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# ***PHANTOM FORESTS***

Part One of a  
Comprehensive Study of the

Forestry Program  
of the  
Bureau of Land Management

May 15, 1996

# 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 has carefully investigated the forestry and timber program of the U.S. Bureau of Land Management. BLM forestry receives less notice than the much larger program of the U.S. Forest Service, but the BLM program deserves considered attention. Many people think that BLM forestry is a troubled program. PEER is committed to looking for solutions to the badly managed forestry program of the BLM.

*Phantom Forests* is the first installment of a series on the Bureau of Land Management forestry program. After the final installment, PEER will release its entire report, the most comprehensive study of BLM forestry ever.

The purpose of this massive study was to evaluate the BLM forestry and timber sale program and to determine whether, and to what extent, these programs have been and are conducted in accordance with the laws, regulations and policy mandated for public domain lands. Additionally, PEER sought to discover what, if any, environmental problems might be associated with BLM's

current and previous timber management activities.

PEER studied BLM timber planning and management practices in 22 BLM resource areas and 12 districts in the five Western states where BLM has the most active forestry program: California, Idaho, Montana, Oregon and Washington. PEER reviewed resource management plans, BLM manuals and directives, memoranda, National Environmental Policy Act documents, timber sale records, and other timber-related materials.

On occasion, PEER received assistance with its field and office reviews from BLM staff members, and PEER wishes to thank them for their valuable time and expertise.

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

Jeff DeBonis  
PEER Executive Director

# BLM Forest Study: Part 1

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## I. Executive Summary

**A** year-and-a-half investigation by Public Employees for Environmental Responsibility (PEER) reveals that U.S. Bureau of Land Management (BLM) forest inventories used as the basis for planning timber sales throughout the western United States are hopelessly outdated, inaccurate or incomplete and in violation of Bureau policy. The PEER study further reveals that BLM has vastly exaggerated the success of reforestation efforts, a factor that further contorts agency timber harvest targets.

PEER, a national organization of resource-management employees dedicated to environmental ethics, surveyed and inspected BLM districts in five major timber producing states: Oregon, Washington, Idaho, California and Montana. BLM records, reforestation and timber sale sites were reviewed by a former BLM timber planner who is now a professional consultant. The PEER study is the first major review of BLM

timber practice in the last 20 years.

Based upon a review of their timber inventories, the Bureau of Land Management is misnamed. The BLM information base about the forests the agency supposedly manages is so bad as to border on pulp fiction.

The PEER study revealed that despite an agency policy that forest inventories be updated every 10 years, most of the BLM districts inventories were last updated in the 1960s and 70s and in some cases even those plans were based upon aerial photography taken in the 1950s. Some districts lack inventories altogether while others misclassify marginal, timber-producing areas as productive.



### Records Say It's a Forest

What was once a BLM forest in Southeastern Idaho is now a pasture. There are no records of this particular land being logged, and yet there are no trees. Heavy livestock use has prevented forest regeneration.

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BLM is, by law, supposed to practice sustainable forestry. For that reason, the basic BLM timber planning area is called a "Sustained Yield Unit." BLM's sustained yield unit is a misnomer. Because the agency's basic planning tool for designing and assessing timber sales is so inaccurate, the claim of sustainability is a falsehood.

Compounding BLM's timber planning problems is the failure of reforestation

efforts to replace harvested stands. Many of the surveyed districts reported healthy reforested tracts when, in fact, the reforested plantations had failed due to disease, insects or drought. BLM claims to be managing phantom forests that are reforested only on paper.

PEER's study on BLM timber inventories is the first in a six-part series of studies focusing on BLM's timber program.

## II. Pulp Fiction: Forest Inventories Seriously Lacking

**T**he U.S. Bureau of Land Management claims that its forest lands are harvested at sustainable levels and that its inventory systems prevent overcutting. However, PEER's review of selected BLM forests in Oregon, Montana and Idaho shows BLM's inventories are so woefully inadequate that overcutting is inevitable.

