forest lands in the future.*

*"The President has directed the Department of Agriculture, consistent with existing legal requirements, to use maximum speed in updating land management plans on selected National Forests with the objective of increasing the harvest of mature timber through departure from the above policy taking into account relevant economic and environmental implications. This could temporarily increase the volume of timber available for industry. This course, which has been supported by some members of the timber industries, some dependent communities and other associated interests, could offset for a time at least part of the expected decline in the harvest of timber from forest industry ownerships in the Pacific Northwest. However, harvests above the even flow level could not be maintained and the dependent industries and communities would sooner or later be faced with a drop in harvests." (p. 243) (emphases added)*

## Why Is Anyone Surprised by the Timber Crisis? It Was Planned

The fate of western timber towns was sealed in 1982, before the northern spotted owl was designated as a Management Indicator Species, much less listed as threatened under the Endangered Species Act. Knowing that adverse economic effects would lie ahead for timber-dependent rural communities throughout the Pacific Coast states if nothing were done, the Reagan Administration made a conscious decision to "depart" from sustained yield logging rates, thereby guaranteeing that the crisis would come sooner and be more severe.

The problem was that the harvest level "departure" did not remain consistent with environmental laws; the monitoring of land, water, and wildlife conditions that NFMA required as feedback on management decisions never occurred, and the feedback loop was never closed by the Forest Service. Now the towns, and especially the timber companies, want the Federal government to provide enough timber for a "smooth transition" down to a sustainable, legal harvest level, even when doing so would further imperil the land, water, and wildlife. The time for starting smooth transitions occurred at least ten years ago, at the very time when the ancient forest issue was just beginning to emerge as a biological and ecological problem. The Republicans dealt with the controversy by encouraging political polarization, perhaps thinking that if the "crisis" got bad enough, Congress would weaken or repeal environmental protection laws.

It would be a tragedy if the Clinton Administration were to complete what Ronald Reagan and the James Watt crowd started, i.e., the suspension or revocation of environmental protection laws in order to provide short-term relief to an industry and to rural communities that have known since the early 1980s that an economic "trainwreck" was going to happen.

A far more preferable course of action for timber-dependent rural communities would be to begin today to seek Federal, state, and private funding for land and watershed restoration projects, replanting programs, and wildfire-protection ("fuels reduction") programs. Many of these programs are already called for in the National Forests' Plans; they just haven't been funded. Other Forest-Plan programs for monitoring and base-line data collection have also not occurred. The Forest Service has repeatedly explained its failure to implement these aspects of the Forest Plans as due to lack of funding by Congress; but whether the agency has even asked for funding is unknown.



United States  
Department of  
Agriculture

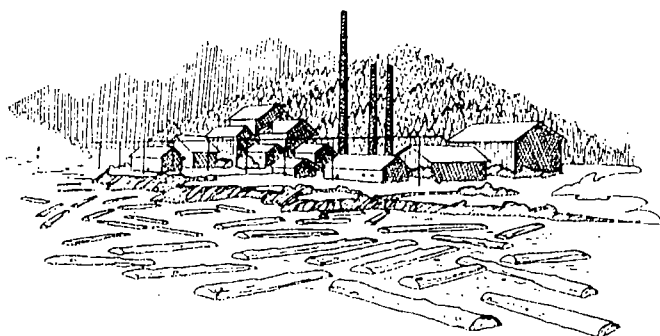
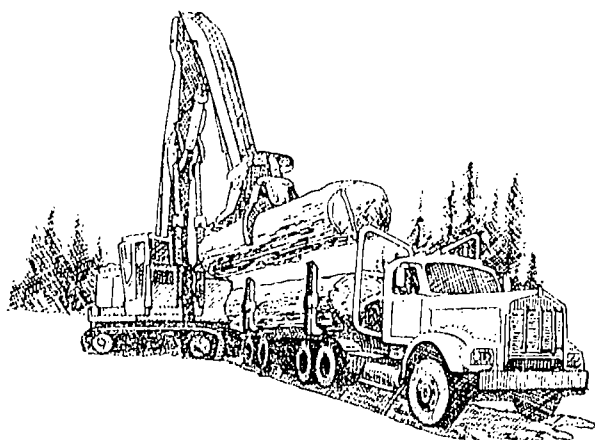
Forest  
Service

Forest  
Resource  
Report  
No. 23



(published in 1982)

# An Analysis of the Timber Situation in the United States 1952-2030



tics is not well defined. However, taking advantage of the better opportunities could increase the commercial timber base to some extent.

As described in a following section there are large opportunities for converting stands from low productivity to high productivity through a combination of practices including removal of undesired trees, planting or seeding to desired species, and control of unwanted brush or other competing growth. Species conversion has been a common practice in the South, especially on pine lands in forest industry ownerships that have been taken over by hardwoods. Converting such lands back to pine, especially where hardwood growth is slow, can significantly increase future softwood timber supplies. Most of the Coastal Plain and Piedmont regions of the South, with exception of the deep bottomlands, will grow larger volumes of pine than of hardwood timber.

Similar opportunities for species conversion are available in other regions, especially in coastal portions of the Pacific Northwest where alder and maple have replaced the original softwood forests. In addition, conversion of very productive lands along flood plains from brush and willows to fast-growing cottonwood plantations is an attractive opportunity for increasing pulpwood supplies. Such land is limited, however, to relatively small areas, nearly all along the major rivers in the South.

In some sections, and especially in the lodgepole pine types of the Rocky Mountains, there are substantial areas of stagnated stands. Removal of the present stands and replacement with properly spaced new stands of the same or different species is the only way to achieve the growth potential of such areas. Such conversion, however, may be limited by low sites or because of wildlife or other nontimber considerations.

**Improved scheduling of timber harvest.**—The largest total annual yields of timber are obtained when stands are harvested at the age where net annual growth is maximized (culmination of mean annual increment). This age is known for most forest types in the United States. Thus, careful scheduling of the age of harvest can affect overall timber production on millions of acres of land. For example, the harvest of upland hardwood forests at 50 years of age provides the largest total annual cubic volume of timber. Harvest at ages necessary for producing large-size high-quality sawtimber will reduce the aver-

age annual yields of timber.<sup>19</sup>

Many farmer and other private owners, especially in the eastern United States, keep timber stands beyond the age of culmination of mean annual increment. A significant increase in timber supplies could be achieved by harvesting these stands when the overall average annual growth begins to decline, as long as harvesting is followed by adequate regeneration. Thus, one of the important opportunities to increase timber production on the farmer and other private ownerships is to aid the owner in scheduling the harvest of stands and assuring the rapid regeneration of the area to fast-growing species.

The quality of timber produced is also related to the age of timber stands. While total volume is maximized by logging and regenerating stands at the age of culmination of mean annual increment, the quality and average value of trees may be increasing rapidly well beyond this point. This is particularly true for high-value timber such as black cherry and walnut, where large trees bring premium prices. Thus, for many species, maximizing the value or quality of annual growth will generally mean holding timber stands beyond the age at which average annual volume growth is maximized. For other species and for uses where quality is not an important factor, economic returns may be maximized by harvesting before the age where net annual growth is greatest.

