



BARK'S GUIDE TO GROUND-TRUTHING TIMBER SALES

Introduction

So you're interested in fighting to protect your public forests from logging?

One of the most effective tools for forest activists is to know what proposed logging plans look like on the ground. Don't worry if you have no experience doing this sort of thing; all you need is an inquisitive mind, an ability to observe and take notes, and an interest in and love for the forest.

Ground-truthing provides critical pieces of information to fight destructive logging of native forests by informing the Forest Service (FS) or Bureau of Land Management (BLM) when they are not following the law. Ground-truthing also provides images and information to inspire the public to join in supporting protection of specific places and opposing changes to policies that allow our public lands to be degraded for corporate profit. Perhaps most important, ground-truthing is also a motivating way to visit the forest you are working to protect.

Why Ground-Truth?

Knowledge is power. When we face agencies beholden to logging interests, we need to gather a lot of information in order to keep our wild forests standing.

Timber sale plans are written from the point of view of an agency that has already decided it wants to log an area. Therefore, the descriptions of the sale area will read as if there is an urgent need to log. Ground-truthing will reveal to you the true characteristics of the area. When we ground-truth, we always find information that is not included in the sale plan or that is inconsistent with the sale plan.

Also, a big part of ground-truthing is being a witness to the destructive practices of the FS and BLM. We need to let them know they are being watched closely.

Finding Out About Timber Sales

1. Join the Bark email alert list by emailing info@bark-out.org. We will send you notices of upcoming sales on Mt. Hood National Forest and nearby BLM land, with brief summaries and suggested comments. A tremendous amount of information about dozens of timber sales is available on line at www.bark-out.org.
2. Get on the quarterly timber sale update mailing list for the Mt. Hood National Forest and/or the Salem BLM. This document provides status updates and brief descriptions of just about everything the FS and BLM are up to. Request to receive *Sprouts* from the Mt. Hood National Forest Supervisor's office (503) 668-1700 and *Quarterly Update* from the Salem BLM headquarters (503) 375-5646.
3. There are going to be far too many sales that call for aggressive logging of wild forests for you to cover them all. Pick one project or a few projects that you are really concerned about. Coordinate with Bark volunteers and staff to work together to get out in the woods and make sure all information that you and others collect gets back to Bark.

So You've Identified A Sale You Want To Monitor - What Next?

1. Call the ranger district and ask for the best maps of the sale that they have or get them from Bark's website at www.bark-out.org.
2. Make sure to also pick up a district map (1 inch per mile map with topography lines). Timber sale maps combined with the district map enable you to get familiar with the road system, trails (off-road vehicle, foot, horse, and mountain bike), streams, and ages of different patches of forest in the area. Even if the timber sale maps are very general, you can familiarize yourself with what the area looks like. If possible, get the sale unit maps, which are usually more

detailed than the maps in the planning documents. The unit maps will show you all the details you need for ground-truthing: the units that are planned for logging, new and rebuilt roads, and affected streams.

2. Get out as soon as possible: the earlier in the planning process, the better. And get out in all the seasons. Different characteristics will catch your attention at different times of year.
3. Start with a general view of the area to help you determine which units to focus on. Start by studying every map of the area you can get your hands on, then spend a day driving, biking or hiking the sale area (biking works particularly well at this stage).
4. Rarely will you be able to walk every unit, so you must prioritize - focus on the most egregious logging practices—clearcutting, road construction, logging in old growth forests, cutting near streams, logging steep or unstable slopes and logging that affects trails. This information is revealed in the planning area maps.
5. Document what you see. Take good notes about what you see and make sure to describe specific locations well enough so others can find anything of especially critical interest. Take photographs or video and take notes for each picture indicating what unit you are in! Make sure to share what you find with Bark. It could be critical information.

Phases Of Public Participation In Forest Service Timber Sales – The National Environmental Policy Act (NEPA)

NEPA is a set of laws that requires the public be informed of environmental impacts of projects and allows public feedback. In order to be an effective ground-truther, you should be familiar with the process that the FS and BLM use to ask the public what they think about a timber sale. As projects move through each step in the process, the agencies provide more specific information and become more and more invested in implementing their proposed course of action. The Scoping and Comment period are the most important time to ground-truth and share any information you collect with the responsible agency and other forest defenders. However, ANY TIME IS A GOOD TIME TO GROUND-TRUTH. There are always ways to use the information you collect outside of the traditional NEPA process to push for forest protection.

