"Mother Nature takes an interest in those who look after her. That is why the most affecting place in a forest is the location where, without your personal efforts, there would have been a clearcut."

Jim Britell

Illustrated Guide To Finding Defects In Timber Sales

By Jim Britell

Illustrations Joan Geiser

Layout Karen Kjelgaard

"Jim is one of the best grassroots leaders I have ever known, his books are required reading for all grassroots activists."

Brock Evans retired. Formerly: VP National Audubon; head lobbyist Sierra Club; President of Endangered Species Coalition

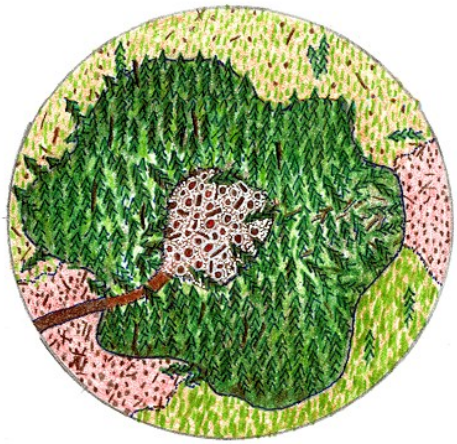
HOW TO REVIEW A TIMBER SALE

The official policy of the Forest Service and BLM is to encourage citizens involvement with their local forests and all timber sales so Forest Activists routinely can obtain the information shown below. In fact, various environmental laws specifically require citizens input and for agencies to . . . "make diligent efforts to involve the public," to "solicit appropriate information from the public," and "provide public notice of . . . the availability of environmental documents." Not only are Sale documentation and other written materials available under the Freedom of Information Act without any requirement that a citizen provide a reason why s/he wants it, agencies are required by law to help you learn all about what they do.

Paradoxically under environmental laws in general, agencies are not necessarily obliged to forego doing bad things, but they are obliged to document it when they do. So, agency files will often contain information useful in thwarting bad sales.

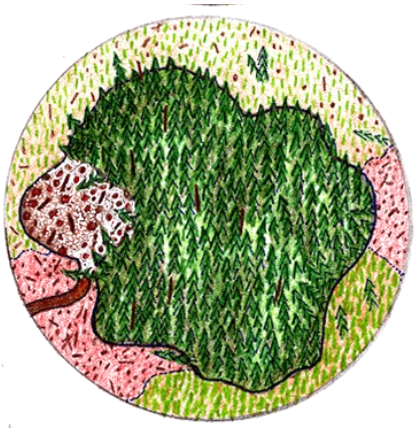
If any problem is encountered in obtaining information about timber sales, contact the conservation chair of your nearest Audubon Chapter or the Sierra Club.

1. **Sale History: What is the history of this sale and its individual units?**
   a. Was there a prior name for this sale or any units in it? Some sales contain units from old sales which never were sold. Many have litigation histories or were once withdrawn and are now being re-offered. Don't reinvent the wheel. New sale proposals sometimes contain units from old Forest plans and in early stages may contain proposed units are which are no longer viable. What units do the sale planners think are probably not viable, or problematical?
2. **Fragmentation impact:**
   a Do any of the units fragment a block of Ancient forest larger than 300 acres?

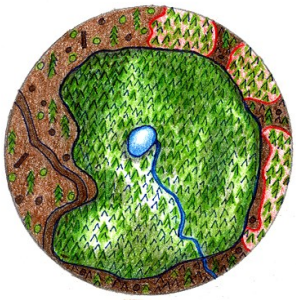


(2a-1) Poor Fragmentation

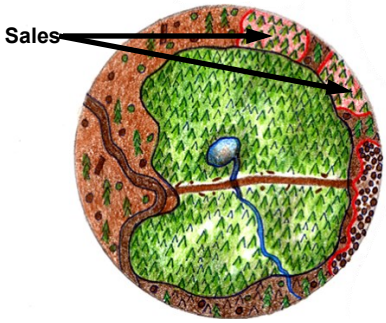
In the picture above, the units to be logged fragment an entire block of forest. However, in the picture below the units to be logged are on the edge of the forest block, leaving the majority of the block intact.



