

**Forest Management and Stump-to-Forest Gate Chain-of-Custody  
Certification Case Study Evaluation Report for the:**

**Mt. Hood National Forest**

**Conducted under auspices of the SCS Forest Conservation Program  
SCS is an FSC Accredited Certification Body**

**Submitted to:**

**USDA Forest Service  
Mt. Hood National Forest  
Supervisor's Office  
Sandy, Oregon, USA**

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**Date of Field Evaluation: September 18-22, 2006**

**Date of Report:  
November 27, 2006**

**By:**



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## Organization of the Report

In September 2006, SCS and NSF-ISR conducted a dual simulated certification evaluation of the Mt. Hood National Forest relative to the standards of the Forest Stewardship Council (FSC) and the Sustainable Forestry Initiative (SFI). This report contains the results of the FSC portion of the certification case study. It is important to note that *award of FSC certification was not a possible outcome of this evaluation, nor was the Forest Service seeking certification.*

This document is divided into two sections. Section A provides the public summary and background information required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section B contains more detailed results and information and is made available only to the client, who is free to make it publicly available if they choose to do so.

## **FOREWORD**

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by The Pinchot Institute for Conservation to conduct a simulated certification evaluation (pilot assessment) of the management of the Mt. Hood National Forest (MTHNF). This was one of five such evaluations that comprise a multi-unit case study, whose aim is to provide the Forest Service with a better understanding of the certification process, and how their management aligns with the FSC standards for forest stewardship. By pre-arranged agreement, these evaluations were not intended to result in the award of certification.

An interdisciplinary team of natural resource specialists was empanelled by SCS to conduct the assessment in September 2006. The team collected and analyzed written materials, conducted interviews and completed a five day field and office evaluation of the subject property as part of the simulated certification evaluation. Upon completion of this fact-finding phase, the team determined conformance to the FSC Principles, Criteria, and Regional Indicators in order to ascertain whether award of certification would be warranted, were a genuine certification evaluation to be conducted.

The following pages detail the process that was undertaken and the audit team's findings. Of particular interest, the report identifies several non-conformances relative to the FSC Pacific Coast Regional Standard. As well, the report discusses identified non-conformances relative to a set of "additional considerations" that were developed through a consultative process by SCS prior to the field evaluation. These "additional considerations" attempt to anticipate what might be promulgated by the FSC as supplemental indicators applicable to National Forest management. That is, in the event that a bona fide certification evaluation were to be conducted on the Mt. Hood National Forest (or any other National Forest System unit), the certification standard would entail both a pertinent FSC regional standard as well as a set of endorsed supplemental indicators applicable to the management of National Forests.

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## SECTION A- PUBLIC SUMMARY AND BACKGROUND INFORMATION

### 1.0 GENERAL INFORMATION

#### 1.1 FSC Data Request

Applicant entity	USDA Forest Service – Mt. Hood National Forest
Contact person	Nancy Lankford, Forest Silviculturist
Address	Mt. Hood National Forest Supervisor's Office 16400 Champion Way Sandy, OR 97055 USA
Telephone	503-668-1700
Fax	503-668-1423
E-mail	<a href="mailto:nlankford@fs.fed.us">nlankford@fs.fed.us</a>
Certificate Type	Single FMU
Number of FMUs in scope that are	
less than 100 ha in area	0
100 - 1000 ha in area	0
1000 - 10 000 ha in area	0
more than 10 000 ha in area	1
Location of certified forest area	
Latitude	<i>E/W ### degrees ## minutes</i>
Longitude	<i>N/S ### degrees ## minutes</i>
Forest zone	Temperate
Total forest area in scope of certificate which is included in FMUs that:	
are less than 100 ha in area	0
are between 100 ha and 1000 ha in area	0
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	0
Total forest area in scope of certificate which is:	
privately managed <sup>1</sup>	0
Government managed	1,067,043 acres
Community managed <sup>2</sup>	0
Number of forest workers (including contractors) working in forest within scope of certificate	189 Forest Service Employees Contractors – Unknown
Area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	Unknown
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	Unknown
Area of forest classified as 'high conservation value	To be determined

<sup>1</sup> The category of 'private management' includes state owned forests that are leased to private companies for management, e.g. through a concession system.

<sup>2</sup> A community managed forest management unit is one in which the management and use of the forest and tree resources is controlled by local communities.

forest'	
List of high conservation values present <sup>3</sup>	To be determined
Chemical pesticides used	- Dicamba - Glyphosate - Picloram - Strychnine - Triclopyr
Total area of production forest (i.e. forest from which timber may be harvested)	
Area of production forest classified as 'plantation' for the purpose of calculating the Annual Accreditation Fee (AAF)	0
Area of production forest regenerated primarily by replanting <sup>4</sup>	
Area of production forest regenerated primarily by natural regeneration	
List of main commercial timber and non-timber species included in scope of certificate (botanical name and common trade name)	Douglas fir, noble fir, western hemlock, western red cedar, ponderosa pine, grand fir, silver fir, western white pine, western larch, lodgepole pine
Probable Sale Quantity (PSQ)	64 MMBF/year
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	Unknown
List of product categories included in scope of joint Forest Management (FM)/Chain-of-Custody (COC) certificate and therefore available for sale as FSC-certified products (include basic description of product - e.g. round wood, pulp wood, sawn timber, kiln-dried sawn timber, chips, resin, non-timber forest products, etc.)	Sale of standing trees (stumpage)