Making and keeping a reliable inventory is one of the fundamentals of sustainable forest management. PEER's research of BLM inventory and planning documents found that the agency's forest management planning is crippled by outdated and inaccurate forest inventories from the 1960s, 70s and early 80s that do not reflect recent changes in land tenure, reforestation trends, cutting rates, or environmental law.

Accurate forest planning depends on many factors, including (a) the number of acres

in the forest "land base," (b) the inventory of the species of trees, their size and growth rate, (c) the site conditions — soil types, nutrients, moisture, elevation and slope — and (d) environmental laws protecting wildlife, water and other non-commodity resources. This basic information helps managers plan how much can be cut from a certain area on a periodic basis.

BLM forest management planning is based on "extensive inventory" data originally collected years, sometimes decades, ago for large areas called "sustained yield



### "A Healthy Forest Stand"

Ten-15 years after timber harvesting, this timber sale in Southeastern Idaho has failed to regenerate. Heavy grazing has turned this area into a sagebrush grassland. Ironically, in the late 1970s, an environmental analysis document targeted this area for the "re-establishment of a health forest stand."

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units." SYUs are comprised of districts and resource areas. In recent years, BLM foresters have learned that applying SYU data assumptions to the smaller districts and resource areas is not necessarily valid. They have proposed the completion of new inventories, but the recommendations gather dust.

BLM policy requires reinventory every 10 years, but many times the policy is not followed. For example, current planning for the Dillon, Mont., Resource Area is based on "extensive" forest inventory completed in 1972. The Dillon manage-

ment recommended a new study in 1979 to be completed in fiscal year 1981. However, the study was never funded. Dillon has been operating its forest management program without an updated forest inventory for over 22 years, clearly in contradiction with BLM laws and policy.

PEER found other examples of outdated forest inventory. The inventory for the Spokane District in Washington relies on data from 1976 planning documents. The Salmon District, Idaho, uses data from 1975. The Lewistown District, Mont., updated its inventory last in 1974-75.



### III. Reforestation Failures: Phantom Forest Syndrome

**M**any BLM forest lands have serious restocking and regeneration problems. As a result, the BLM suffers from phantom forest syndrome: its trees exist everywhere — on paper, in computer models and in resource plans — but not on the ground.

BLM's inability to reforest areas within planned time periods affects projected yields, sustainability and economic returns for industry and government alike. Reforestation and restocking failures lead to overly optimistic sale projections, which results in overcutting.

Soil and site reforestation problems are often compounded by livestock trampling and weed infestation. Reforestation failures have resulted in brushfields where trees planted die from nutrient and moisture stress. Insects and disease also hamper reforestation.

The 1970 Frog Creek timber sale in the Dillion, Mont., Resource Area is an example of a reforestation debacle.

The 1970 sale comprised two clearcuts of 20 and 55 acres. In 1982, a survey of 50 regeneration plots showed only 11 with adequate stocking. A recommendation for artificial regeneration (planting) was made with the caveat that the harsh site could lead "to poor regeneration success," and lodgepole pine was planted soon thereafter. Douglas fir was planted on the same site in 1985. A 1992 survey of the site showed only 34 of the plots had any trees on them. The survey concluded, "[F]urther planting without live-stock control is not cost effective." Twenty-four years after logging, the Frog Creek sale area still remains deforested.



#### Regeneration Problems Persist

This part of the Garnet Resource Area in Montana was clearcut back in the 1970s, and it still has regeneration problems.

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Eastern Idaho has had reforestation problems resulting from insect damage, but that is not the whole story. The Chief Joseph Resource Area has repeatedly failed to regenerate its forests because of livestock grazing. Cows graze on all kinds of vegetation, including tree seedlings, and their manure leaves grass seeds in areas where seedlings struggle to survive against grass.

There is one area where BLM reforestation is succeeding. In the Garnet Resource Area, Mont., there has been a concentrated effort to reforest a part of the resource area. Garnet has received special appropriations for reforestation, and it has hired a full-time forester for this project alone. The latest technology has been used to establish successful plantations.