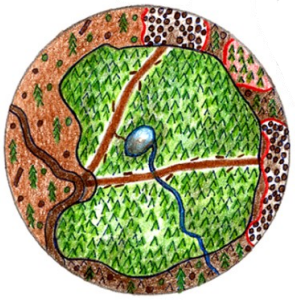
(2a-2) No Fragmentation



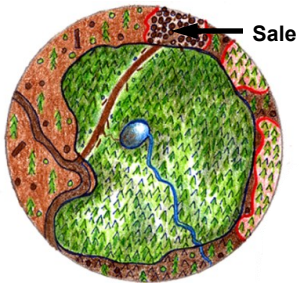
(2b-1) Unfragmented 5000 acre roadless area.



(2b-3) Road cut through 5000 acre area dissects it.



(2b-4) Two roads from past sales fragment area.



(2b-2) Road cut to proposed sale area

Fragmentation can change not only the present state of a forest block but its future. Figure 2b-1 shows an unfragmented 5000 acre roadless area with adjacent clearcuts. Such a block is a candidate for a future wilderness. Figure 2b-2 shows the same 5000 acres with a road cut through the northwest corner to reach a proposed sale. The forest block is fragmented. Figure 2b-3 is the same block bisected into two 2500 acre halves. The road may prevent the block from being designated as a wilderness. In Figure 2b-4, multiple roads from past sales may subject the whole area to wind, edge effects, and blowdown, as well as loss of future wilderness.

2. Fragmentation Impact *continued*

b. Is the sale or its units in or adjacent to a roadless area? There are at least four separate legal types of unroaded or "roadless" areas and different rules for each.

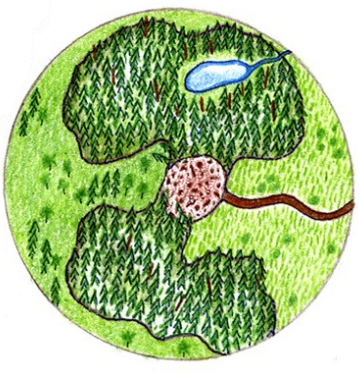
3. Corridors and Connectors Impact :

a. Are any units placed in biological connectors?

b. Is the sale between large preserves such as wilderness or roadless areas?
Look at aerial photographs (always available) to see the physical context of the immediate area. These photos may also show obvious previous clearcuts close to the planned sale, which, if significant enough, should require the agency to address the cumulative

(3a-1) Biological corridor intact

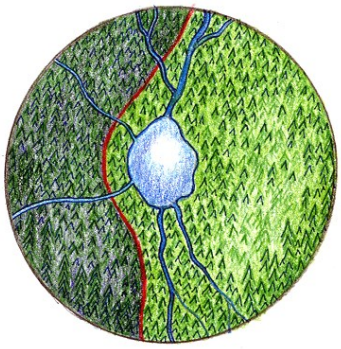
On the left two units of forest are connected by a biological corridor. To the right the proposed "cherry stem" sale removes the corridor, reducing the genetic diversity of many species now separated in two islands of forest.



(3a-2) Biological corridor severed

(4a thru c-1) A clean stream with wild fish before logging

(4a thru c-2) The same stream after logging, with sedimentation, no fish, and reduced stream flow in summer



(4d-1) A municipally owned watershed providing clean water to a town

The accompanying illustrations show some of the impacts to watersheds from poorly conceived timber sales.

impacts of logging in the watershed. Examine larger scale maps to see the landscape and regional impacts.

4. Watershed Impacts:

What watershed is the sale in? What creek does it drain into?

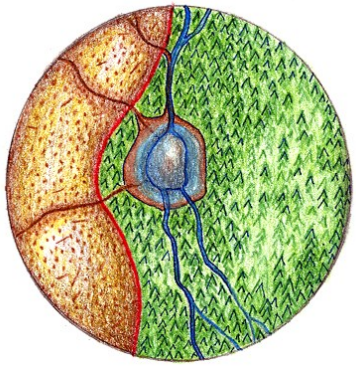
a. Is there a wild fish problem with the creek or in the river that the creek drains into?

b. Does the sale raise stream temperature?

c. Is there a sedimentation impact?

d. Are the affected streams on your state's list of degraded waters (the "303(d) list" required to be prepared every two years under the Clean Water Act)?

e. Is the sale in a municipal watershed that provides a local community with its drinking water?



(4d-2) The same water municipal water source after logging. The water now contains sediment from the nearby denuded slopes after clear-cut. The municipality may have to spend a good deal of money to test and treat the water from the contaminated source.