Phase 1 - Scoping. This is a general call for comments on a proposed timber sale area. The plans are often very vague at this stage—usually, there will only be general maps of the sale area with large blocks of forests being considered for logging. Although this is the best time to share your concerns and questions with the agencies (because they have not invested many resources into planning the project), it can also be the most difficult time to ground-truth because so little information is available. The good news is that while the official scoping period may only last 30 or 45 days, this period can last years unofficially as they prepare a draft Environmental Assessment (EA) or Environmental Impact Statement (EIS). If you keep in touch with the agency person in charge of planning the project, you can frequently get detailed and accurate maps before they are available in the EA or EIS.

Phase 2 - Comments. Eventually (sometimes over a year later) the agency will produce a draft EA or EIS, with the EIS having more analysis about the impacts of the project. You have either 30 days (for an EA) or 45 days (for an EIS) to comment. These documents will describe if the project is a thinning or a clearcut; if new roads are going to be built; if they are going to use tractors, cables or helicopters to move the felled trees to a landing to be loaded on trucks, etc. These documents lay out the agency's justification for logging the project, and provide descriptions of the current conditions of each unit. When groundtruthing, look for inconsistencies between the way the agency describes the stands proposed for logging and what is on the ground, as well as problems with the agency's reasons for logging and what you see on the ground.

Phase 3 - Appeal. If the Forest Service decides to go ahead with the sale despite your well-written comments (which they nearly always do), they put out a decision notice with their final EA or EIS. Appeals must be made within 45 days of the formal decision date. You can only appeal, however, if you commented on the sale at some earlier stage. The appeal is a fairly formal document, and must contain specific information and be formatted in a specific manner. If you get to this stage, contact Bark or another environmental group to get a copy of an appeal to use as a template. Appeals are made to the agency themselves, so in effect you have one person in an agency deciding if another person in the same agency screwed up. Needless to say, appeals are tough to win. At this stage, ground-truthing should be focused on finding very specific details that can strengthen legal claims against implementing the project.

Phase 4 - Lawsuit. The next step is the lawsuit, which are almost always filed by organizations, not individuals. But all the work done by volunteers, such as photographing and documenting a sale, can be a powerful part of the record to convince a judge that the agencies have violated the law.

NOTE: There are some differences between the BLM and the FS process. For the FS, comments and appeals will be accepted if they are post-marked on or before the final day of the comment or appeal period. But for the BLM, a signed copy of your correspondence must be received on the day that it is due. They also do not accept emailed documents. In addition, the BLM has an additional process between the comments on the EA/EIS and the appeal called a protest. In the protest, you must identify the issues that you will raise in your appeal. For the BLM, you cannot submit a protest or an appeal by fax and every organization or individual must sign the document.

Just to complicate things even further, the Bush Administration granted the FS and the BLM the ability to circumvent all process above for some projects billed as fuel reduction, salvage, or forest health, as well as for small logging operations that they do not feel are significant. These projects are “categorically excluded” from NEPA and are difficult to track and provide comments on. If you are interested in monitoring these projects, you can contact the district offices and ask to receive information on all projects using the categorical exclusion authorities that involve tree cutting.

After The Public Participation Stage

1. Before the sale is auctioned, the agency publishes a “Prospectus”. The prospectus will provide specific information on the sale to logging companies that may want to bid on the sale. It is good to get a copy of this prospectus. You can get on the prospectus mailing list by calling the Supervisor’s Office and/or the ranger district. The prospectus will have maps that loggers will use—it is the final version of the sale, and contains the most accurate information about unit boundaries, road construction, and estimates on how much wood the logging operation will produce. Sometimes, there will be a fairly dramatic change from when the EA or EIS was produced. Any significant changes can be used to challenge the project.
2. A note about name changes. The Forest Service frequently divides projects analyzed in the EA/EIS phase into several sales offered to logging companies. This can make the sales hard to track. For instance, the well-known Eagle sale comes from the Eagle EIS. However, the Eagle EIS was actually divided into four sales: Eagle, Beagle, Talon and Claw. To track what started out as the Eagle EIS area, you would need to get the prospectuses on all four sales.
3. If the logging actually starts, there is still ground-truthing to do. Go out to the sale while tree cutting is actually in progress, but go on a weekend when the logging company will likely not be at work. Walk around and confirm that the logging company is taking only the trees they were supposed to take and that they are not encroaching on any buffers. If you can’t get out to the sale while they are logging, go as soon as possible after they stop.
4. Look at the stumps. If the sale was marked for leave trees (meaning trees to be cut were not marked), look for paint (usually orange) at the base of the stumps. If there is any, the trees were likely cut illegally. If the sale was marked for take trees (trees to be cut were marked), all the stumps should have a dot of paint (usually blue) at the base. If they don’t, they were likely cut illegally. Also, boundary trees (trees with the boundary marker tags) should not be cut.
5. Bring the EA with you and compare what they said they were going to do with what they actually did. If the two are vastly different, inform Bark -and the world.
6. **If you find anything amiss, take photos and/or video.** You must be able to document the trees that were illegally cut. Note their exact location. If just a few trees are illegally cut, call Forest Service law enforcement. We have received surprisingly good response in the past. If you find a gross violation, it can be fodder for the media and a lawsuit.
7. Visit the sale area again, well after the logging is complete. Check to see if road closures and other follow-up projects promised in the planning documents were actually completed.