#### **Accelerated harvest of old-growth timber on Federal lands in the West.**

As indicated in the discussion of timber ownership presented above, the bulk of the remaining old-growth softwood timber in the West is on National Forests and on the Oregon and California (O&C) lands in Oregon, which are managed by the Bureau of Land Management. The general policy on the National Forests has been the sale of timber to a quantity equal to or less than that which can be removed from each Forest annually in perpetuity on a sustained yield basis. This assures that timber from second-growth stands will be available to provide a relatively even flow of timber from National Forest lands in the future.

The President has directed the Department of Agriculture, consistent with existing legal requirements, to use maximum speed in updating land management plans on selected National Forests

with the objective of increasing the harvest of mature timber through departure from the above policy taking into account relevant economic and environmental implications. This could temporarily increase the volume of timber available for industry. This course, which has been supported by some members of the timber industries, some dependent communities and other associated interests, could offset for a time at least part of the expected decline in the harvest of timber from forest industry ownerships in the Pacific Northwest. However, harvests above the even flow level could not be maintained and the dependent industries and communities would sooner or later be faced with a drop in harvests. For this and other reasons, chiefly the impacts on the natural environment, harvest above even flow levels has been strongly opposed by environmental and preservation groups and many other nontimber groups interested in the management and use of the Federal timberlands.

**Reduction of losses.**—The growth of timber can be reduced by poor harvesting practices, wildfire, insects, diseases, and natural mortality. Management practices that reduce losses from these causes and result in rapid salvage of dead and dying timber can add in a substantial way to net annual growth and the volume of timber available for use.

Harvesting activities often damage residual trees and may increase the risk of insect attacks, windthrow, and fire on adjacent timber stands. Improvements in logging practices to minimize damage and the use of silvicultural methods to protect residual trees against destructive agents such as wind, insects, and disease could significantly reduce the mortality and growth loss associated with harvesting.

The largest and most effective management effort in the United States has been in control of forest fires. The results have been remarkable, with a decline in area burned from 30 to 40 million acres annually at the beginning of the century to about 5 million acres annually in the mid-1970's. The improvement in protection has contributed in a major way to the increases in net annual growth and timber inventories which have been taking place in eastern forests in recent decades.

Despite the progress that has been made, there appear to be opportunities to further reduce fire losses and costs through development and use of improved technology in fire prevention, detection, resuppression, suppression,

<sup>19</sup> Schnur, G. Luther. Yield, stand and volume tables for even-aged upland oak forests. U.S. Dep. Agric., Tech. Bull. 560. Washington, D.C., 87 p. 1937.

## Summary of the Eldorado National Forest Timber Sales Under Review

### Overview

In November of 1992, Friends Aware of Wildlife Needs and Forest Alert began a review of a handful of timber sales on the Eldorado National Forest that appeared to have been prepared and sold prior to the completion of environmental documentation. It was discovered that the procedural violations that were aparent in the handful of sales were representative of the entire 1992 timber sale program. The Eldorado National Forest has agreed to a review of numerous timber sales, beginning with the sold timber sales. The first decision to come out of this review will be presented on May 10th, at a meeting between the Forest Supervisor, John Phipps, and numerous environmental organizations.

This summary is intended to identify the many timber sales about which Forest Alert and Friends Aware of Wildlife Needs are concerned, and some of our chief concerns. Procedural violations that we have alledged are not described in detail here, and include, but are not limited to: failure to complete required environmental documentation prior to sale of timber (including cumulative watershed effects analysis); completion of Biological Evaluations after a decision was signed, with no new decision document; failure to adequately evaluate potentially significant, cumulative impacts on a variety of late seral associated species; failure to mention impacts to some MIS species (including trout); and failure to consider new info and changed circumstances (eg., CASPO; and post-salvage landscape, respectively). Furthermore, the Findings of No Significant Impact for these sales rely upon unspecified, unproven, infeasible, and unmonitored mitigation measures to protect forest resources.

And now, for lists of sales, and impacts to the forests of the Eldorado.

### Sales sold prior to 1992

There nine timber sales that are under contract on the Eldorado. Green logging has not yet been completed on these sales. "Add-on" volumes have been logged (see Salvage Sales, below) These sales are:

**Sawpit; Jerry's Pool; South Silver; Voss; Bull Plum; Capps; White Cable; Sherman; and Leek.**

### Sales sold in 1992

In 1992, the Eldorado National Forest sold 23 green timber sales. These timber sales were based on decision notices signed as early as 1977.

By the time we began investigation of timber sales on the Eldorado, six of these sales had been logged. The six **logged** sales are:

**McCulloh; Harricks; Wally World; Plummer Ridge; Cold Springs; and Oregon Gulch.**

The seventeen remaining green timber sales sold in 1992 are:

**Barney; Gold Corner; Parsley; Lyons; Shanty; West Panther; Claussenius; Sturdevant; Dogtie; Bald Mountain; Martin; Iowa; Hornblende; Forebay; North Union; Cox Canyon, and the Middle Creek Biomass thin.**

North Union and Cox Canyon are located in the Cleveland Fire area.

**Sales with decision notices that have not yet been sold**

There are also numerous sales with signed decision notices that have not yet been sold. Several of these sales are recent, and have been appeal by FAWN and/or Forest Alert. Most of these sales are not recent.

The sales that are not recent are:

**Airport; Bunker; Pilot; Steel Corral; Bankers; Bendover; Camp; and Henry's, and the Tussock and Engraver Commercial thins.**

The Recent sales are:

**Shingle Mill Gulch; Joe buck; Mixmeisster; Wauber; Grizzly.**

**Salvage Sales**

In the past four years, the Eldorado National Forest Salvage sale program has yielded volumes well in excess of the annual ASQ; the highest volume being 209 MMBF in 1990.

In addition, there exist numerous, documented instances in which snag retention levels failed to meet the Eldorado National Forest Plan's woefully inadequate snag levels<sup>1</sup>. These levels are already well below those thought to be necessary for late seral stage forest associated species, such as the spotted owl.

However, programatic insect salvage sales are planned in each of the four Ranger Districts on the Eldorado National Forest.

The recent supplements to Environmental Assessments for these programmatic salvage sales do not comply with snag retention guidelines outlined in the CASPO report, and admittedly "may (or may not)" result in a trend toward federal listing of the spotted owl.

In addition to these sales, numerous, individual green timber sales regularly have salvage ("dead and dying") volume added as the sale progresses. This often occurs in stands adjacent to cutting units planned in green timber sales, or within sale units on top of the planned logging associated with that timber sale, and thereby exacerbates the potential for cumulatively significant effects.

In addition to insect salvage, the Eldorado also plans to log approximately 160 mmbf of fire salvage off of the area affected by the Cleveland fire.

And, finally, the Eldorado plans to conduct an intensive "hazard tree" removal program within 150 feet of many roads, that is expected to provide a sawlog volume of 30 mmbf.

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<sup>1</sup>Failures to meet Forest Plan snag retention guidelines are documented in the Eldorado National Forest's 1992 monitoring report; and in several recent EA's, including the recent district programatic salvage EAs and the Mixmeisster Timber Sale EA.

and 15 mmbf or more for fuelwood and "other" forest products. Approximately one half of all spotted owl sites are located within the area affected by this project.<sup>2</sup>

### **Potentially Significant Effects**

Many of the green timber sales mentioned above were delayed for several reasons, including the large volume of salvage timber that was cut during the past ~~for~~ years.

