PEER
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BUREAU OF LAND MISMANAGEMENT

Timber Sale Maladministration

Part Five of a
Comprehensive Study of the

Public Domain Forestry Program
of the
Bureau of Land Management

March 1997

About PEER

Public Employees for Environmental Responsibility (PEER) is an association of resource managers, scientists, biologists, law enforcement officials and other government professionals committed to upholding the public trust through responsible management of the nation's environment and natural resources.

PEER advocates sustainable management of public resources, promotes enforcement of environmental protection laws, and seeks to be a catalyst for supporting professional integrity and promoting environmental ethics in government agencies.

PEER provides public employees committed to ecologically responsible management with a credible voice for expressing their concerns.

PEER's objectives are to:

1. **Organize** a strong base of support among employees with local, state and federal resource management agencies;
2. **Inform** the administration, Congress, state officials, the media and the public about substantive issues of concern to PEER members;
3. **Defend** and strengthen the legal rights of public employees who speak out about issues of environmental management; and
4. **Monitor** land management and environmental protection agencies.

PEER recognizes the invaluable role that government employees play as defenders of the environment and stewards of our natural resources. PEER supports resource professionals who advocate environmental protection in a responsible, professional manner.

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About This Report

For the past year and a half, Public Employees for Environmental Responsibility (PEER) has studied the forestry and timber program of the U.S. Bureau of Land Management (BLM).

The BLM in the U.S. Department of Interior manages more land than the Forest Service, Park Service and the Fish & Wildlife Service combined. In fact, BLM manages 270,441,663 acres of land–about one-eighth of the country's entire land surface–mostly in the West. Despite its size, the BLM forestry program receives very little attention.

The Bureau of Land ***Mis****Management* exposes extensive maladministration of the agency's Public Domain forestry program resulting in widespread timber theft and contract fraud, sweetheart negotiated sales, one-sided land exchanges and routine failure to enforce post-sale conditions, all to the detriment of both the public lands and the public treasury.

This white paper is the fifth installment of a series of PEER reports. Like the other installments, *The Bureau of Land* ***Mis****Management* focuses on Public Domain lands, covering the five largest timber producing states - Idaho, Montana, Washington, Oregon and California- within the twelve state BLM Public Domain area. The BLM timber producing areas on the west side of Oregon and California (the so-called "O & C lands") are not covered by this report.

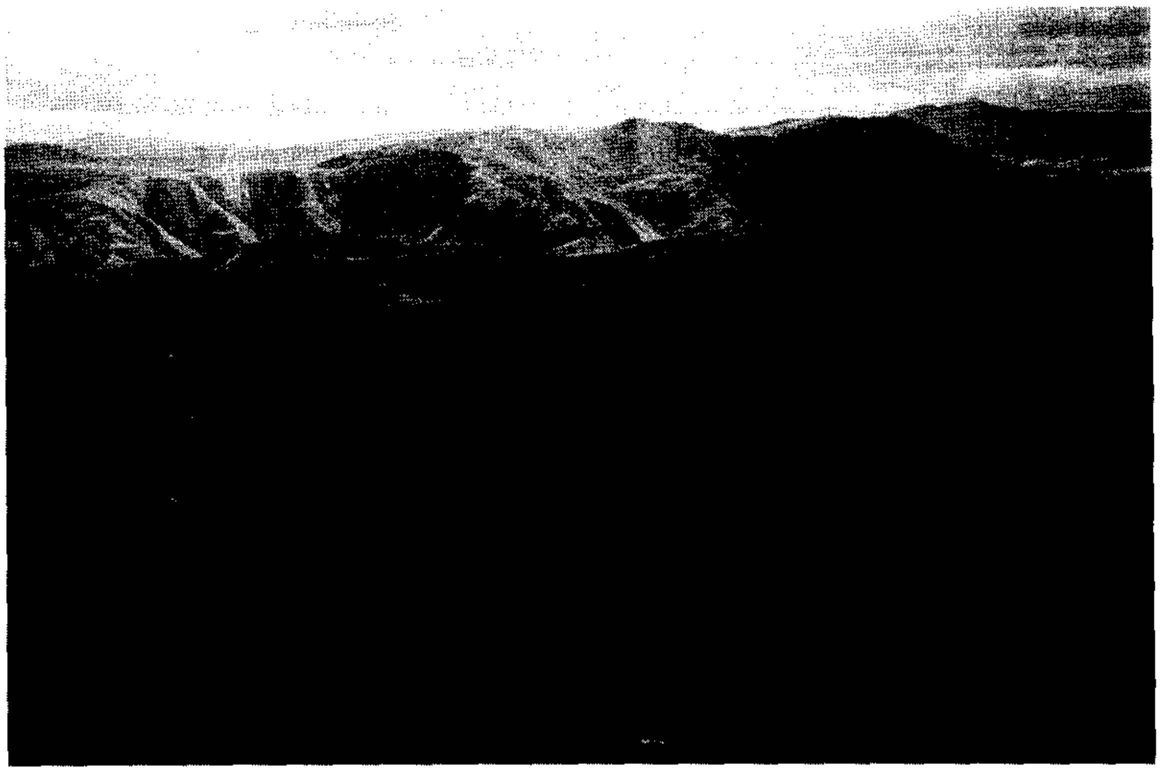
The purpose of PEER's study is to evaluate BLM's management practices and to determine whether, and to what extent, the agency's forestry program has been and is being conducted in accordance with the laws, regulations and policies governing these public lands.