## Conversion Table English Units to Metric Units

### Length Conversion Factors

<b>To convert from</b>	<b>to</b>	<b>multiply by</b>
mile (US Statute)	kilometer (km)	1.609347
foot (ft)	meter (m)	0.3048
yard (yd)	meter (m)	0.9144

### Area Conversion Factors

<b>To convert from</b>	<b>to</b>	<b>multiply by</b>
square foot (sq ft)	square meter (sq m)	0.09290304
acre (ac)	hectare (ha)	0.4047

### Volume Conversion Factors

#### Volume

<b>To convert from</b>	<b>to</b>	<b>multiply by</b>
cubic foot (cu ft)	cubic meter (cu m)	0.02831685
gallon (gal)	liter	4.546

<sup>3</sup> High conservation values should be classified following the numbering system given in the ProForest High Conservation Value Forest Toolkit (2003) available at [www.ProForest.net](http://www.ProForest.net)

<sup>4</sup> The area is the *total* area being regenerated primarily by planting, *not* the area which is replanted annually. NB this area may be different to the area defined as a 'plantation' for the purpose of calculating the Annual Accreditation Fee (AAF) or for other purposes.

1 acre	= 0.404686 hectares
1,000 acres	= 404.686 hectares
1 board foot	= 0.00348 cubic meters
1,000 board feet	= 3.48 cubic meters
1 cubic foot	= 0.028317 cubic meters
1,000 cubic feet	= 28.317 cubic meters
Breast height	= 1.4 meters, or 4 1/2 feet, above ground level

Although 1,000 board feet is theoretically equivalent to 2.36 cubic meters, this is true only when a board foot is actually a piece of wood with a volume 1/12 of cubic foot. The conversion given here, 3.48 cubic meters, is based on the cubic volume of a log 16 feet long and 15 inches in diameter inside bark at the small end.

## 1.2 Management Context

As part of the National Forest System, the Mt. Hood National Forest is subject to a host of federal regulations. The principal regulations of greatest relevance to National Forest managers are associated with the following statutes:

- National Environmental Policy Act (NEPA)
- Endangered Species Act (ESA)
- Clean Water Act (CWA)
- National Forest Management Act (NFMA)
- Multiple Use-Sustained Yield Act (MUYSA)
- Wilderness Act
- Wild and Scenic Rivers Act
- Organic Act
- Code of Federal Regulations (CFR), Title VII
- Healthy Forests Restoration Act (NFRA)
- Occupational Safety and Health Act (OSHA)

For a complete list of federal statutes applying to National Forest management, see Appendix 1. Forest Service activities are also governed through administrative requirements such as applicable sections of the U.S. Code, the Forest Service Manual, and Forest Service Handbooks.

Other agencies partnered in various aspects of forest management on MTHNF include NOAA (National Oceanic and Atmospheric Administration) Fisheries, the US Fish and Wildlife Service, and the Oregon State Historic Preservation Office. Other Government to Government relations regarding forest management are maintained with the Confederated Tribes of Warm Springs.

### 1.2.1 Environmental Context

Mt. Hood is Oregon's tallest peak with a summit reaching 11,237 feet above sea level. It is an inactive volcano (the last eruptive activity occurred 200 years ago) within the Cascade Mountain Range, and is situated 50 miles east of the Portland metro area. Mt. Hood National Forest is bounded in the north by the Columbia River Gorge National Scenic Area, and in the south by the Willamette National Forest. MTHNF also shares a large border in the southeast

with the Confederated Tribes of Warm Springs Reservation.

Due to its location straddling the Cascade Range, MTHNF falls in two major ecoregions. The Pacific side constitutes the majority of the Forest; the climate at these lower elevations is mild and damp. Fast growing Douglas-fir stands dominate the productive, moist sites on this western portion of MTHNF. In contrast, the eastern slopes of the Cascades host a much drier, harsher climate, where temperatures are more variable throughout the year. The higher elevations of the eastside support grassy meadows and stands containing tree species such as lodgepole, ponderosa, and western white pine; grand, sub-alpine, and silver fir; and western larch.

Several federally listed threatened and sensitive plant and animal species are found within the MTHNF and are managed in accordance with the Endangered Species Act and other guiding documents. Currently, there are no listed endangered species on the Forest. The threatened species include six species of salmonids (subspecies of coho and Chinook salmon, steelhead and bull trout), the bald eagle and the northern spotted owl. The Oregon spotted frog is a candidate species for listing. The Regional Forester's sensitive species list includes Redband trout, five species of amphibians including the Cope's giant salamander, four bird species including the peregrine falcon and harlequin duck, two mammals (Bairds shrew and California wolverine), and 39 species of plants documented or suspected to occur on the MTHNF. Monitoring focuses on 9 of these plants, all of which are found in non-forest environments: yellow agoseris, sickle-pod rock cress, goldthread, cold water corydalis, black lily, Watson's lomatium, Adder's-tongue, violet suksdorfia, and pale blue-eyed grass. The sensitive lichen known as Pacific felt lichen is also present in some newly-discovered sites on the Forest. All proposed management activities are pre-inventoried for all threatened and sensitive species that are known or suspected to be within the area of proposed activity, and activities are subsequently designed to minimize or mitigate potential impacts.

There are five major river drainages on the MTHNF. The Clackamas River, Fifteen-Mile Creek, Hood River, Sandy River, and White River Basins not only support irrigation and domestic water supply, but also provide habitat for salmon, steelhead, and resident trout.