(5 & 6-1) Directional Aspect and elevation

5. Elevation:

Generally the higher the sale, the worse it is.

a High elevation sales can raise reforestation issues. Are there proven reforestation failures nearby?

South facing and steep slopes and poor soil conditions often cannot be reforested leaving permanently denuded scars and erosion-prone areas.

6. Directional aspect:

South facing slopes are hotter and don't regrow trees as well as north facing slopes do. If the sale is high enough and southerly enough you may be able to show from prior sales that the trees to be cut cannot possibly grow back. Existing trees on a slope may be there only because the forest had a thousand years to establish them, but if you cut them, none will ever grow back in your lifetime.

6. Area/volume relationship of the cutting units:

a Big volumes from few acres mean large trees are involved. 3 million board feet on 700 acres is one thing; 10 million board feet on 60 acres is quite another.

b But be alert to "small sales" which in the total context of other planned or previous sales will have a big impact.

8. Special designations:

a. Is the sale in a special designation like a Key watershed or late successional reserve or some biological overlay? If so, distinguished biologists may have already decided already that the area is important to avoid.

b. Is the sale in critical habitat unit for a species listed under the ESA?

c. Have unreforestable areas been withdrawn from sale units?

d. Have potentially unstable areas been withdrawn from sale units?

9. Slope and soil condition:

a Is the sale on steep, gravelly or easily erodeable ground? The steeper and more unstable the slope the worse the sale. If you create bare ground on a steep slope the next rains are going to pour sediment into the stream at the bottom.

b. If tractor or ground based yarding techniques are envisioned does the sale violate soil compaction standards?

10. Stream Proximity:

What class (size) are nearby or adjacent streams? What buffers are provided? Are they minimum size buffers? Are the agency standards for stream buffers being observed.

(10 & 11-1) Stream proximity effects and road crossing stream

a. Some streams have been given a special designation as "water quality limited" under sec. 303(d) of the Clean Water Act.

11. Road Building:

How many miles of new roads and reconstructed roads are involved. The more the new roads the worse the sale. Large numbers of miles can indicate money losing sales, or an attempt to open other areas to future entry. Because of

In this illustration, a clearcut has an inadequate stream buffer to protect from runoff. If the stream has been declared as "water quality limited" stream water under sec. 303 (d) of the Clean Water Act, you may have a case. A new road into the clearcut area requires an adequate culvert.

the“edge effects” of wind, drying out, and the fact that different species inhabit the edge of forests, as much as several hundred feet into an intact block of old growth can lose its old growth character when a road is put in. Some species don't take well to roads when they exceed certain densities.

a. Do new roads involve stream crossings?

b. Do road plans include drainage upgrades on existing roads (i.e. culvert replacements) or decommissioning of segments that are a risk to aquatic values?

(12-1) Low soil class

This area is a low soil class. It is rocky with a low density of underbrush to hold soil in place. The area is a bad place to do a timber sale since reforestation will be difficult.

12. Soil Class:

Timber growing land is categorized by site class (how good it is for growing trees). What is the soil class for the units? Poor soil classes mean the trees will grow back slowly if at all so reforesting the units may be a problem.

13. Endangered plants or animal involvement:

What are the legal requirements for surveying for species, were they observed? Anything from a flower to a large animal can provide grounds for pulling or modifying a sale.

a. Some sensitive and indicator species are not on the ESA list or may be on a State list.

14. Proximity of Spotted Owls, Marbled Murrelets or Salmon:

These species have been well studied and sometimes have special rules, and zones or overlays of protection around them. Sometimes as in the case of Murrelets these can extend for as much as 50 miles.

15. What do agency “ologists,” particularly biologists say about the sale:

Biologists, geologist, and hydrologists often may have already tried and failed to stop the sale from the inside and are in the best position to advise on the sales' particular vulnerabilities. Ask them directly and privately about it. Generally they will not lie to your face. I am personally aware of at least 100 million board feet of clearcuts that were stopped because of responses to, or documents produced, by agency biologists to two simple questions, "What do you really think is wrong with this sale?", and "How would you go about stopping this sale?

a. See what FWS and/or NMFS and your state Fish & Wildlife department have to say about the sale. Don't hesitate to FOIA their comments if they are not readily available.