The Bureau of Land ***Mis****Management* is the fifth of six reports. After the final report, PEER will release its entire study, the most comprehensive review of BLM Public Domain forestry ever undertaken.

PEER wishes to thank BLM staff members who assisted in our review of field sites and agency files for their valuable time, expertise and commitment to environmentally ethical resource management.

PEER's study of the BLM forestry program received the generous support of the Bullitt Foundation, the Educational Foundation of America, the Global Environment Project Institute, the Richard and Rhonda Goldman Fund, the Strong Foundation, the Janelia Foundation and the W. Alton Jones Foundation.

Jeff DeBonis
PEER Executive Director



BLM PUBLIC DOMAIN. Typical BLM Public Domain lands in eastern Oregon en route to Lookout Mountain.

I. Executive Summary

An investigation by Public Employees for Environmental Responsibility (PEER) reveals extensive mismanagement of the Bureau of Land Management's Public Domain forestry program. Through a combination of negligence commited by BLM and fraud perpetrated against the agency, as much as half of the timber harvested from Public Domain forest lands is removed without payment.

According to the report, "lump sum" estimation techniques allow timber purchasers to regularly take many more trees than the agreed upon amount. In some instances, PEER found purchasers taking **five times the contract volume** without additional payment. Similarly, PEER discovered that BLM disregards its own procedures for negotiated or no-bid sales to the detriment of the taxpayer.

Land exchanges with timber companies examined by PEER invariably showed the agency trading away forested acreage for cut over tracts. Meanwhile, consolidations with adjacent Forest Service lands languish despite clear administrative and financial savings for both agencies.

The report documents a pervasive reluctance by BLM timber managers to follow the agency's own policies and regulations, particularly those concerning sale preparation and administration combined with systematic non-compliance with reforestation requirements, stand prescriptions, environmental assessments and protection of non-timber resources and values.

Once a sale takes place, BLM acts as if the agency's responsibility is over. The consequence of the agency's indifference to post-sale treatment is severe, causing lasting environmental impacts, many of which cannot be mitigated for many decades, some for hundreds of years.

Over a year and a half period, PEER surveyed timber sales, inspected sites and reviewed records in BLM districts in five western states. Experienced BLM and Forest Service timber planners and silviculturists observed sales, photographed tracts, both before and after sales, combed agency files and interviewed knowledgeable employees on PEER's behalf.

This report on BLM timber sale administration is the fifth in a series by PEER focusing on the agency's forestry program. PEER's first report, *Phantom Forests*, showed that BLM forest inventories used as the basis for planning timber sales are outdated, inaccurate and incomplete despite agency policy to the contrary. The report also revealed the BLM has vastly exaggerated the success of reforestation efforts, counting barren tracts as fully restored.

The second PEER report, *Where Timber Beasts Rule the Earth*, detailed how the BLM is destroying fragile, transitional public domain forests through systematic over-cutting. This report exposed the agency's failure to harvest timber in a sustainable manner due to the practice of exceeding maximum allowable logging levels and relying on erroneous data.