## IV. Cornerstone of Planning Ignored

The supposed cornerstone of BLM forest planning is the Timber Production Capability Classification (TPCC). According to the BLM Manual, the TPCC policy is

to classify land, and to define and delineate the relative suitability ... and the availability ... to produce timber on a sustained yield basis as a prerequisite to operations and extensive inventory application. Partitioning is site specific, based upon physical and biological characteristics and *not* economic or multiple-use consideration. [emphasis in original]

While the policy is clear and well defined, its application has been flawed. In all of the areas studied, PEER encountered significant problems with problem area identification. Lands classified as capable of sustained yield timber production under the TPCC process, and which were

incorporated into resource management plans as allocated for intensive timber production, may in practice be neither capable of nor suited to that purpose.

For example, the BLM Salmon District in Idaho does not have a TPCC inventory in the sense described by BLM policy requirements. There is much evidence to question whether all Salmon District areas planned for timber production are capable of sustained yield. A number of other TPCCs do not follow BLM guidelines.



**"Betsy"**

... the ubiquitous cow grazes in a BLM "forest" in the Garnet Resource Area, Mont. Livestock graze in many areas listed as forests, and grazing has turned many forest regeneration areas into grasslands.



## V. BLM Inventories Date Back Years, Decades

**P**EEER's analysis of the BLM timber program found, overall, that timber sale inventories are disorganized, decentralized and inconsistent. This is true from the state offices down to the resource areas. Staff cutbacks coupled with the continued, high demand for timber play a large role in this problem.

The following examples point to a general trend at BLM:

- Shoshone, Idaho Falls and Burley districts, Idaho — The minimal forest program staffing for the Eastern Idaho Sustained Yield Unit is reflected in its records. PEER found evidence that timber sale records had been lost, that reforestation and stocking surveys were unorganized and inconsistently maintained, and that inventories lack continuity. Poor inventories will profoundly impact the accuracy of future planning efforts and likely continue to lead to overcutting.
- Salmon District, Idaho — Records of silvicultural activities here are incomplete or missing, and sale history records are suspect. One NEPA (National Environmental Policy Act) document states that in "fiscal year 1983, the Salmon District sold three timber sales totaling 3,067 thousand board feet"; however, the sale records only document two sales totaling 2,725 thousand board feet.



### Typical BLM Filing System

Forest inventory records for an entire resource area dating back to 1964 are kept in this drawer. This is the Baker City Resource Area, Ore.

- Lewistown District, Mont. — A BLM internal audit found that many materials could not be located readily without asking individual program specialists and that some documents could not be located at all because those who were supposed to know where to look were out

Unit	Staff	Acres of Commercial Forest Land	Allowable Sales Quantity* in thousand board feet per year	Average Annual Cut** (thousand board feet per year)
E. Idaho SYU: Shoshone, Idaho Falls, Burley and Salmon districts	Entire SYU managed by one forester and one technician. One forester added to supervise salvage logging for entire SYU. Salmon District has one forester and one technician. Before 1988, each district had its own forester.	174,933	3,800	1,600
Coeur D'Alene District, Idaho	Two full-time foresters where there were once 14. One of the two serves the entire state.	68,382	12,400	9,300
Salmon District, Idaho	One forester and one technician. Major cutback in mid-1980s.	100,504	18,500	17,057
Butte District, Mont.: Dillon and Garnet resource areas	One forester and one technician in Dillon. Seven full-time foresters in Garnet.	136,402	8,696	6,600
Lewistown District, Mont.	One fire control officer who took over for a retiring district forester in 1994.	106,631	950	1,100
Spokane District, Wash.	One forester, one technician and a number of temporaries.	51,757	3,980	3,300

\*Allowable Sales Quantities are calculated for a 10-year period. These figures are annualized.

\*\*Randal O'Toole, The Thoreau Institute