### **1.2.2 Socioeconomic Context**

The Portland/Vancouver metropolitan area (population roughly 2.1 million) exerts a great deal of social and economic influence on the MTHNF. On the "west side" more than 50% of the Forest's perimeter is in the urban interface, resulting in heavy recreational use, urban social problems, and other population stresses within the Forest. Because of its close proximity to Portland and the unique management environment this creates, MTHNF is considered an "urban national forest".

Most of MTHNF falls within Multnomah, Clackamas, Hood River, and Wasco counties. While the former two are comprised of urban communities as mentioned above, Hood River and Wasco counties consist of sparsely-populated rural communities with more emphasis on farming and agriculture.

The 2002 LUCID (Local Unit Criteria and Indicator Development) pilot test estimated that roughly 2,700 local jobs resulted from timber and recreation activities on MTHNF including camping/day use, winter sports, logging, and sawmills. The number of Forest Service full-time equivalent positions (FTEs) on MTHNF has steadily decreased over the years due primarily to budget cuts, from over 800 in the early 1990s to just 189 in Fiscal Year 2006 (FY06).

The adjacent Confederated Tribes of Warm Springs (CTWS) Reservation is home to the Warm Springs, Wasco, and Paiute Native American Tribes. Through a Memorandum of Understanding, the Forest Service and CTWS have formed a government-to-government relationship and work in cooperation on many projects. For example, MTHNF contains several sites traditionally used by CTWS for huckleberry gathering. Although the Forest Service does not have the ability to exclusively set aside these areas for particular users, they have worked in collaboration with CTWS to protect and maintain the viability of the huckleberry resource.

### **1.3 Forest Management Enterprise**

#### **1.3.1 Land Use**

In 1893, President Cleveland created the Cascade Forest Reserve in order to protect the Cascade mountain range from the Columbia River to the northern California border. The Reserve was split into several National Forests in 1908; the northern portion was merged with the Bull Run Reserve to form the Oregon National Forest, and was renamed the Mt. Hood National Forest in 1924.

All forests in the National Forest System are required to be managed for the diversity of services they afford, including timber, recreation, fish and wildlife habitat, water resources, wilderness, non-timber forest products, and others. The Forest Service manages for all of these land uses throughout the MTHNF.

Much of the MTHNF has been administratively set aside, including the Badger Creek, Bull of the Woods, Mark O. Hatfield, Mt. Hood, and Salmon-Huckleberry Wilderness Areas (totaling 186,200 acres); and the Bull Run Watershed Management Unit (91,000 acres), which provides drinking water to Portland. The Forest also contains many acres of riparian reserves, as well as Research Natural Areas (RNAs), which are designed to preserve examples of ecosystems in their natural, unmodified state for the benefit of research and education.

Recreation has been one of the primary uses of the MTHNF since its inception. The Forest receives 4.5 million visitors per year, mostly for day uses. Hiking, camping, hunting, fishing, and mountain biking are all popular activities. In the wintertime, many visitors come to use the ski areas, snow parks, and Nordic trails. Timberline Lodge is the most notable tourist destination with an estimated 2 million visitors per year, and is also a starting point for mountaineers summiting Mt. Hood. The Forest Service has agreements with many special

use area permittees who are contracted to operate and maintain the campgrounds, ski areas, and other recreational sites.

Timber harvesting as a land use has steadily declined over the past twenty years, and is discussed further in Section 1.4.

### **1.3.2 Land Outside the Scope of Certification**

The National Forest System is comprised of 155 National Forests that cover a total of 193 million acres, or 8.5% of the total land area of the United States. MTHNF amounts to about one half of one percent of the area of the entire “forest estate” as managed by the USDA Forest Service. Were the Forest Service to seek genuine forest management certification endorsed by the FSC, it would be unfeasible to include the entire forest system in the scope of one certificate not only due to the sheer size and complexity of the system, but also because of the unique qualities of each individual forest’s management.

## **1.4 Management Plan**

The “management plan” for the MTHNF is, on a de facto basis, comprised of a suite of numerous documents (some more current than others) associated with an array of planning processes at multiple spatial and temporal scales. Some of these documents represent integrated plans for defined land units, while other planning processes are focused on single issues, topics or uses.

The overarching planning document for the Forest is the Mt. Hood National Forest Land and Resource Management Plan (1990). While this original plan is now more than 15 years old, 16 amendments have been made, most notably the 1994 Northwest Forest Plan which provides standards and guidelines for managing habitat in the range of the Northern spotted owl. The MTHNF Forest Plan is scheduled to undergo revision beginning in 2009, with preparation of a draft forest plan due in 2012.

The next level of management planning consists of watershed analysis, which was introduced with the Northwest Forest Plan and was intended to serve as an intermediate analysis between land management planning and project planning. The Forest is separated into 28 planning units of fifth-field watersheds in order to identify key issues and offer management suggestions at a smaller scale. Watershed analyses compare historic ranges of variability to current conditions for disturbances and vegetation composition, and provide a framework for identifying the desired future condition of the areas.

Actual “on the ground” management is covered by NEPA planning documents (e.g., Environmental Assessments, Environmental Impact Statements, Categorical Exclusions) prepared prior to commencement of land management activities.