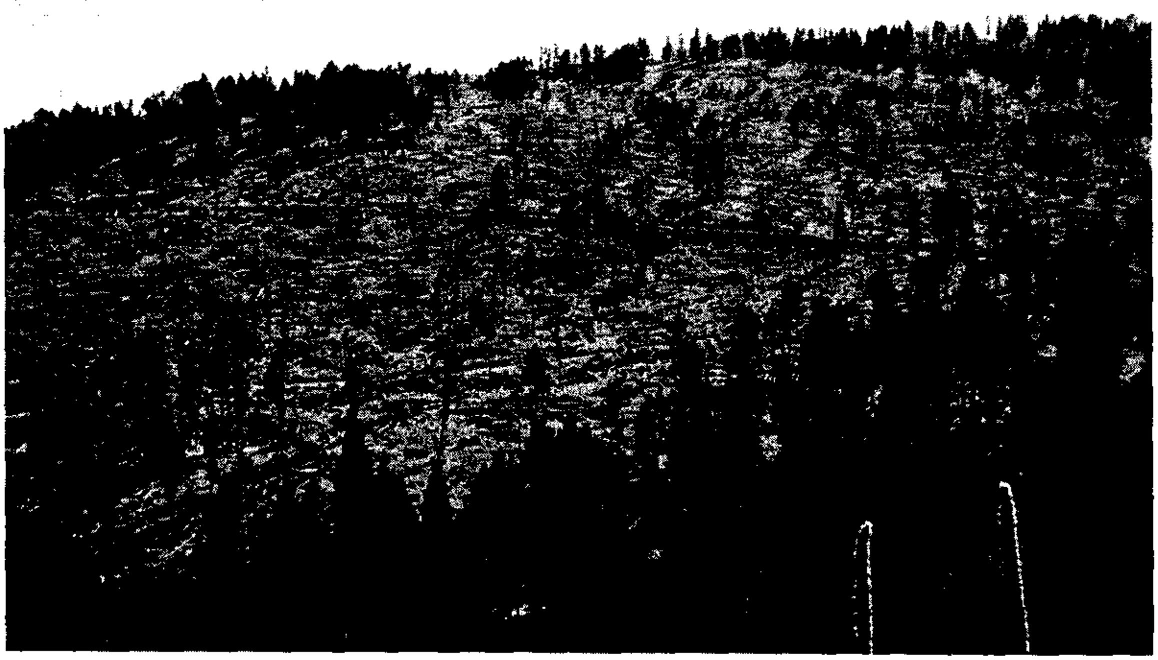
PEER's third report, *Savage Salvage*, documented the BLM's abuse of the "salvage rider," a temporary Congressional mandate to increase logging for the purposes of "forest health" and fire prevention. The report showed that, under the guise of forest health, BLM cut large quantities of "green" or healthy trees to the detriment of fragile and fragmented ecosystems. Further, the report showed how BLM forestry practices actually increased rather than reduced fire danger.

The fourth PEER report, *Never Mind NEPA*, confirmed that the agency routinely violates federal environmental statutes, particularly the National Environmental Policy Act (NEPA). This report identified many instances where the agency falsified records, conducted illegal timber sales and targeted old growth habitat for harvest while ignoring the advice of its own biologists and scientists from state and federal wildlife agencies.

The BLM in the Department of Interior manages more land than the Forest Service, Park Service and Fish & Wildlife Service combined. In fact, the BLM manages more than

270 million acres of land in the West. Despite its size, the BLM forestry program, covering all "Public Domain" lands receives very little attention. This PEER study is the first major review of the agency's timber practices in more than two decades.

PEER is a national organization of resource management employees dedicated to environmental ethics.



DIMINISHING RESOURCE. Overview of post-sale BLM land in Idaho. Grazing has stifled regeneration.

II. Giving It Away

BLM commercial forest land is typically composed of isolated and widely scattered pockets of timber. Often, these pockets lie behind private land, requiring extensive travel time to inspect. Much additional work is needed to negotiate and secure easements from adjacent landowners in order to facilitate timber operations.

In order to properly manage these far flung and diverse tracts for sustainable timber harvesting, experienced professional staff is required. Without adequate staff, timber sales cannot be administered in accordance with law and regulation.

No Cops on the Beat

The BLM manual requires state directors to "...ensure funding and manpower levels sufficient to accommodate the desired program or to adjust program levels [until they are] consistent with financial and human resources available." Despite that requirement, however, PEER found, almost without exception, that BLM districts are woefully understaffed to even minimally manage a timber program.

CHECKERBOARD LANDS. BLM lands in foreground abut private timber tracts with more BLM acreage in background.

No state director has reduced his/her timber program level to match staff levels. Several units have actually reduced the number of foresters by "zoning" or consolidating duties without concomitant reductions in projected timber yield. These consolidations have caused disruption of program continuity, loss of records and information, and a significant increase in travel time from the now-more-distant offices. Thus, a problem that required decentralization and additional personnel was "solved" by centralizing responsibility and reducing manpower.

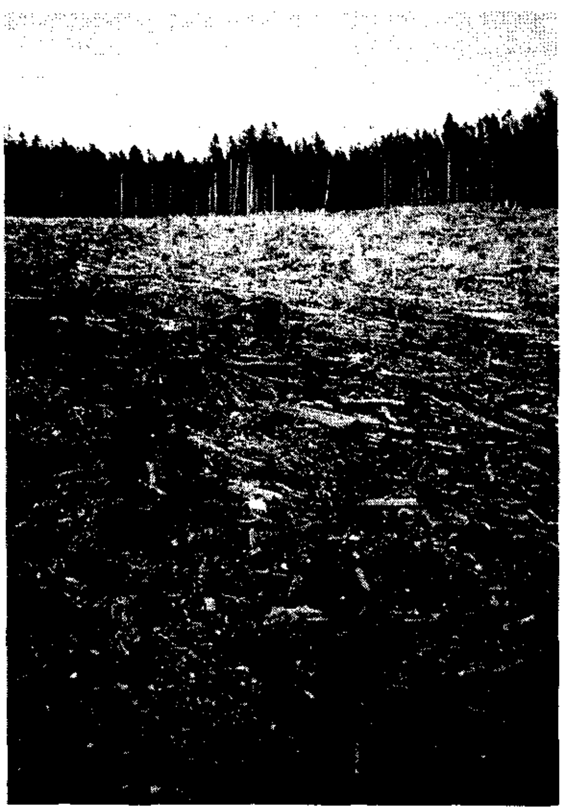
As a result of the failure to reduce the program to match available personnel, BLM Public Domain districts are not staffed to competently manage their timber programs. Not surprisingly, given the extensive travel and other time demands on the ever more limited staff, in many instances there is a profound absence of records to document operations. In those cases where there is nothing in the files, the proof lies on the ground.