What To Look For In The Timber Sale Area

1. **Use the Bark Survey Sheet.** Our goal is to have a survey sheet filled out on every unit of every sale.
2. **General Characteristics:** Look for and note by unit number as many of the following characteristics as possible. Don’t worry if you can’t get everything listed below, just get as much as you can.
 - Types, ages and sizes of trees - include overstory and understory trees. Measure approximate d.b.h. (diameter at breast height =4_ feet from the ground on the upward slope).
 - Amount, size (diameter and approximate height) and age of downed trees and snags. Look for critter holes.
 - Any distinctive vegetation. Even if you can’t identify something, note its existence - for example, “lots of mushrooms” as opposed to “lots of *Ramaria stunzii*.”
 - Elevation.

- Slope- steep? Flat?
- Aspect - which direction the slope is facing. (N,S,E,W)
- Signs of past tree cutting and regrowth within cut areas.
- Blowdown and potential for blowdown - especially prevalent along edges of clearcuts, on ridge tops.
- Signs of fire. (Blackened Trees)
- Roads in the area, and their condition and use. Are they gated or otherwise closed? Are they being used even though closed? Are they in poor condition? Are culverts plugged? Pay special attention to proposed new road construction, noticing what type of slope the road is proposed to traverse and what kind of forest will be impacted.
- Signs of landslides.
- Wildlife, wildlife habitat and animal prints.
- Soil conditions - dry, wet, rocky, etc.
- Recreation resources - trails, campgrounds, etc.

3. **Riparian Areas:** These are streams, lakes and wet areas - anywhere there is water.

- Identify them in advance on the maps, or look for signs such as devil's claw, skunk cabbage and cedars.
- Mark them on your unit map.
- If the sale area is already marked, measure from the sale boundary to the riparian area. (See the buffer widths listed below.)
- Look for fish or suitable fish habitat.
- Note the condition of streams - flow, clarity, sedimentation, woody debris, and pools.
- Note whether streams flow year-round or dry up in summer.

4. **Riparian Buffers:** These areas alongside bodies of water are no-cut or limited-cut areas under the Northwest Forest Plan. Note: buffer widths can be modified after a completed Watershed Analysis. Check the appropriate Watershed Analysis for details on this as well as any other management recommendations. Most Watershed Analysis documents are available on line at the BLM website: www.fs.fed.us/r6/mthood/publications

- Fish-bearing streams, lakes and natural ponds - the greater of 300 feet or the length of two site-potential trees (look for the biggest trees in the area and double their height), on each side of the stream, lake or pond.
- Permanent non-fishbearing streams and wetlands greater than 1 acre: the greater of 150 feet or one site-potential tree, on each side.
- Intermittent streams: the greater of 100 feet or one site-potential tree, on each side.
- Wetlands less than one acre: at least to the outer edges of the riparian vegetation.

5. **The Sale Markings:** At different stages of the sale, the project will be marked differently. Early in the process, you may see some flagging for unit boundaries, species surveys, stand exams (to see how much wood is in the trees), and other surveys. Usually, a clump of flagging will be placed on the road either where the unit begins or where good access is into the unit. All this flagging helps you to figure out if you are in the right place and can help you find boundaries, but boundaries often change.

After the sale has a decision notice and up until it is cut, the Forest Service will mark the hard boundaries of the sale. At this point, you should compare the maps found in the EA or EIS (and make sure to note if the units have been modified by the decision notice) with what is marked on the ground.

- Units always have boundary markers, plus markers within the units.
- Boundary markers always face into the unit, and usually state the name of the sale and the unit number. On Mt. Hood National Forest, they are usually blue. There are also usually blue flags and fluorescent orange markers on boundary trees.
- Individual trees within the units will also be marked with orange or blue paint. On some sales, the leave trees are marked, meaning the marked trees will not be cut (orange). On other sales, the trees to be cut are marked (blue). You can usually figure this out on your own if you have a copy of the Environmental Assessment or the timber sale Prospectus. Otherwise, you will have to call the Forest Service or BLM timber sale planner.
- Other markings can include riparian areas, future roads, and sensitive plants. Sometimes it is clear what the flags are for, while sometimes it is a mystery.