As a result, the many green timber sales are all planned to occur over the next one or two years.

Most of the green sales plan clearcut and/or overstory removal logging methods.

The potentially significant cumulative impacts include:

- Fragmentation of biological corridors for late seral associated species, which may result in population isolation.

Example: In the North Fork of the Consumnes River watershed, there are as many as 11 contiguous green timber sales. Many of these timber sales involve road construction. Many of these timber sales are located in an area that is intended as a corridor for marten and fisher; intensive logging would occur up to the 300 foot wide movement corridor. Intensive salvage logging has already degraded late seral stage habitat in this area. A similar situation exists in the Rubicon River watershed.

- Cumulative impacts of logging in streamside management zones on older forest associated species and riparian ecosystems (Logging in SMZs is permitted in the Eldorado Forest Plan).

- Impacts on candidate W&S rivers, including the Rubicon, Consumnes, and Mokelumne.

Logging is planned in tributaries of these rivers that are already over "threshold of concern" (ie, heavily degraded).

Intensive logging is also planned within candidate river corridors.

- Impacts to viability of local populations of spotted owl.

The green timber sale Decision Notices listed above number 46. Logging is complete for six of these sales. Of the remaining green sales, we have conducted a review of 12 cumulative effects analysis documents for the spotted owl. At the time of that review, we lacked documentation for all 46 timber sales. The 12 sales reviewed appeared likely to affect as many as 30 known nest stands. Preliminary information indicates that many of the other 34 timber sales would also affect spotted owl nest stands. There are 186 known spotted owl "activity centers" on the Eldorado National Forest.

The hazard tree removal project will effect as many as half of the known nest stands for spotted owls on the Eldorado National Forest.

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<sup>2</sup> See Hazard Tree Removal EA, Eldorado National Forest.

Programatic salvage logging has already reduced available levels of snags to well below quantities recommended by the CASPO report in many areas.

The CASPO report did not analyze what impact such a high density of timber sales would have on the local populations of spotted owls on the Eldorado National Forest.

Degradation of spotted owl habitat forestwide by salvage logging may contribute to a trend towards listing of the spotted owl, according to the Forest wildlife biologist (Biological Evaluation for Pacific RD salvage sales).

In summary, the impacts to known spotted owl nest stands are numerous; planned habitat degradation is widespread; cutting methods, locations, and guidelines diverge drastically from the practices recommended in the CASPO report. The cumulative effects of the massive quantity of habitat destruction and degradation planned to occur in the next two years must be thoroughly evaluated. Given the information presented in the Environmental Assessments mentioned above, it appears likely that well over half of the known pairs of the California spotted owl on the Eldorado National Forest will be impacted in some way by logging planned within protected activity centers (300 acre nest stands surrounding nest sites). In addition, habitat degrading logging, such as further reduction of snag levels, and fragmentation resulting from clearcutting and other logging methods that severely reduce canopy closure, is planned over large portions of the Eldorado National Forest.

- Potential cumulative impacts on rare plant populations.

Rare plant populations are generally protected by a "limited operating" period for timber sales, rather than by excluding the rare plant habitat from the proposed timber sale. No analysis of the cumulative impacts of all the planned timber sales on rare plants and their habitat has been completed.

- Loss of large woody debris.

In addition to a reduction of standing dead trees, salvage logging and fuels treatment focus on removal of large woody debris (downed logs) from the forest floor. Large woody debris is a critical component of late seral stage habitat, and riparian ecosystems.

- Cumulative impacts on late seral stage ecosystems has not been evaluated.

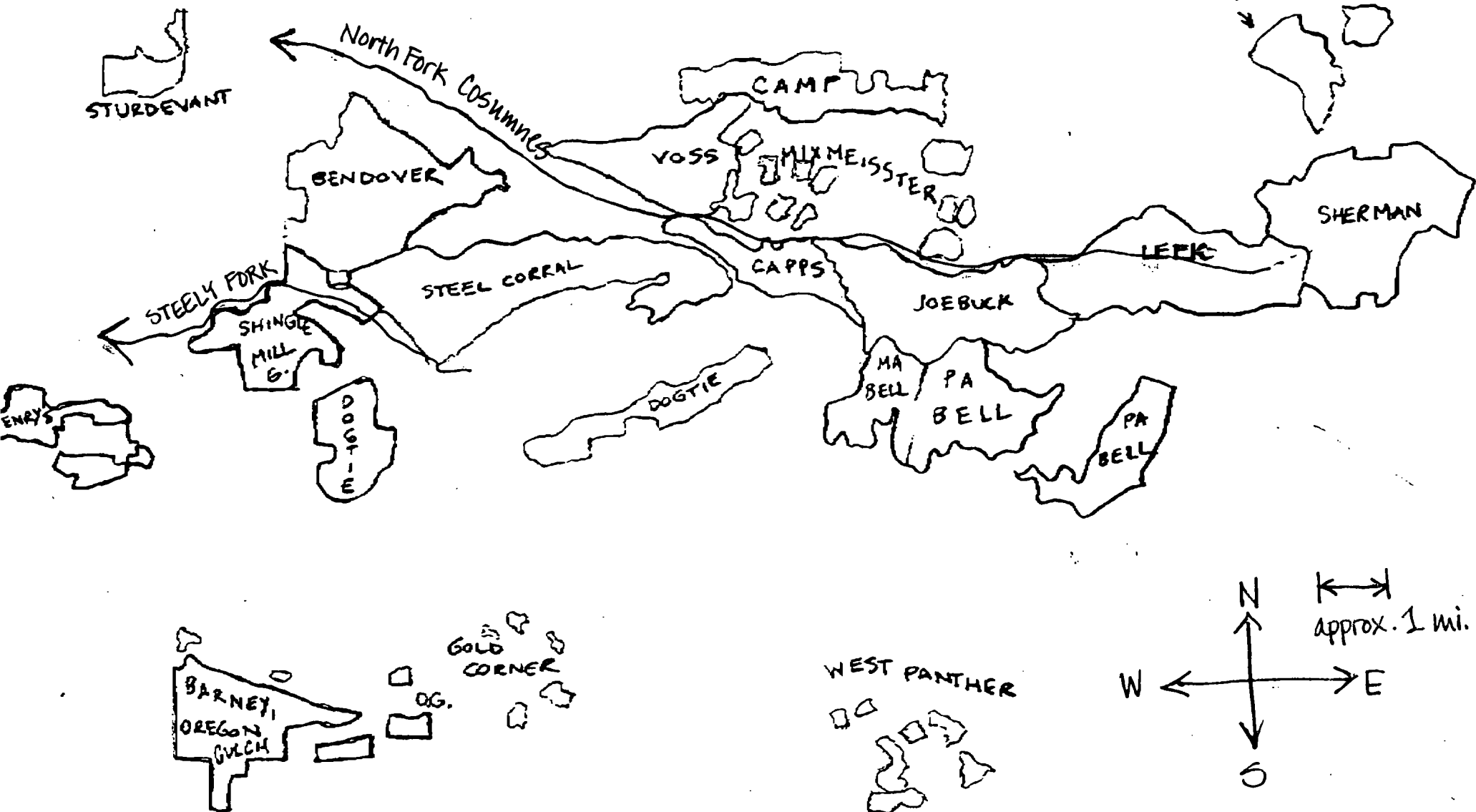
### **Conclusion**

The many intensive logging activities planned on the Eldorado National Forest must be viewed in light of the fragmentation and degradation of late seral habitat that has occurred on this Forest in the past. The Eldorado National Forest lies in the center of the Sierra Nevada range. This National Forest is a critical link in maintaining wide ranging older forest associated species populations; is well used for recreational purposes; and is the source of many high quality and unique watersheds. This National Forest also has planned logging over the next two years that is likely to exceed or come close to the total volume logged off of the other 6 Sierran National Forests for the same period.