### **1.4.1 Management Objectives**

The 1990 MTHNF Forest Plan lists 45 goals which are considered “building blocks” for the

desired future condition of the Forest. Among those are:

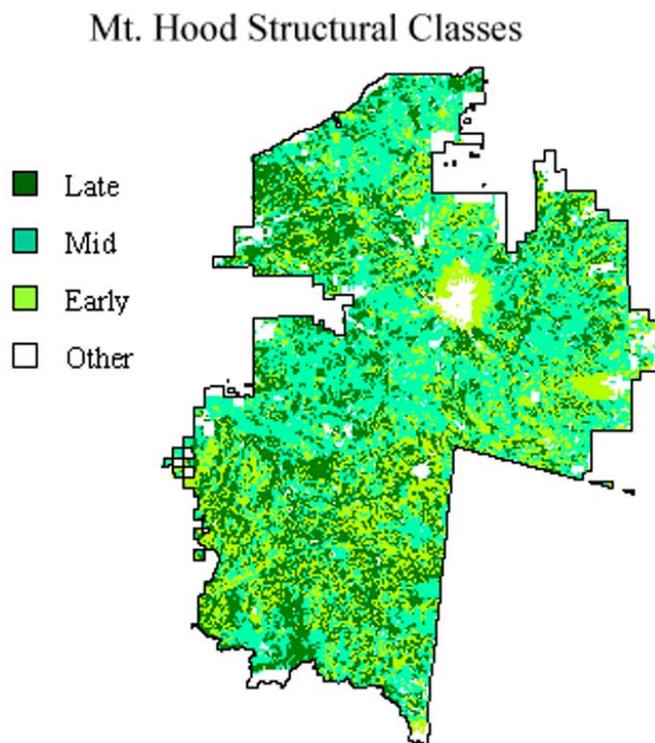
- Protect, maintain or enhance the character and quality of water. Provide long-term sustained production of water.
- Honor treaty rights and privileges of Native Americans. Protect and preserve Native American ceded rights and privileges to access and use the Forest for traditional religious values.
- Maintain or increase fish habitat capability and assure long-term sustained production of fish.
- Protect, maintain and/or restore soil productivity throughout the Forest; stabilize and/or restore damaged or disturbed soil areas.
- Maintain viable populations of native and desirable non-native wildlife and plant species in perpetuity.
- Protect or enhance habitat for threatened, endangered, or sensitive plants and animals.
- Manage recreational access to protect natural resources, provide for public safety, and minimize conflicts among the various users of the Forest.
- Provide a broad range of year-round, high quality a) developed recreation opportunities, b) dispersed recreation opportunities
- Provide fire protection, fuels treatment and pest management programs that are responsive to land and resource management goals and objectives.
- Cooperate with other Federal, State and local regulatory agencies to protect air quality and minimize impacts on smoke sensitive areas.
- Provide Forest visitors with visually appealing scenery. Manage all forest lands to attain the highest possible visual quality commensurate with other resource values.
- Manage vegetation and provide quality forage conditions for commercial domestic livestock. Prevent unacceptable damage to other resource values from commercial livestock grazing.
- Integrate the activities of implementing the MTHNF Plan with activities of local dependent communities to: 1) improve employment opportunities, 2) improve incomes and well-being of the nation's rural people, and 3) strengthen the capacity of rural America to compete in the global economy.
- Produce wood fiber at sustainable levels consistent with other resource values and economic efficiency.
- Maintain genetic diversity of forest stands. Maintain the health of the forest stands through genetic resilience, thus reducing the impact of disease, animal, insect, or climatic damage.
- Manage the Forest to provide for the many significant values of old growth forest for the present and future generations.

#### **1.4.2 Forest Composition**

As mentioned earlier, there is a prominent dichotomy between forest compositions on the eastside and westside of the MTHNF due to the fact that it straddles the Cascade Range. The westside consists of stands dominated by Douglas-fir (*Pseudotsuga menziesii*), western hemlock (*Tsuga heterophylla*), noble fir (*Abies procera*), mountain hemlock (*Tsuga*

*mertensiana*), and Pacific silver fir (*Abies amabilis*) in a variety of age classes. Lodgepole pine (*Pinus contorta*), western larch (*Larix occidentalis*), western white pine (*Pinus monticola*), ponderosa pine (*Pinus ponderosa*), sub-alpine fir (*Abies lasiocarpa*), and grand fir (*Abies grandis*) are found on the eastside and at higher elevations. Some hardwoods, such as oak and bigleaf maple, are also found throughout MTHNF.

As evidenced in the illustration below, most prevalent age class on MTHNF is currently mid-seral. Management direction is focused on moving the Forest, over time, towards the desired future condition of a greater proportion of stands being in the late seral classification.



From the FS Powerpoint Presentation *Terrestrial Overview for FLT*.

### 1.4.3 Silvicultural Systems

For C1 (Timber Emphasis)-designated lands on MTHNF, of which there are roughly 188,000 acres, the Forest Plan states that “the full range of silvicultural options should be considered under appropriate conditions”. Regeneration, shelterwood, group selection, and thinning harvests are all present on MTHNF to varying degrees.

As can be seen in the FY05 Monitoring Report graph below, over the last ten years commercial thinning has become the most prevalent harvest method on the Forest. Stands are thinned from below to assist in accelerating growth of the remaining trees, thus moving MTHNF toward its desired future condition of an increase in late successional stands.

MTHNF thinning prescriptions have increasingly employed the concept of variable density thinning (VDT), which enhances species and structural diversity by varying the spaces between residual trees, and thinning small pockets in some areas while leaving others untreated.