6. **Keep in mind;** the most important reason to ground-truth is to gain firsthand knowledge of the sale area. Any knowledge you gain of the sale area will help you make an impact.

7. **However, if you really want to thoroughly ground-truth timber sales, you must be willing to delve into all the NEPA paperwork associated with the sales.**

Document / Map / Equipment List

1. Phone and or email. Communication is absolutely essential. Let Bark know what sales you are interested in tracking and when you may go out to check these areas out. If you have any questions, call Bark and the agency responsible for developing the timber sale. The more people that call the FS and BLM, the more they know they are being watched.
2. Maps:
 - local National Forest map - available at outdoor stores, the local National Forest office, or the Forest Service map store at 800 NE Oregon, Portland, OR (503) 731-4444. Bark has them for sale at the office. Mt. Hood has also just released new district maps that are very good, also available at this map store.
 - Specific timber sale maps, as discussed above - from Bark's website, the Forest Service or BLM District Office.
3. Field Guides - any and all you can buy, borrow and carry - all available at Powell's. Not essential, but helpful.
 - Tree and Plant guides - Preferably Northwest specific. The key book is Plants of the Pacific Northwest Coast: Washington, Oregon, British Columbia, and Alaska, by Jim Pojar et al. Another useful one is Rare and Endangered Plants of Oregon, by Donald Eastman.
 - Mushroom guides - the large volume of the Audubon Society Field Guide to Mushrooms of N. America is a good start, but Mushrooms Demystified is better.
 - Wildlife guide - ones showing prints are most useful.
 - Bird guide.
3. Equipment: Along with the usual 10 essentials (see www.bark-out.org)
 - Camera
 - Video camera
 - Binoculars
 - Mountain bike
 - Pen and paper
 - Tape measure - if you buy one, get a 150 ft. tape
 - Flagging tape
 - Compass and/or GPS
4. A copy of the Record of Decision (ROD) / Standards and Guidelines, for the Northwest Forest Plan, April 1994 - from the Forest Service Pacific Northwest Region Office, 333 SW 1st, Portland, OR 97204, or your local National Forest Supervisor's or BLM District Office. Bark has a reference copy in the office.
5. A copy of the Land and Resource Management Plan for you local National Forest or BLM District - from your local National Forest Supervisor's or BLM District Office. (Bark has a reference copy in the office)

Note: You must be comfortable with bushwhacking. Ground-truthing is definitely an off-trail adventure. If you are not experienced at off-trail hiking, map reading and route finding, be careful when you first start out. If you start by looking at sales that are already marked, you can always walk the boundaries of sales, thereby walking in complete circles. Also, be aware of hunting season and dress appropriately.

What To Do With The Information You Gather

1. Include your personal knowledge of the area in any contact or correspondence with the Forest Service or BLM. Even if all the formal public participation NEPA phases are completed, information should be passed along to the Forest Service or BLM.
2. Share the information with Bark. We can use it in appeals, lawsuits, press releases, etc.
3. Share the information with friends, family, acquaintances, politicians and the media. Part of the process of ground-truthing is to expose as many people as possible to what is happening in our public forests.

Keep In Contact

If you have questions, contact Bark or your local environmental group. Also, send copies of your letters to Bark or your local environmental group.

Keep us informed on how and what you are doing. We are here to help, advise and organize, but we believe at Bark that a network of individual activists confronting the Forest Service and BLM is highly effective.

Phone / Contact List & Hierarchy

Forest Service Pacific Northwest Region Office (Region 6)

333 SW 1st Ave.
PO Box 3623
Portland, OR 97208
(503) 808-2165

Mt. Hood National Forest Supervisor's Office

16400 Champion Way
Sandy, OR 97055
(503) 668-1700

Barlow Ranger District Office, Mt. Hood National Forest

PO Box 67
Dufur, OR 97021
(541) 467-2291

Clackamas Ranger District Office, Mt. Hood National Forest

595 NW Industrial Way
Estacada, OR 97023
(503) 630-6861

Hood River Ranger District Office, Mt. Hood National Forest

6780 Highway 35
Mt. Hood / Parkdale, OR 97041
(541) 352-6002

Zigzag Ranger District Office, Mt. Hood National Forest

70220 E. Hwy. 26
Zigzag, OR 97049
(503) 622-3191

Salem District Office, BLM

1717 Fabry Rd. SE
Salem, OR 97306
(503) 375-5646

Questions or comments, contact Bark at:

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Please feel free to copy and distribute this ground-truthing guide!