For more information, please contact Erin Noel of Forest Alert, at (916) 292-9253, or Tom Infusino and Craig Thomas of Friends Aware of Wildlife Needs, at (916) 333-0269.

# Eldorado National Forest

These are some of the green sales  
sold but under reconsideration,  
along the North Fork of the Cosumnes River.  
All were FONSI's with no cumulative effects,  
according to the Forest Service.



deleted as described in the spotted owl recommendations, Alternative 3, and the Mixmeister CEA.

The entire proposed Mixmeister Timber Sale falls within the Slesk (1989), Rathole (1990), and Peanut Beetle (1991) Salvage Sales. Peanut Beetle was given an extension and was salvaged again in 1992. Current green sales in the area are the Voss and Quinn (1992) Timber Sales which boarder the west and east boundaries of the proposed sale area. Forseeable future activities are the proposed Camp Cable (1993), Steel Corral (1993), and Joe Buck (1994) Green Sales. All of these proposed green sales are adjacent to the proposed Mixmeister sale area.

Due to the amount of fragmentation from previous sales, the proposed sale area has the potential of becoming a barrier to species needing to use it for migration. In addition, species which are utilizing habitat within the area could be displaced if further fragmentation of preferred habitat occurs within it. The past harvest prescriptions (mostly clearcuts and the removal of overstory trees) has created hazardous fire conditions within the existing stands. Without prescribed burning and thinning of the understory thickets of cedar and white fir, the remaining suitable habitat in the area is likely to be destroyed by crown fires. Snags and down logs are also deficient within the units surveyed, reducing the capability of the stands to support cavity nesters and invertebrates dependent on decaying matter, retain water for fungus and regenerating trees, and provide den sites for wildlife. In addition, based on information in the CASPO report, the continued loss of large overstory trees will detrimentally affect spotted owl habitat over time. Measures to retain large trees, snags, and down logs for this project and future projects in the area will be necessary to maintain future management options for the California spotted owl and other TES species dependent on late seral stages. With the implementation of all of the above recommendations for the appropriate alternative selected, the adverse impacts to sensitive species are reduced.

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4. Fish and Wildlife Service Species List #1-1-93-SF-116. United States Department of the Interior, Fish and Wildlife Enhancement, Sacramento Field Office. Dec. 3, 1992.
5. Fowler, C. Habitat Capability Model for the Northern Goshawk. USDA Forest Service, Tahoe National Forest. May, 1988.
6. Fowler, C., Valentine, B., Sanders, S., and Stafford, M. Habitat Suitability Index Model: Willow Flycatcher. USDA Forest Service, Tahoe National Forest. March, 1991.
7. Freel, Meaton. A Literature Review for Management of the Marten and

FROM MIXMEISSTER TS, ON THE PLACERVILLE RD.,  
EL DORADO NF

from Mixmeister Timber Sale B.E. (2/93)  
- all sales covered by FONSI's, but this one  
cumulatively "breaks the camel's back"



[illegible]



VIA FACSIMILE

May 12, 1993

Ronald Stewart, Regional Forester  
Pacific Southwest Region  
USDA Forest Service  
630 Sansome Street  
San Francisco, CA 94111

Dear Mr. Stewart:

In preparation for our meeting on May 19, we are raising several concerns with you regarding timber management on the Eldorado National Forest. We request that you look into these problems and provide us with answers to our questions articulated below.

As you may know, several environmental groups in the central Sierra Nevada have documented violations of the National Environmental Policy Act by the Eldorado National Forest. Below, we briefly recount the evidence of these violations, described in detail elsewhere.<sup>1</sup>

On December 10, 1992, the Eldorado Forest Supervisor issued a list of green timber sales included in the 1992 sale program. The document listed Findings of No Significant Impact (FONSIs) for timber sales on the Eldorado and specified the environmental documentation<sup>2</sup> which had not been completed for those sales. The volume of the listed sales amounts to over 100 million board feet.

Of the 28 FONSIs that have not yet been cut, 26 decisions were signed prior to the completion of environmental documentation; and 14 decisions were based upon Environmental Assessments that were dated prior to 1985 without sufficient updating.

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<sup>1</sup> See, for example, letter from Forest Alert to Supervisor Phipps, dated November 18, 1992.

<sup>2</sup> For the purposes of this letter, "environmental documentation" includes any of the following: Environmental Assessments, Archeological Reconnaissance Reports, Wildlife Biological Evaluations, Plant Biological Evaluations, Cumulative Watershed Effects Assessments, and Cumulative Effects Analyses for the California Spotted Owl.

Ronald Stewart  
May 12, 1993  
Page 2

The basis for our concern is evident: the Forest Service has not completed the environmental review required under NEPA (that is a necessary prerequisite for issuing a FONSI) for the majority of its timber sale program.

On March 22, 1993, NRDC submitted a letter pursuant to the Freedom of Information Act to the Eldorado Forest (attached) requesting documents that describe and justify the Forest's premature finding of no significant impact (including a copy of the Forest Supervisor's original document). In response, we received a half-page letter from the Forest stating "we do not have any documents that directly respond to your request."

Based upon the evidence available to us at this time, we are convinced that NEPA compliance on the Eldorado is highly suspect. The Forest has neither completed its environmental reviews (by its own admission) nor has it furnished us with an explanation for proceeding in the absence of environmental analyses.

In a related concern, we believe that the Forest's compliance with NFMA is equally suspect. Our concerns relate specifically to the impacts of the Eldorado's actions under the Cumulative Effects Analysis process on spotted owl viability.

In a letter to you dated October, 1991, NRDC explicitly warned you that the Cumulative Effect Analyses for the California spotted owl (CEAs) prepared by the Forests were unreliable and inaccurate. We stated that:

[w]e are left with the strong suspicion -- well supported by our past experiences with the Forest Service's timber strata information -- that the habitat delineations are inaccurate and incomplete and could lead to the harvest of owl habitat where it should not occur.

In our letter, we underscored the overly generous discretion allowed to the Forests in identifying suitable habitat, and reiterated that this discretion could easily be abused. We cited the Eldorado's timber sale program as a particular example:

Given the degree of uncertainty and unreliability in the habitat assessments it is likely that Forests are assigning a "nonsuitable" classification to lands that are, in fact, suitable habitat.

For example, the Harricks CEA proposes harvest in multistoried stands with 45% canopy cover, containing ten 20-inch-dbh trees per acre. The Regional Office should require rigorous documentation of this type of potentially suitable habitat before approving timber sales.