Salvage harvesting does occur on MTHNF, particularly on the eastside. The main objective is to reduce the amount of hazardous fuel build-up in stands with high mortality associated with insect outbreaks.

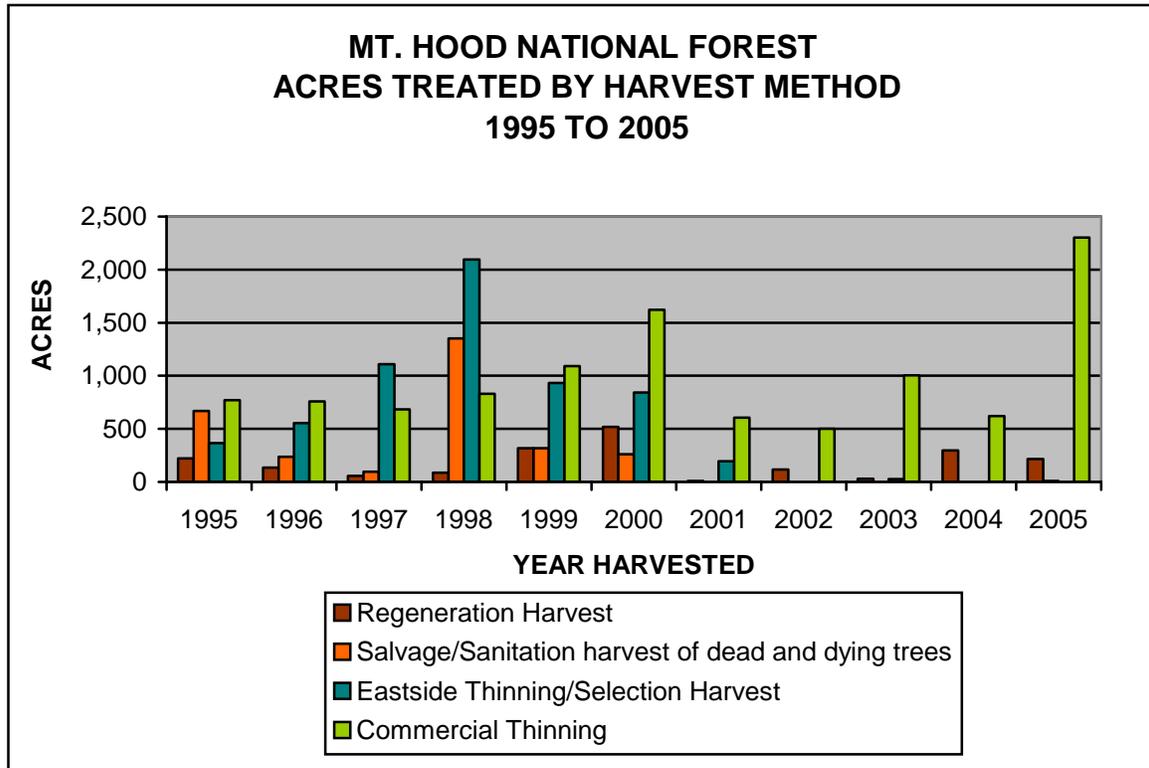


Figure 2-2 from the FY05 MTHNF Monitoring and Evaluation Report (pg 69).

#### 1.4.4 Management Systems

The Forest Service is organized into a hierarchical structure that is centered at the Washington, D.C. office, with delegation of authority through 9 Regions, 155 Forests, and more than 600 Ranger Districts. Mt. Hood National Forest is located in Region 6 (Pacific Northwest), which includes the 19 National Forests in Oregon and Washington.

At the Forest level, management is led by the Forest Supervisor. MTHNF employs a number of specialists whose areas of responsibility cover the entire Forest, including a silviculturist, fire planner, ecologist, recreation manager, etc.

There are four Ranger Districts (RDs) on MTHNF: Zigzag, Barlow, Hood River, and the Clackamas River (formerly Ripplebrook and Estacada RDs). Each RD is led by a District Ranger with district-level specialists. Program oversight is provided by Forest-level

counterparts. Frequently, district specialists are shared between the two districts on the westside, or the two on the eastside.

#### **1.4.5 Monitoring System**

Consistent with the multiple layers of management planning, comprehensive monitoring on MTHNF takes many different forms. Monitoring of the implementation of the Forest Plan is required by the National Forest Management Act. Each year, the Forest produces the annual Monitoring and Evaluation Report, which is a publicly available summary of the Plan's implementation. Additionally, individual projects may be selected for monitoring through watershed assessments and the environmental assessment process. It should be noted that monitoring projects fluctuate from year to year based on available funding. For example, the recent elimination of the MTHNF road crew has led to more informal assessments of road conditions.

Topics covered through various monitoring projects include, but are not limited to:

- Implementation of FS procedures
- Timber inventory, growth, and yield. MTHNF is phasing out their forest inventory system, the Current Vegetation Survey, (CVS), and replacing it with a customized, Forest Inventory & Analysis (FIA)-based Continuous Forest Inventory (CFI)
- Species-specific fauna and flora populations, as well as coarser scale habitat changes (threatened, endangered and sensitive species and general wildlife monitoring)
- Effects of grazing on meadow and riparian areas
- Water quality
- In-stream and riparian habitat & fisheries
- Spread and presence of invasive exotic species
- Illegal activities on the Forest (through law enforcement)
- Recreation use of the Forest
- Economic effects of forest management

#### **1.4.6 Estimate of Maximum Sustainable Yield**

The 1990 MTHNF Forest Plan lists an Allowable Sale Quantity (or long-term sustained yield capacity) of 189 MMBF (million board feet) per year. However, the Northwest Forest Plan Probable Sale Quantity (PSQ), which superseded the Forest Plan ASQ, was identified as 64 MMBF due to adjusted land allocations and direction in the Northwest Forest Plan. The PSQ of the Forest has been 64 MMBF since 1995, although the amount offered and harvested has fallen well below that level since the late 1990s.