Criticism of the agency's timber program has resulted in inadequate and generally belated hiring of additional foresters on some units, but not before poor sale design, shoddy sale administration, ineffective post-sale silvicultural treatments required the correction. Even in these limited instances the effect is short lived.

The district offices in Idaho and Montana are typical of the agency's manner of staffing the Public Domain forestry program:

Idaho

The Coeur d'Alene, Idaho, and Eastern Washington Districts once employed fourteen full-time foresters. Now only two work in each resource area. The Coeur d'Alene District has the largest timber program in the agency outside of western Oregon.



TIMBER ADMINISTRATION 101. Ground view of BLM Idaho clearcut as seen from valley floor.

The Salmon, Idaho, District once had several foresters and technicians; it now employs only one of each.

For many years, the timber program for three southeastern BLM districts was administered by foresters on each district. Only one forester from the Pocatello zone now administers the forestry programs for all three districts. This one forester is responsible for sale preparation and administration, supervision of seasonal employees, record keeping, silvicultural activities and contract administration for the entire southeastern Idaho area. This is an impossible task for one person, especially given the logistical requirements imposed by distance and travel time.

Montana

The commercial forest land on the Dillon Resource Area in Montana is widely scattered, requiring extended travel and time to manage. The unit's two foresters cannot adequately administer the unit's many small, scattered sales, resulting in strong internal and external criticism of the timber program. Sale folders for the Rocky Man, Alder Gulch, Trapper Creek, Spring Creek and Yank Swamp sales all contain correspondence and or memoranda indicating criticism by BLM staff officers, private individuals, Montana state officials and local conservation organizations.

For more than eighteen years, the Lewistown District's program was administered by the same forester. For a decade (1977-88), the District sold 102 percent of its Allowable Sale Quota (ASQ). Since the late 80s, the size of the district's timber sale program has fluctuated widely with ASQ attainment varying from 71 percent to 354 percent. The District's forestry program duties are now assigned to the fire control officer.

The Garnet, Montana, Resource Area appears to be the bright spot in the agency's timber sale efforts. Its seven full-time foresters do an excellent job in sale preparation and administration. Its professional silviculturists are generally successful in reforesting cut over sites within the agency-mandated 5-year period and are also successfully reforesting the accumulated backlog of nonstocked areas. Its successes contrast sharply with the failures of more poorly staffed units.

Timber Theft in Lump Sums

Strong sale administration is a cornerstone of good forest management. Without it, profit-motivated loggers and industry frequently negate even the best silvicultural prescriptions and treatment. The BLM is too seriously understaffed to adequately administer its sale program, to ensure compliance with the contract and to prevent theft. As a result, **some BLM employees claim that as much as half of the agency's timber is removed without payment.**

Sale volume estimates appear vastly underestimated on many BLM sales, which are generally sold as "lump-sum" sales that allow all timber

ROBBING THE RESERVE. BLM sign in southeast Idaho reads: "Boundary of Timber Reserve - No Cutting Authorized Beyond This Point." BLM has no records indicating who cut the trees within the reserve.

within a delineated area, even if it exceeds the volume estimated or sold, to be cut without additional payment. Several sales reviewed by PEER in southern Idaho yielded the same pattern found elsewhere–the volume actually cut appeared to be several times the amount sold.

Cut volume on the well stocked units of the North Leigh Creek sale on the Idaho Falls District, for instance, was estimated at 2.5 thousand board feet (MBF) per acre. The area was marked for partial cut. It was essentially clearcut, instead, removing an estimated 8-10 MBF/acre. In addition, the contractor appeared to have exceeded the boundaries of the sale and cut—but did not pay for—even more volume.

Both the Wolverine Canyon and Moonlite Mine sales also became essentially clearcuts, removing all or almost all large trees. Comparison of the sales' cut over stands with uncut adjacent stands indicates that the sale volumes were seriously underestimated.