Ronald Stewart  
May 12, 1993  
Page 3

During the period between October 1991, when we warned you that the CEA process requires additional oversight, and March 1993, when the CASPO recommendations became Regional policy, the Eldorado National Forest approved 28 timber sale CEAs. Most of these CEAs violate the standards established by your office by misidentifying habitat and allowing logging in owl habitat where it should not occur.

Specifically, based upon our analysis of 20 out of the 28 CEAs in question, the Forest has decided to log in the vicinity of 41 owl nest sites which coincide with the Protected Activity Centers established in the CASPO report.<sup>3</sup> The Eldorado asserts in its CEAs that this habitat is "marginal" or "unsuitable" habitat. Yet the CASPO team recommends the full protection of these prime habitat nesting areas -- rendering the judgement of the Eldorado staff dubious. Indeed, most of the Eldorado's 140 mbf volume this year has been justified as "marginal" or "unsuitable" habitat.

Based upon all of these facts, we can only conclude that the Eldorado National Forest -- in an effort to avoid anticipated restrictions resulting from the CASPO study (i) "fast-tracked" outdated sales from the 1980s in an effort to preempt new logging restrictions, (ii) disregarded the environmental laws requiring the agency to conduct complete environmental review, and (iii) abused its professional discretion under the Region's CEA process by falsely identifying spotted owl habitat as "unsuitable."

For the purposes of our meeting on May 19, we have the following questions:

- 1) What was the Forest Service's basis for the expedited Findings of No Significant Impact for 26 timber sales without complete environmental review?
- 2) What actions is the Region prepared to take regarding the 13 sales that have been sold and regarding the 15 sales that have not yet been awarded?
- 3) In light of the discrepancy between the conclusions in the Eldorado's CEAs and the findings in the CASPO report, did Regional Office consult with the Technical Team to insure that the Team had considered this level of impact upon the owl nest sites in its final report? If the consultation occurred, how was that information incorporated into the Environmental Assessment for the Interim Guidelines? If it did not occur, what process is the Region

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<sup>3</sup> This is based upon the limited operating periods imposed on logging within 1/4 mile of nest sites and amounts to approximately one quarter of the 177 PACs on the Eldorado. Had the Eldorado Forest furnished the documents that we requested in our FOIA request, we would have assessed the remaining 8 timber sales.

Ronald Stewart  
May 12, 1993  
Page 4

prepared to undertake to fully assess the impacts of the proposed logging in and around PACs so that agency actions fully comply with the National Forest Management Act?

4) Based upon the questionable judgement and intentions of many line officers within the agency, what action is the Region prepared to take to insure that the National Forests will be properly managed in the future? Specifically:

\* in light of public statements made by timber officials on the Plumas, Eldorado, and Sequoia National Forests -- that they do not intend on following the CASPO recommendations -- what specific actions will the Region take to insure that all of the National Forests conduct timber planning in full accordance with the CASPO recommendations. In particular, how will you insure that Forest personnel will not continue to breach their discretion in defining PACs, "selected timber strata," and "other timber strata"?

5) We request that no FONSI's be signed on the Eldorado until this matter is resolved.

In closing, NRDC's decision to support your efforts to implement the CEA process assumed that the agency would act with integrity. Based upon the agency's track record, we have powerful reasons to question that integrity. We are left with the strong suspicion that many agency staff are unlikely to follow the new CASPO guidelines -- a policy that similarly places considerable discretion in the hands of line officers -- in a manner that fulfills the CASPO mandate on the ground, despite your best intentions. These considerations militate strongly in favor of policies that establish forested areas off-limits to "management", such as HCAs, in order to insure the viability of species.

Thank you for your consideration.

Sincerely,



Sami Yassa  
Senior Project Scientist

cc: Hon. Barbara Boxer  
Hon. Dianne Feinstein  
Hon. George Miller  
John Phipps



# THE WILDERNESS SOCIETY

CALIFORNIA/NEVADA REGIONAL OFFICE

May 12, 1993

John Phipps, Forest Supervisor  
El Dorado National Forest  
FAX: (916) 621-5297

Dear Mr. Phipps:

The Wilderness Society was appalled to learn about 46 timber sales through 1992 that are in complete violation of CASPO. In addition many of these sold sales have also repudiated major requirements of both NFMA and NEPA. We join with our colleagues at NRDC, Friends Aware of Wildlife Needs, Forest Alert and others to request that you do not sign FONSI's but instead order an EIS to be prepared for each sale along the Consumnes and Rubicon Rivers.

We recognize that this action will require cancellation of contracts, and withdrawal of prior decisions. However, this is far better than proceeding with an illegal contracts or destruction of major ecosystems. In the riparian corridors, loss of ecological integrity and late seral stage attributes will be a loss for generations to come.

It was incredulous to us that there were 11 contiguous green timber sales planned for the North Fork of the Consumnes River watershed including road construction. Many of the sales are located in an area that is considered an important corridor for marten and fisher. We understand that a similar approach is planned in the Rubicon River watershed.

Most of the green timber sales are planned during the next two years thereby creating an irreversible impact on the El Dorado National Forest and on the nesting sites for spotted owls. A review by Forest Alert of 12 green sales showed as many as 30 known nest sites. There are a total of 186 known spotted owl "activity centers". this preliminary analysis indicates the severity of the problem. This was confirmed by an additional review of the remaining 34 timber sales which would also affect spotted owl nest stands.

We cannot understand what has happened to CASPO standards? If you think that this is ecosystem management, it will sadly be the end of the entire ecosystem due to thoughtless management.

We are shocked that the principles and goals of CASPO are completely violated with these sales. In addition the violations of NFMA and NEPA cannot be tolerated. Again, we urge you to act judiciously and order an EIS to be prepared for each sale on the Consumnes and Rubicon Rivers.

Sincerely,

  
Joan Reiss  
Regional Director

cc: Ron Stewart, Regional Forester  
Congressman George Miller  
Senator Barbara Boxer  
Senator Diane Feinstein



FRIENDS  
OF THE  
RIVER

## Wild & Scenic Issues & Eldorado NF Timber Sales

*Submitted by Steven L. Evans, Conservation Director, Friends of the River,  
909 12th Street, Suite 207, Sacramento, CA 95814, (916) 442-3155.*

*April 1, 1993*

### General Issues

The two primary mandates of the Wild & Scenic Rivers Act are the prohibition against new dams and diversions and the protection of outstandingly remarkable (OR) values. The Forest Service Manual (FSM) requires interim protection of OR values for all rivers determined eligible in the planning process. Therefore, any Environmental Analysis (EA) for a timber sale within or adjacent to an eligible river corridor must analyze possible impacts on the river's OR value (such as the Rubicon's outstanding wild trout fishery).

In addition to the absolute mandate to protect OR values, the FSM and federal guidelines provide guidance on management within eligible river corridors based on classification. Eligible rivers are tentatively determined to be Wild, Scenic and/or Recreational.

Logging activities are generally prohibited on Wild rivers. Logging must not have a "substantial adverse effect on the natural appearance of the river or its immediate environment" on Scenic rivers. A full range of logging activities is allowed on Recreational rivers but adverse impacts on river values must be avoided.

### Desired Visual Quality Objectives

The logical Visual Quality Objective (VQO) by classification would be Wild=Primitive, Scenic=Retention, Recreational=Partial Retention. I can't imagine how any river could be managed under VQO Modification and still avoid impacts on river values. But VQO standards (as well as other measurable objectives such as Recreational Opportunity Spectrum) must also be tied to protection of OR values.