#### **1.4.7 Estimated, Current and Projected Production**

The graph below displays offered, awarded, and harvested volumes since 1994. MTHNF has been harvesting at only a fraction of the PSQ; in 2005 the Forest offered 22.2 MMBF (34.6% of PSQ). At this time, the Forest Service estimates that approximately 24 MMBF will be sold per year for FY06 through FY08.

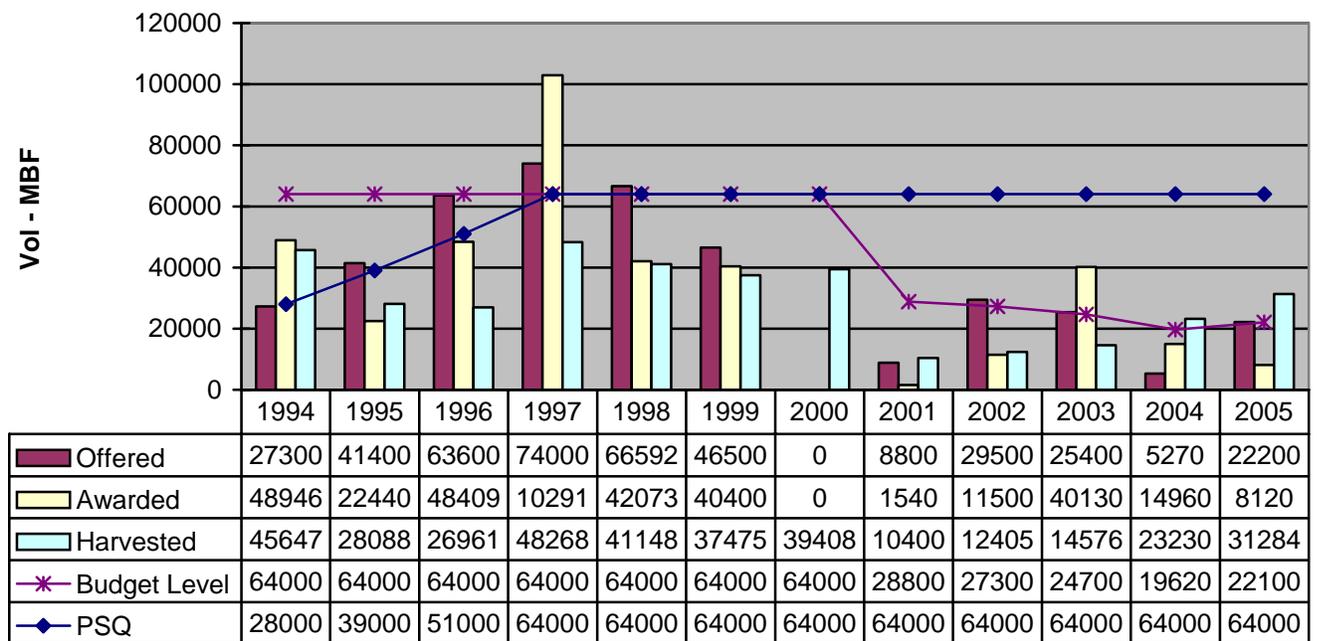


Figure 2-1, Volume Summary from the FY05 MTHNF Monitoring and Evaluation Report (pg 65).

#### 1.4.8 Chemical Pesticide Use

Chemical pesticide use on the Mt. Hood National Forest is strictly controlled and kept to a minimum (530 acres in FY05). Herbicides are applied for the purposes of controlling the spread of invasive exotic plant species and restoring native plant communities, and of controlling pocket gopher populations; chemicals are not being used for site preparation or other chemical-dependent silvicultural purposes. All treatments are carried out by hand, by licensed pesticide applicators.

The draft EIS of *Site-Specific Invasive Plant Treatments for Mt. Hood National Forest and Columbia River Gorge National Scenic Area in Oregon* is currently under review, with a decision expected in September/October 2007. This 16<sup>th</sup> amendment to the MTHNF Forest Plan proposes noxious weed treatments on 13,000 acres, utilizing herbicide application when warranted. Several new chemicals are proposed for use on MTHNF in addition to those currently used to control exotic weeds.

Chemicals currently used on MTHNF:

- Dicamba\*
- Strychnine\*
- Glyphosate
- Picloram
- Triclopyr

Chemicals proposed for use on MTHNF:

- Imazapyr

- Chlorsulfuron
- Clopyralid
- Glyphosate
- Imazapic
- Metsulfuron methyl
- Picloram
- Sethoxydim
- Sulfometuron methyl
- Stychnine\*
- Triclopyr
- Nonylphenol polyethoxylate (NPE)

\*These chemicals appear on the FSC's list (or proposed list) of prohibited chemical pesticides.

## **2.0 GUIDELINES/STANDARDS EMPLOYED**

As MTHNF is located in Oregon, the certification case study which is the subject of this report was conducted against the duly approved FSC Pacific Coast (USA) Regional Forest Stewardship Standard, v9.0.