The Sorensen/Skinner sale advertised a cut volume of 1.85 MBF per acre. Stand density and basal area estimates in adjacent, uncut stands, however, strongly indicate that the volume removed was closer to **five times that amount**. Again, however, the lump-sum sale process precluded recovery of any additional payment.

All of these sales were sold as partial cuts but were essentially clearcut by the logger. Experienced sale preparation foresters and cruisers assert that consistent volume errors of such magnitude are highly unlikely and are more likely deliberate underestimates or theft.

Theft appears to be widespread, and one of its main routes is via clearcutting stands originally marked as partial cuts. The agency's chronic under staffing and the isolated and scattered nature of its lands produces poor contract enforcement, which facilitates the theft.

Reserve trees on the Sand Hollow sale in southeastern Idaho were also marked to be left but were felled by the purchaser, a clear case of deliberate timber theft. Upon discovery, he was billed at double the normal stumpage rate.

As one BLM employee remarked, "As much timber is removed illegally as is sold."

Small, negotiated lump-sum sales also can encourage the agency to underestimate sale volume to ensure a sale's economic viability. This promotes a friendly, albeit questionable, relationship among the agency, the logger and the local community.

Eastern Idaho districts had a large number of contract defaults and fraud occurrences. The timber sale folders PEER reviewed were rife with evidence of default, fraudulent bonds, breach of contract, and contest of volume and payment requirements. For example, the Red Rocks sale was supposed to have been a 12 acre sale on an isolated 40 acre tract, but the entire 40 acres had been cleared of timber. Similarly, field inspection on the North Leigh Creek Sanitation sale showed cutting exceeding authorized boundaries. Evidence of similar discrepancies was found in the files for Shotgun #6, Shotgun #9 and Donut Hole #2 sales.

HIGHGRADING ILLUSTRATED. Mature Douglas Fir taken under guise of mistletoe control project in Idaho's Salmon District.

In southeastern Idaho, for example, sales had commonly been "high-graded," with only four to five trees left per acre. High-grading is the removal of the most valuable and profitable timber while leaving behind the less profitable grades and species either as standing timber or knocked down slash.

III. Inside Jobs

Negotiated Sales

The agency disposes of timber chiefly by two means, competitive bidding and negotiation. Salvage sales and landlocked sales (sales isolated behind private land) are usually sold via the latter method, since private landowners know the sales' profitability and will not grant an easement or right-of-way to anyone else.

LANDLOCKED. Access to Public Domain land is often blocked by private holdings. BLM rarely obtains easements for public access.

With access to BLM lands isolated behind private land thus controlled by the private landowner—ranchers, timber industry and local residents—they can prevent anyone else's purchase of the public timber and guarantee their exclusive use of public lands. Such areas are extensive in all western states, and public easements across these private lands are heatedly disputed by the owners.

This landowner lock on access precludes bidding competition, but because the agency needs to sell such sales to meet its ASQ, sale prices are usually negotiated with the landowner at bargain-basement prices, much lower than those received for advertised sales.

PEER found such access to nearly all public lands in the Rudio Mountain area in Oregon blocked. Public lands there are surrounded by large ranch and private timber company land. The BLM does not have public easements to cross these lands. An identical situation exists in every western state, where hundreds of thousands of acres of public lands lie behind private gates.

Negotiated sales are limited to a maximum volume of 250 MBF and require written justification to be exceeded. PEER frequently found negotiated sales, however, that exceeded this volume and only infrequently found adequate written justification. In addition, the volume determinations for many non-adver-

NUCRAG SALE AFTERMATH. No environmental analysis was done prior to this negotiated sale.

tised sales appeared questionable and generally favored the purchaser.

The Nucrag sale in Idaho, for example, was a negotiated 300 MBF sale awarded to the adjoining landowner and given a categorical National Environmental Policy Act (NEPA) exclusion. Another sale in southern Idaho began as a 200 MBF sale on 70 acres but ended up a 1,100 MBF sale on 300 acres–nearly six times the original volume, more than four times the original area and nine times the EA's maximum limit. Still another sale in the same district also began as a small sale on a single cutting unit but grew in negotiation to five cutting units covering 328 acres, all without NEPA analysis or documentation.

In Montana's Lewistown District negotiated sales routinely exceed the 75 MBF limit set by their own programmatic EA and several have exceeded the 250 MBF maximum volume for negotiated sales.

Without public notice, negotiated sales are often completed and cut before the public becomes aware of them. This stealth quality of negotiated sales is precisely why there are supposed to be strict size limits.

BAD DEAL. Livestock trampling and off-road-vehicle use has devastated much of this negotiated sale area in Idaho's Blackfoot Mountains.

Land Exchanges

The agency's aggressive land exchange program is supposed to be aimed at consolidating its ownership and securing lands with high recreation and cultural values. The land BLM receives in exchange, however, is generally cut over land that need expensive rehabilitation and reforestation. Almost invariably, the land being traded away is its highest-value commercial forest land, stocked with heavy volumes of extremely valuable and immediately profitable old growth.