### Manage For Classification And OR Value Protection

Federal agencies often focus on managing for a river's classification and ignore or assume that this automatically assures protection of OR values. Classification and OR values are not necessarily synonymous or even related. Management can meet all the necessary guidelines to maintain classification and still violate the intent of the Act by degrading OR values. Management should be appropriate to the classification and ensure protection of OR values. For example, a Recreational river with an outstandingly remarkable scenic value (as opposed to a Scenic classification) should have higher visual protection than VQO Partial Retention.





## Visual Quality Beyond W&S Corridor

Another commonly ignored provision of the FSM is the requirement that "special emphasis" be given to scenic views outside the standard 1/4 mile corridor for Scenic and Wild rivers. Despite this provision's vagueness, it clearly mandates consideration of visual impacts beyond Scenic and Wild river corridors in the EA process and certainly implies that a higher level VQO be applied to areas within view of the corridor.

## Specific Issues

There are eleven river segments on the Eldorado National Forest eligible for Wild & Scenic status (see attached data base). Of these, the Rubicon River, North Fork Cosumnes River, Middle Fork Cosumnes River, North Fork Mokelumne River and its tributaries (Beaver, Cole, Green Creeks and Lower Bear River) appear to be the most affected by the Forest's on-going timber program.

The periodic list of environmental analysis in progress doesn't necessarily have anything to do with what is being sold and what is being cut due to name changes and boundary adjustments, emergency salvage, etc. Because the Forest's timber program is a moving target, it is difficult to ascertain what activities may be threatening Wild & Scenic values.

The following is almost certainly an incomplete list of current sales which may impact Wild & Scenic values:

Rubicon River - Grizzly Buy-Out, Waubear, Parsely Cable  
NF Cosumnes - Mixmeister, Joe buck, Shingle Mill Gulch  
MF Cosumnes - Barney, Gold, Ma Bell  
NF Mokelumne - West Panther

## Rubicon

Sales adjacent to the Rubicon could increase cumulative watershed impacts and adversely affect the river's outstandingly remarkable wild trout fishery. At least one watershed in the Grizzly sale is beyond TOC in terms of cumulative effects and the Waubear sale used non-standard CWE methodology. There is no mention of visual impacts beyond the Rubicon's Scenic and Wild segments in the Grizzly and Waubear EAs.

## Cosumnes

Cumulative watershed impacts could also degrade the North Cosumnes' outstanding recreation and hydrological values. A 1991 CWE for the North Fork Cosumnes pegged the 1991 ERA level at 13.1% and predicted that existing and proposed logging would punch the ERA up to 14.1%. The probable TOC is 14-16%. But the Mixmeister EA pegs the current

ERA at 12.1% and predicts a future ERA of 12.7%. An overlay of current plantations and proposed harvest units shows an unusually intense level of logging in this area.

Clearcut units within the 1/4 mile corridor are evidently proposed in the Joe buck sale. In addition to cumulative watershed impacts, we are concerned about visual quality and impacts on OR values, particularly dispersed recreation activities such as camping and fishing (no one likes to recreate in a clearcut).

### Mokelumne

Presumably, all sales within the Mokelumne Archaeological Area ensure protection of cultural values, and are therefore protecting the one officially identified OR value (cultural) of the North Fork Mokelumne and its tributaries. We are concerned about continued salvage logging in the canyon (Canyon Helicopter in 1989, Give A Hoot in 1992, on-going district-wide salvage activities) eventually impacting visual quality in and adjacent to the Scenic and Wild segments of the North Fork.

The Mixmeister EA admits that salvage activities increased fuel loadings by 30-60+ tons per acre, prompting speculation as to whether the same problem could be occurring in the Mokelumne's intensely "salvaged" canyon.

### Appeal Changes

None of the EAs I have reviewed have provided sufficient information concerning Wild & Scenic issues to determine whether district planning personnel are even aware of the changes in eligibility and classification as a result of the Chief's 7/16/91 decision in response to F.O.R.'s appeal of Eldorado LMP. A summary of the Chief's decision follows (by river):

*NF & MF Cosumnes:* The Chief vacated the decision that these segments were not suitable and directed the Regional Forester to re-evaluate their suitability prior to any decision that may affect the river's free flowing character and OR values, either through an LMP amendment or project level NEPA analysis. The standard 1/4 mile wide W&S corridor will be utilized in the EA process.

*Rubicon:* The Regional Forester was directed to amend the Eldorado LMP to upgrade Rubicon segments 2 and 3 from Scenic to Wild.

*North Fork Mokelumne:* The Chief adopted the Regional Forester's discussion of visual quality for both the Mokelumne and Rubicon rivers (Wild VQO is preservation, Scenic VQO is retention).

These changes must be incorporated into any EA process which affect these rivers.

| River              | NF or RA    | Miles | Status          | OR Value | District & Rep    | Threats                                                    | NRI |
|--------------------|-------------|-------|-----------------|----------|-------------------|------------------------------------------------------------|-----|
| NF Mokelumne River | Eldorado NF | 6.5   | Recommended     | HC       | 4 - Doolittle (R) | Devils Nose dam, Give A Hoot timber sale                   | no  |
| NF Mokelumne River | Eldorado NF | 10.5  | Not Recommended | HC       | 4 - Doolittle (R) | Devils Nose dam, West Panther timber sale                  | no  |
| Rubicon River      | Eldorado NF | 29    | Recommended     | F        | 4 - Doolittle (R) | Waubear, Ramsey, Tussock, Grizzly, Parsely timber sales    | yes |
| Beaver Creek       | Eldorado NF | 3     | Under Study     | HC       | 4 - Doolittle (R) | Give A Hoot timber sale                                    | no  |
| Caples Creek       | Eldorado NF | 10    | Under Study     | R,F      | 4 - Doolittle (R) | Footrail hydro, EDCWA water diversions                     | no  |
| Cole Creek         | Eldorado NF | 6     | Under Study     | HC       | 4 - Doolittle (R) | Give A Hoot timber sale                                    | no  |
| Green Creek        | Eldorado NF | 2     | Under Study     | HC       | 4 - Doolittle (R) | Green Springs timber sale                                  | no  |
| Lower Bear River   | Eldorado NF | 5     | Under Study     | HC       | 4 - Doolittle (R) | Give A Hoot timber sale                                    | no  |
| SF American River  | Eldorado NF | 25    | Under Study     | R,HC     | 4 - Doolittle (R) | UARP hydro, EDCWA water diversions                         | no  |
| Summit City Creek  | Eldorado NF | 6     | Under Study     | R,S      | 4 - Doolittle (R) |                                                            | no  |
| MF Cosumnes River  | Eldorado NF | 22    | Under Study     | R,H      | 4 - Doolittle (R) | Pipe Cable, Twin Gulch, Barney, Gold, Ma Bell timber sales | yes |
| NF Cosumnes River  | Eldorado NF | 24    | Under Study     | R,H      | 4 - Doolittle (R) | Mixmeister, Joebuck, Shingle Mill Gulch timber sales       | yes |

CUMULATIVE WATERSHED EFFECTS (CWE) ANALYSIS  
for the Upper North Fork Cosumnes River Watershed  
on the Eldorado National Forest, Placerville District

Report of March, 1991

ABSTRACT

This report is a preliminary Cumulative Watershed Effects (CWE) Analysis of Upper North Fork Cosumnes River watershed. The entire stream channel system has not been surveyed. This survey is necessary to refine the Natural Sensitivity Index and assign a Threshold of Concern (TOC).