In addition to the regional standard, the forest management operation was evaluated against a set of National Forest "Additional Considerations" (ACs) developed for the project. These ACs were meant to simulate one of the thresholds established by FSC-US prior to the possible certification of federal lands: the development of indicators supplemental to the regional standards reflecting federal land management. In the pilot evaluation, these requirements were termed "Additional Considerations" to avoid confusion or the appearance that pilot auditors are usurping the role of FSC-US in developing duly approved supplemental indicators. The ACs were developed through a peer review and public participation process prior to the start of the field evaluation.

The final version of the regional standard, with the additional considerations, is available on the SCS website ([http://scscertified.com/forestry/forest\\_nfac.html](http://scscertified.com/forestry/forest_nfac.html)).

## **3.0 THE CERTIFICATION ASSESSMENT PROCESS**

### **3.1 Assessment Dates**

**Preliminary Evaluation:** A preliminary evaluation (also known as a "scoping visit") of MTHNF took place from August 22-23, 2006. Please see Appendix 2 of this report for the Preliminary Evaluation Audit Report.

**Main Evaluation (Simulated):** The main evaluation took place Monday, September 18 through Friday, September 22, 2006.

## 3.2 Assessment Team

### **Robert Hrubes, Ph.D. Forest Economist and Registered Professional Forester**

#### **Project Role: FSC Team Leader on Scoping and Full Assessment**

Dr. Hrubes is a California registered professional forester (#2228) and forest economist with over 30 years of professional experience in both private and public forest management issues. He is presently Senior Vice-President of Scientific Certification Systems. In addition to serving as team leader for the Michigan state forestlands evaluation, Dr. Hrubes worked in collaboration with other SCS personnel to develop the programmatic protocol that guides all SCS Forest Conservation Program evaluations. Dr. Hrubes has previously led numerous audits under the SCS Forest Conservation Program of North American public forests, industrial forest ownerships and non-industrial forests, as well as operations in Scandinavia, Chile, Japan, Malaysia, Australia and New Zealand. Dr. Hrubes holds graduate degrees in forest economics (Ph.D.), economics (M.A.) and resource systems management (M.S.) from the University of California-Berkeley and the University of Michigan. His professional forestry degree (B.S.F. with double major in Outdoor Recreation) was awarded from Iowa State University. He was employed for 14 years, in a variety of positions ranging from research forester to operations research analyst to planning team leader, by the USDA Forest Service. Upon leaving federal service, he entered private consulting from 1988 to 2000. He has been Senior V.P. at SCS since February, 2000.

### **Mike Ferrucci, Master of Forestry.**

#### **Project Role: SFI Team Leader Scoping and Full Assessments, FSC Team Member**

Michael Ferrucci is a founding partner and President of Interforest, LLC, and a partner in Ferrucci & Walicki, LLC, a land management company that has served private landowners in southern New England for 25 years. He has a B.Sc. degree in forestry from the University of Maine and a Master of Forestry degree from the Yale School of Forestry and Environmental Studies. Mr. Ferrucci's primary expertise is in management of watershed forests to provide timber, drinking water, and the protection of other values; in forest inventory and timber appraisal; hardwood forest silviculture and marketing; and the ecology and silviculture of natural forests of the eastern United States. He also lectures on private sector forestry, leadership, and forest resource management at the Yale School of Forestry and Environmental Studies. Mr. Ferrucci has participated in forest management assessments in 27 states, and has conducted joint FSC-SFI Certification Assessments on over 14 million acres of forestland in the United States. For this project, Mr. Ferrucci functioned as an employee of NSF.

### **David Vesely, M.Sc.**

#### **Project Role: Audit Team Member; Wildlife Specialist**

David Vesely is the President and a co-founder of the Pacific Wildlife Research Institute based in Corvallis, OR. PWRI is a firm which provides consulting services in wildlife surveys, habitat assessment, watershed assessment, conservation planning, and forestry. Mr. Vesely has an MS in Forest Science from Oregon State University. His background in wildlife research and inventories include: small mammal trapping in western Oregon, winter surveys for forest birds in Alaska, radio-telemetry of sage grouse in the Great Basin, among

many other projects. Mr. Vesely's current research interests include model-based assessments of wildlife populations and habitats, habitat selection by terrestrial salamanders, and wildlife-land management interactions. Mr. Vesely also participated as an auditor for the Lakeview FSU evaluation.

**David Perry, Ph.D. Ecology, MS Forest Economics, MS Physics, BS Forest Management**

**Project Role: Audit Team Member, Forest Ecology specialist**

David Perry is a Professor Emeritus of Ecosystem Studies and Ecosystem Management in the Department of Forest Science at Oregon State University. His research interests include ecosystem management, and ecosystem structure and function - particularly the role of ecological diversity in system stability. Dr. Perry has spent much of his career researching and publishing on forest science topics such as structure and function of ecosystems and landscapes, the role of biodiversity in ecosystem processes, interactions among ecological scales, sustainable resource management, and restoration ecology. Dr. Perry was also an audit team member for the Lakeview FSU certification evaluation.