Much of those exchanged lands have already been or soon will be logged, maximizing short-term profit for industry and creating thousands of additional acres of cut over, nonstocked lands.

In 1992, the agency lost 17,625 acres of productive commercial forest land in northern Idaho to Potlatch Corporation, which offered in exchange 1,170 acres of recreation land in Idaho and 41,000 acres of timber-less Arkansas bottom land. Much of the traded-away Idaho BLM land was comprised of islands of standing sawtimber surrounded by industry clearcut lands. The value of the traded-away lands for recreation, watershed and wildlife values was not considered.

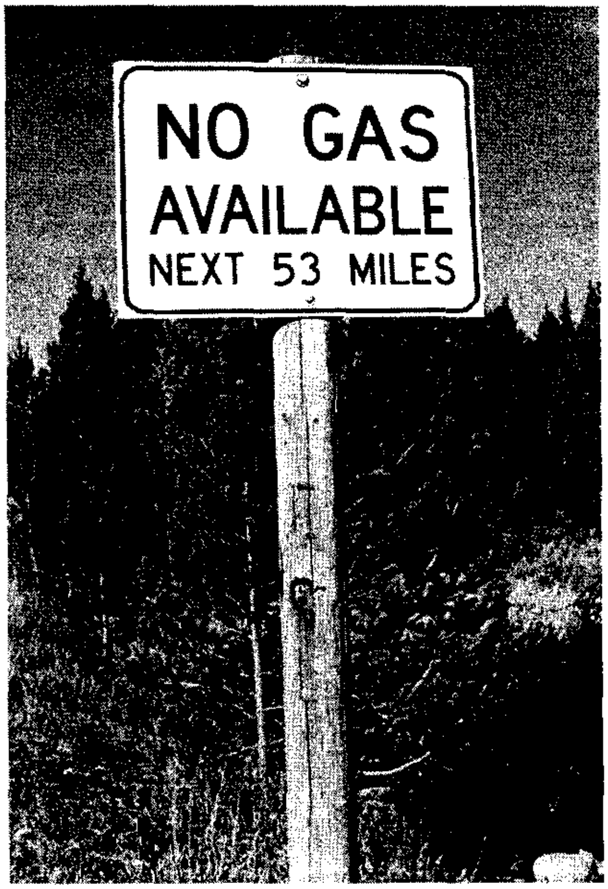
One BLM staff person commented that "BLM management didn't understand or realize the importance [of the lands]. From a cumulative effects standpoint, those lands were islands of habitat or strategic cores surrounded by heavily cut-over lands." Another said, "We lost the old growth and were left with high-elevation stuff. If Potlatch didn't select it, it didn't have current timber value. We exchanged out lands without regard for their preservation for public enjoyment."

The agency lost much of the land upon which its sustained yield forestry program was based. No public notice of the exchange occurred, nor was it subjected to the analysis required under NEPA.

BLM foresters complained of this same problem on the Garnet Resource Area in Montana, the Susanville District in California, the Spokane District in Washington and the Coeur d'Alene District in Idaho. In Oregon, the BLM exchanged heavily forested lands to Louisiana-Pacific for lands with recreational value along the John Day and Grande Ronde rivers. The Eagle Lake Resource Area in California traded 1,000 acres of some of its best timber land for lands along a recreation trail near Susanville.

The agency's scattered lands lend themselves well to consolidation with other land-management agencies, principally the Forest Service. Many BLM lands lie adjacent to Forest Service lands and only minutes from a Forest Service office. Forested BLM lands near Island Park in southeast Idaho, for instance, are a four-plus-hour drive from the agency's Idaho Falls office but are only minutes from a Forest Service office. Similarly, Pocatello BLM foresters must drive for three hours to reach sales only minutes away from the Forest Service's Teton Basin Ranger District. In northern Idaho, Cottonwood Resource Area people must travel seventy miles to reach sales only thirty seconds from the Forest Service's Elk City Ranger District.

By contrast with private land exchanges, BLM public agency consolidations are infrequent and glacially slow. Consolidation plans have been complete for more than a decade, but attempts at implementation have failed. The proposed consolidations would have eliminated much duplication of effort, time and expense. BLM foresters must thus continue to work many hundreds of extra hours and unnecessarily drive many thousands of extra miles, exacerbating the staffing and funding problems the agency faces every year.



LONG HAUL. It is a long way between BLM timber sale sites. Sign is on the Yale-Kilgore road in southeastern Idaho.

IV. Leaving It On The Ground

PEER found that what is planned in a sale contract and what actually happens on the ground are quite different, particularly in mitigating soil and watershed damage incurred by logging activities. This is often the result of the agency's failure to enforce the terms and conditions of the sale contracts.