Upper North Fork Cosumnes River watershed has a Natural Sensitivity Index (NSI) of 44, which is moderate. The current level of land disturbance is moderately high, with 13.1 % of the watershed as Equivalent Roaded Acres (ERA). The proposed 1991 Rathole, Peanutbeetle, and Pitchstreamer Tractor Insect Salvage Sales, the Hotshot Helicopter Insect Salvage Sale, in combination with Whites and Voss green sales, which have already sold, would increase the level of disturbance to 14.1 % ERA. Although a Threshold of Concern (TOC) has not been set for this watershed, this level of disturbance has reached the lower end of the probable TOC range of 14 to 16 % ERA. A survey of the channel system is necessary to determine if this watershed is experiencing adverse cumulative watershed effects. A Watershed Improvements Needs (WIN) Inventory should be completed for this watershed to determine areas in need of rehabilitation. Future management activities may require additional mitigation measures including watershed rehabilitation projects to reduce the potential for adverse CWEs.

INTRODUCTION

The purpose of this report is to estimate the potential risks of Cumulative Watershed Effects (CWE) on Upper North Fork Cosumnes River watershed. Pacific Southwest Region methodology (USDA, 1987) as adapted for use on the Eldorado National Forest (Kuehn and Cobourn, 1989) was used to conduct this analysis. The analysis was accomplished in two main phases: 1) the computation of a Natural Sensitivity Index (NSI), and 2) the compilation of a Land Disturbance History (LDH), by computing Equivalent Roaded Acres (ERA). This is a preliminary report as the necessary channel and watershed field surveys have not been completed.

PHASE 1. Establishing the Natural Sensitivity Index

Watersheds may differ greatly in their response to natural and human impacts. Some watersheds are more fragile and sensitive to disturbance than others. These sensitive watersheds will react to produce adverse CWE at a lower level of management activity than more stable watersheds. Therefore, before a watershed's potential to respond negatively to various natural and human caused events can be determined, its NSI needs to be estimated.

The method for establishing the NSI must be reproducible and based on existing or easily obtainable data. The Soil Resources Inventory (SRI) is used to obtain information on soil erodibility and hydrologic characteristics. The Streamside Management Zone (SMZ), is used to indicate both the sensitive riparian areas and the presence of unstable lands associated with the valley inner gorge. The GRI is used to identify areas of active mass wasting.

## **RECOMMENDATIONS ON ADDRESSING NORTHWEST FORESTRY ISSUES**

**May 18, 1993**

### **Release federal timber.**

- Release federal timber immediately to ensure the region's economic survival and help restore a realistic wood supply-cost balance that will prevent wood from being replaced in the marketplace by less environmentally-friendly alternatives.
- Private lands cannot now nor never will be able to make up for the loss of federal timber because of statutory harvesting restrictions in the western states. Southern private lands cannot make up the difference either, especially for quality sawtimber.

### **Habitat protection exchanges.**

- Swapping public and private land could consolidate high quality owl habitat in public ownership and release other land for private sector management. This would lead to more efficient management of all resources and better protection for the owl.
- Streamline the existing exchange process to make this a viable option.

### **Include provisions for private land in you plan.**

- Private lands must be involved in any Administration plan, because they are being impacted by the current situation.
- Establish a reliable process that can be used to make case-by-case decisions on a factual basis. The process must involve all stakeholders, not be superseded by frivolous lawsuits, and strike a balance between environmental protection and economic health.
- Acknowledge that following state forest practices act provisions for owl protection is adequate compliance.
- Conduct an objective re-evaluation of owl habitat requirements in conjunction with scientists from the private sector and academia that is based on all available owl data.
- Streamline the Habitat Conservation Process under the Endangered Species Act to make it more accessible to landowners and make other needed changes to assure the ESA is efficiently and equitably implemented.

### **Work with the private sector and academia to define the concept of ecosystem management and how it should be implemented.**

- Ecosystem management is an evolving discipline and no sector (government, academia, or private) has all the answers yet. Cooperatively funded research can help us put solid science behind the concept and establish realistic approaches to implementing it on the landscape.

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- derives about half of its revenue from paper and packaging; the other half from its land holdings, wood products, specialty and distribution businesses;
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- is the nation's 33rd largest employer (according to Fortune magazine's April, 1992 edition)
- exports from the U.S. to more than 70 nations...total export sales in 1991 totalled \$1.1 billion;
- operates 30 pulp, paper and paperboard mills, 54 converting and packaging plants, 250 wholesale and retail distribution branches, 29 wood fiber and wood products facilities and 35 specialty products plants;
- is one of the nation's largest private landowners; total acreage is approximately 6.2 million, about 4.5 million of which is in the South;
- harvests about 1.8 billion board feet of timber annually;
- owns 300,000 acres of land in Oregon and Washington;
- operates a containerboard mill at Gardiner, Oregon and Masonite facilities in Ukiah, California, and Pilot Rock, Oregon, employing 880 people; and
- has closed a sawmill in Gardiner, Oregon, and a pulp mill at Hoquiam, Washington (joint venture with ITT Rayonier) as a result of the high cost/limited fiber supply situation resulting from decreased availability of federal timber.