16. Sale Status:

Exactly where is the sale in the pipeline? Every sales goes through what can be years of regulatory process which can include: Scoping, EA preparation, draft EIS, Final EIS, ROD (Record of decision), with opportunities for involvement at each step.

17. Has an enviro group worked on this sale already:

Was an environmental organization involved earlier with this sale, or perhaps the Forest plan under which the sale is being prepared? Perhaps the Forest plan was appealed at some point. What issues were raised at earlier points? Usually there is someone someplace who has a file, or background on the area you are concerned about; i.e. American Fisheries, Wilderness society, Audubon mappers etc. Don't reinvent the wheel.

18. Proximity to other values:

Is the sale: near a community, campground; current or old hiking trail; nature preserve; Wild or Scenic River actual or proposed; on a road into a Wilderness area; if so, will the sale impact the area.

a. Is it near seasonal wild game areas?

19. Visual Impacts:

Can the sale be seen from a road, or a stream used by canoers and rafters". Does it have a visual impact. Forest plans have “Visual Quality objectives” as well as ecological ones.

20. Allies in other government agencies:

If the sale takes place in some city's watershed or on land adjacent to another agency like a National Park that entity may want to stop the sale too, or have information and resources like species surveys you can use.

21. Wind and Blow down:

Is the area subject to blow down. What has been the experience with past sales in the immediate area. Was prior reforestation successful? Openings in the interior of stands expose trees to blow down as trees inside stands are sometimes not as windfirm as trees on the edge of forests.

22. Standards and Guides:

Ask the specialists and Timber sale planner what "Standards and Guides" in the Forest Plan, if any, will be violated. There usually will be at least one these days.

23. Relative Importance to the Local ranger District:

What % of the yearly timber quota of the Ranger District or BLM resource area is represented by this sale. The higher the %, the more likely the sale has vulnerabilities and the bigger your problem is going to be.

24. How Big is the sale:

How many acres will the individual units clear cut. Do they violate the Forest Plan's Standards and Guides for unit size or spacing between proposed and recent clear cuts.

25. Other Agency Review:

Does the sale have to be reviewed by another Government agency such as the Fish and Wildlife Service? What do their specialists think. Bad sales often create frustrated anxious staff in other agencies who while helpless to stop things themselves will be delighted to tell you what they know.

26. Cutting prescriptions:

How are the units proposed to be cut (silvicultural prescriptions); seed tree, clear cut, shelterwood, group select, etc. Find out what this gobbledygook means. Ask to see pictures of what these things look like on the ground. The illustrations on page 10 help explain some of

the possible logging scenarios.

a. See whether the agency is going to have all the "leave trees" on the edges of the clearcuts. This obviously violates the spirit of the "leave tree" concept.

27. Variation between proposed and actual sale:

Is the paper description of the sale is the same as what they have laid out on the ground? Sometimes planners will lay out a sale different from what their files show. Trees over so many inches in diameter may be supposed to be saved but some may be marked for cutting anyway.

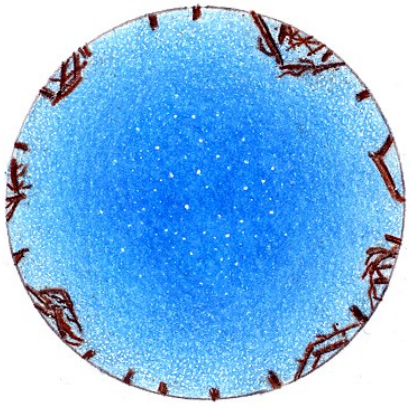
28. Pack the record with any documentation you have:

Any scientific or factual assertion should cite a document even if it's just giving the citation for a scientific article that the citizen is aware of. That at least gets it into the record and gives notice to the agency that the documentation exists. The number one problem in litigating NEPA cases is getting documents into the record after the record is closed.

(26-1) Distributed "Leave Trees"

(26a-1) "Leave Trees" all at edge of clearcut.

These illustrations show the difference in excuting the "leave tree" concept. Both clearcuts have the same number of "leave trees" but having all the "leave trees" at the edge violates the spirit of the "leave tree" concept.



(26) Clearcut with no "Leave Trees"

(26) Thinning to even age

(26) Uniform Next Rotation

(26) Uniform age group

(26) Clearcut with seed tree

(26) Thinning to even age group