CALLING CARD. Large pile of logging debris and useable wood left after BLM sale in southeastern Idaho. BLM cannot afford to go back and burn the piles and there is no access for private woodcutters.

One principal result of this failure is waste at the taxpayer's expense. In eastern Idaho's North Leigh Creek sale, for example, large volumes of usable wood were left in decks and piles on the site. The Big Canyon sale on Idaho's Burley District, originally justified on grounds of timber salvage and necessary reduction of fire hazard, did not require the purchaser to remove the standing dead timber, the very reason for the sale in the first place. This ensured that neither the salvage nor the fuel-reduction objectives would be met. The dead volume was later resold for "fuelwood" at very low fuelwood rates, though even then the purchaser cut only trees easily reached from the road. He then proceeded to resell the logs for houselogs at very high retail prices. The agency and the taxpayer received only the fuelwood stumpage rates.

Some sales are intended to protect forest health as well as the commercial values inherent therein. Salvage logging is often designed to control dwarf mistletoe, a disease that spreads from infected adjacent and overhead trees. Ironically, because of poor sale administration, infected trees of little commercial value to loggers are frequently left behind to infect new seedlings and saplings.

For example, mistletoe-infected and low-value cull trees were often left standing after "forest

UNCLEAR ON THE CONCEPT. Logging debris and slash left on BLM sale site defeat the purpose of reducing fuel buildup for fire prevention.

health" salvage sales in the Spokane District. This ensures that mistletoe will reoccur in the new stand and that, because cull trees are often genetically inferior, less desirable trees will propagate the new crop. It is a genetics lesson supposedly learned early in basic forester's training but one that is often ignored in the heat of "getting out the cut."

Three years after logging the Copper Mine sale on Washington's Spokane District, still-untreated logging slash remained a fire hazard and an eyesore. The agency had not done the required slash treatment work required in the original sale plan or in the contract. The slash was also blamed as the source of a beetle infestation in surrounding timber.

On the Dillon, Montana, Resource Area, the linkage between sale planning and administration is weak or absent. On its Yank Swamp sale, sale planners assumed that high log demand would ensure complete utilization of material and that there would be no need for tight utilization standards in the contract. The contractor, however, wasted so much material and left so much untreated slash that the BLM re-advertised the slash for salvage. There were no bidders, and the agency was left with the wasted material and an expensive slash treatment job.

Treatments Worse than the Disease

As a public land agency BLM is supposed to manage its assets for long term value over short term gain. For its forested lands, BLM is supposed to look to the period after the sale in order to prevent long term damage to the resource values, values such as future timber yield, wildlife habitat, clean water, etc., associated with the tracts that are being harvested.

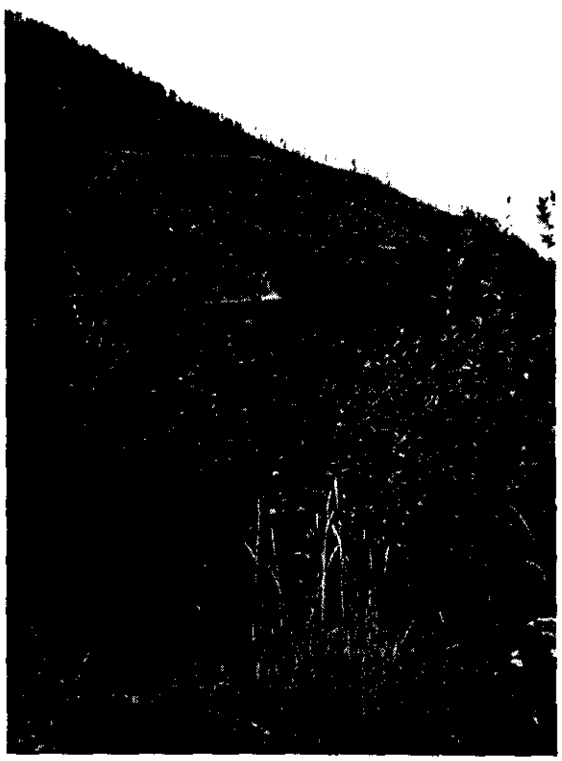
Detailed silvicultural "prescriptions" written by experienced silviculturists are crucial to the success of the forestry program. The agency's manual requires such prescriptions for all sales twenty acres or larger. PEER's review found that detailed prescriptions often did not exist for sales of this or any size. At best, some of the older sales contained only one and two sentence "Forester's Reports."

The Boundary Dam sale on the Spokane District prescribed snag and brush-pile retention for wildlife. The prescriptions, however, were not included in the sale contract or implemented after the sale. An internal inspection memo on the district's Tramway sale pointed out that "..we fell down...in part-time sale administration, which resulted in lots of 'oops' situations."