May 18, 1993

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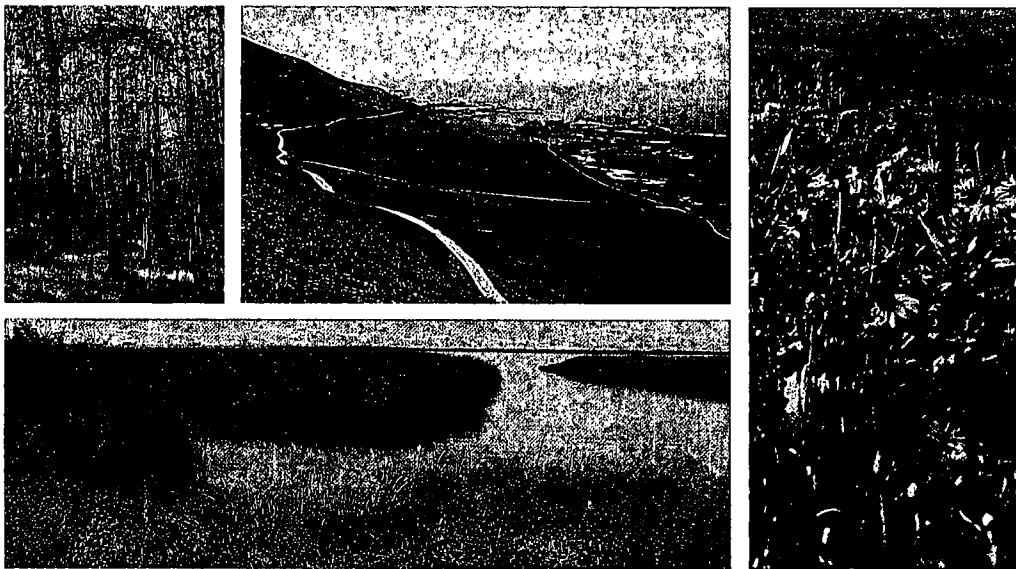
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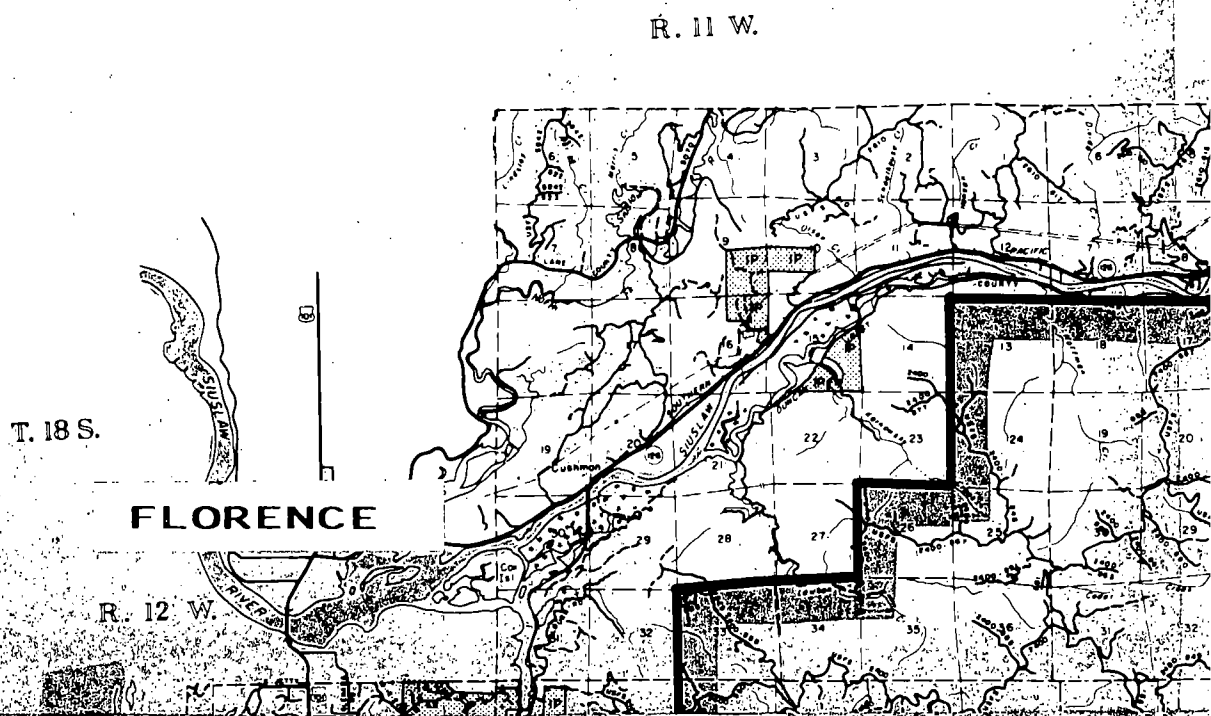


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(JANUARY 15, 1992 FINAL DESIGNATION)

PREPARED FEBRUARY 3, 1992



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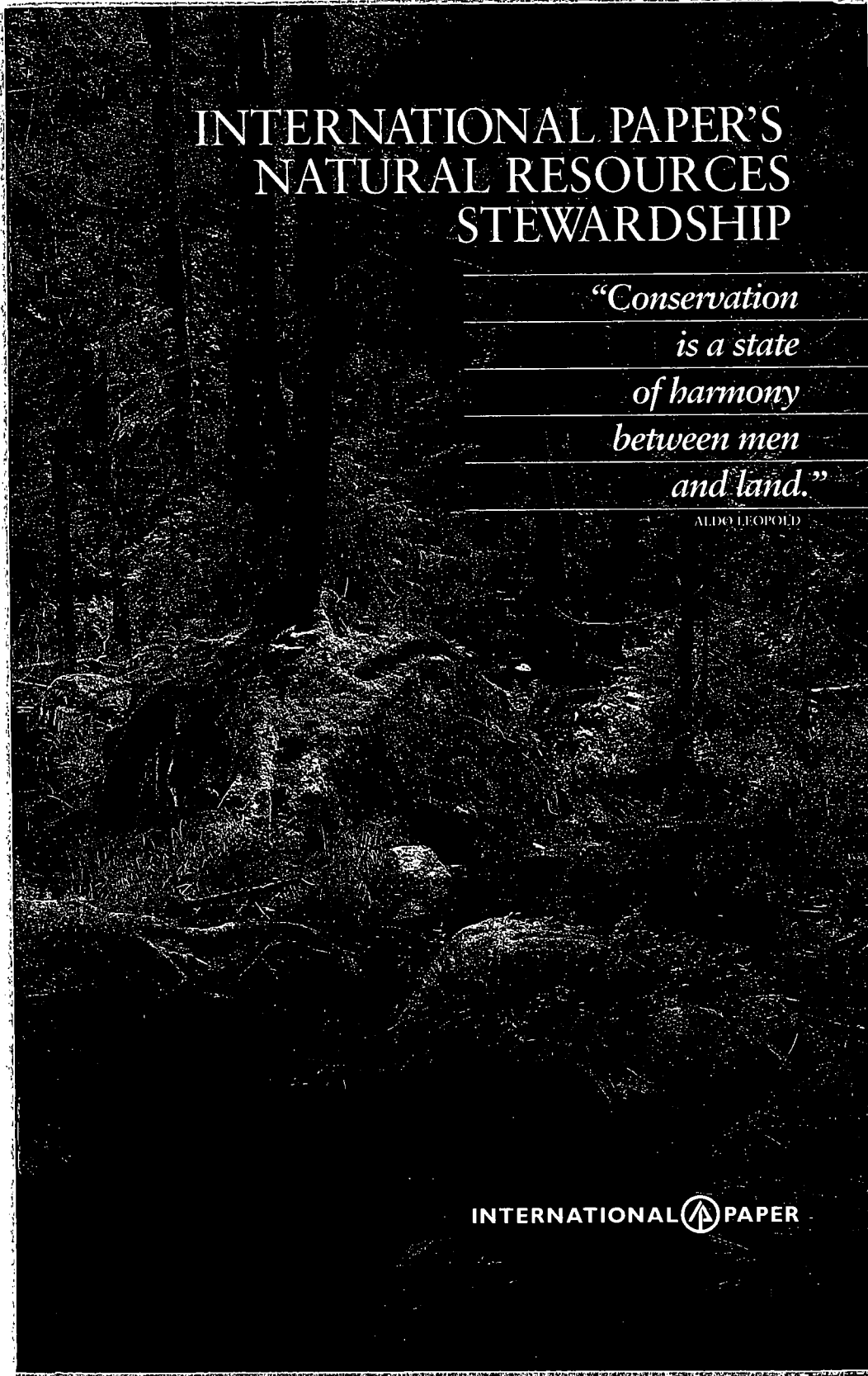
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# INTERNATIONAL PAPER'S NATURAL RESOURCES STEWARDSHIP

*"Conservation  
is a state  
of harmony  
between men  
and land."*

ALDO LEOPOLD

INTERNATIONAL  PAPER