On the Garnet, Montana, Resource Area, roads that were supposed to have been closed immediately after the Rattler Relog sale for soil protection and stream sedimentation concerns were still open five years after the sale closed. No mitigation work had been done.

PEER also found that many of the timber sale environmental assessments (EAs) on California's Susanville District failed to identify specific contractual activities needed to link planning with post-sale mitigation efforts on the ground. Moreover, the mitigation activities themselves were often left undone.

While few silviculturists prescribe clearcutting south- and west-facing slopes at these latitudes, the Bradley Mountain, Moonlite Mine and Wolverine Canyon sales in Idaho demonstrate



SLIPPERY SLOPE. Clearcut inclines on BLM lands will never regrow

MOOOVE OVER. Native vegetation has been replaced by bluegrass sod due to heavy grazing of this Garnet District, Montana, timber site.

that the BLM has not consistently complied with this policy. All sales have unregenerated areas many years after sale closure.

The failure to implement post-sale silvicultural treatments, combined with cattle grazing and weed infestation, have rendered many sale sites non-stockable and non-productive. Even in some of the best cases stand structural integrity and habitat diversity have been destroyed.

PEER reviewers also found clearcutting and dominant-tree removal on meadow fringes and in transition areas. Timber management on such areas is not only economically marginal but also precludes regeneration and guarantees conversion of these key transitional areas into grasslands and brushfields.

Reforesting Until the Cows Come Home

BLM requires successful reforestation within five years. Because much of the agency's land is at hot and dry low elevations, survival of planted tree seedlings is poor, at best. Failures are much more common than successes, with two and three expensive replantings often necessary. Very frequently, cut over timber stands revert to long-term brushfields that cannot be regenerated even after employing near-heroic measures.

COWS CAN'T FISH. Cows congregate in riparian areas, trampling stream banks and destroying fish habitat in southeastern Idaho.

Most of the agency's land lies at low elevations adjacent to ranches, and cattle grazing is encouraged, even on lands allocated to intensive timber management and even though livestock trampling and grazing have long been known to damage and destroy conifer seedlings. This damage frequently necessitates two, three and, not infrequently, more replantings, with each planting costing $350 and more per acre. Grazing receipts, on the other hand, bring in only 7-15 cents per acre.

For example, PEER found extensive clearcutting, understory removal and conversion to single-species monocultures in dry southeastern Idaho. Cattle grazing and trampling there precluded conifer establishment and converted timber sites to grasslands and brushfields. Assurances by BLM employees that such conflicts are now being successfully resolved have proven untrue. PEER investigators found not only that cattle continue to graze traditional areas, regardless of BLM policy and the presence of small seedlings, but ranchers have even placed salt blocks in the plantations to draw cattle. The blocks remain, months after the agency was notified of their presence.

The Garnet Resource Area in Montana is working hard to reforest its nonstocked backlog, the result of 1970's-vintage clearcuts. Two and three hand plantings at $300 and more per acre required herbicide treatment to control the competing vegetation that had invaded the clearcuts. This vegetation comes in quickly on the agency's dry sites. Continuing to clearcut such sites perpetuates the problem.

WARNINGS IGNORED. Access road is blocked with debris following the Yank Swamp timber sale in Montana. This merchantable firewood has been left, creating a fire hazard and a wildlife movement barrier.

"Don't Worry, Be Happy"

PEER reviewers confirmed that timber sales often proceed without amendment in the face of threatened and endangered species concerns. In Montana, the agency ignored west-slope cutthroat and fluvial grayling problems associated with at least one of its sales. The sale would have gone on as the agency originally intended if public and state-agency complaints had not brought it up short.

Other sales in the area, Rocky Man and Yank Swamp, proceeded in spite of biologists' warnings and recommendations. The resultant impacts on wildlife were unacceptable but, because the sales had already been implemented, could not be mitigated. Sales in the Lewistown District routinely take place in critical grizzly bear habitat.

The list continues. A Spokane, Washington, timber sale EA cited the "...disturbance and modification of wildlife habitat..." that would result from sale activities, and that "...the proposed action is likely to decrease species diversity and richness...." Despite recognizing the concerns, the timber sale proceeded.

Another Spokane-area sale plan ignored or minimized the presence and importance of several Category II Federal Candidate (for rare, threatened and endangered classification) Species, initiating only an "abbreviated field inventory" to locate such species. Not only did all of the species exist in and use the area, an active bald eagle nest was found—belatedly—in the sale area.

The discovery of osprey, goshawk, great grey owl and black-banded woodpecker nests on or adjacent to units in The Rock timber sale on the Deschutes Resource Area, and numerous post-sale contract modifications for sales in California, Idaho and Montana illustrate that BLM's timber sale contracts are doing a poor job of coordinating timber management with other uses.

ONLY THE BARK IS LEFT. Massive wildlife disturbance by Spokane District clearcut leaves little habitat and a reflective canine.