**Jim Spitz, BS Forest Management, MBA Forest Industries**

**Proposed Role: Audit Team Member, Forest Industries specialist**

Mr. Spitz has been a forest industries consultant for over 25 years, and has worked throughout the Pacific Northwest and beyond with large businesses and small landowners. Notably, since 1988 Mr. Spitz has served as the primary advisor to the CEO and Tribal Council of the Confederated Tribes of Warm Springs on management of their 400,000 acre forest and associated sawmilling, manufacturing, and merchandizing operations. Prior to his work as an independent consultant, Mr. Spitz was employed by the USDA Forest Service for 17 years as a systems analyst, forest management planner, timber sale administrator, and forest pathology research technician (among other appointments). Mr. Spitz' business is based out of Bend, Oregon and he was also a member of the Lakeview FSU assessment team.

**Karen Steer, MS Social Ecology**

**Proposed Role: Audit Team Member, Stakeholder Outreach and Social Ecology specialist**

Karen Steer is a Program Director at Sustainable Northwest (SNW) in Portland, OR, where she manages projects that integrate forest conservation with community economic development. Through SNW's Healthy Forests, Healthy Communities Partnership, Karen works with rural organizations and enterprises to build capacity, markets and business-to-business networks for forest stewardship and wood products manufacturing, and manages an FSC Group Chain-of-Custody certification. Through SNW's Forest Policy and Stewardship program, she provides diverse support to community groups and collaborative initiatives engaged in forest restoration. Karen's experiences with FSC are varied, and include serving on the Federal Lands Committee, the Pacific Coast Regional Standards Working Group, the Social Committee, and as a FSC-US board member. She also served as the social scientist for Scientific Certification System's Washington DNR public lands certification assessment. Prior work experience includes positions with The Nature Conservancy's Sustainable Forestry program in Bolivia (BOLKFOR II), the National Park Service Social Science Program, the Army Corps of Engineers' lower Snake River juvenile salmon migration

feasibility study (community impact assessment), and the Peace Corps, where she served as a protected areas consultant in Honduras. Karen holds a Masters degree from the Yale School of Forestry and Environmental Studies.

**Jonathan Kusel, Ph.D. Resource Sociologist.**

**Proposed Role: Audit Team Member, Stakeholder Outreach and Resource Sociology specialist**

Jonathan is founder and executive director of the Sierra Institute for Community and Environment, an organization that specializes in community-based natural resource research and education. Recently he served as the principal investigator of the National Community Forestry Center, and director of the Pacific West Community Forestry Center, which focused its work on underserved and ethnically diverse groups. As a community sociologist Jonathan participated on the Clinton Administration's "Option 9" Forest Ecosystem Management Assessment Team, He also led the community assessment team and public participation team for the Sierra Nevada Ecosystem Project. Jonathan has worked on the Montreal Indicators, serving as team leader for review of Criterion and, more recently as part of the final review team for Criterion 6 and Criterion 7 immediately prior to the ten-year world review.

Jonathan has written or edited three books on community forestry: *Forest Communities, Community Forests, Community Forestry in the United States: Lessons from the Past, Crafting the Future* (coauthored with Mark Baker) and *Understanding Community-Based Forest Ecosystem Management* for which he served as science editor. Jonathan has a Ph.D. in resource sociology from the University of California, Berkeley.

### **3.3 Assessment Process**

#### **3.3.1 Itinerary**

The main pilot certification evaluation took place over a five-day period, from Monday, September 18 through Friday, September 22, 2006. The first three days were spent visiting administrative offices as well as a sample of representative field sites, with the goal of gaining exposure to the wide array of management activities on the MTHNF. Some sites were chosen at random, while others were selected because they were areas of special interest or stakeholder concern. On the evenings of Monday the 18<sup>th</sup> and Tuesday the 19<sup>th</sup>, public meetings were held to allow stakeholders to provide input to the audit team as to the Forest Service's management of MTHNF. During the last two days of the evaluation, the audit team reviewed information gathered in the field, via stakeholder consultation and through document review, and deliberated to ascertain MTHNF's level of conformance to the Pacific Coast Regional Standard and Additional Considerations for National Forests.

#### **Sunday, September 17**

##### *Evening*

The audit team convened in Sandy, OR for introductions and a brief overview of the week's planned activities. Nancy Lankford joined the auditors to review and finalize the site visit itinerary.

#### **Monday, September 18**

*Morning MTHNF Supervisor's Office – Sandy*

**Full audit team present**

**Forest Service (FS) Personnel present:**

Rick McClure	Doug MacCleery	Jennie O'Connor	Jim Rice
Christine Arredondo	Nancy Lankford	Jeff Jaqua	Malcolm Hamilton
Jim Wrightson	Deb Roy	KJ Silverman	Jim Tierney
Daina Bambe	Mike Redmond	Gary Larsen	Lisa Norris

**Please see Appendix 2 for the complete list of Forest Service personnel that participated in the evaluation.**

*8:00-11:00am – Opening Meeting*

- Introductions and overview of the National Forest certification case study & assessment process – Robert Hrubes and Mike Ferrucci
- Overview of the Mt. Hood National Forest; citizen stewardship and management challenges – Gary Larsen, Forest Supervisor
- Overview of management direction/project planning (including NEPA) – Mike Redmond, Environmental Coordinator
- Analysis of stand conditions using forest inventory data – Nancy Lankford, Forest Silviculturist

*11:00am-12:30pm – Panel Discussions/Interviews with MTHNF Staff*

- Timber & Road Resources – Jim Rice, Forest Products Resource Manger; Nancy Lankford; Jim Tierney, Engineering Zone Manager; Tim Johnson, Zone Timber Sale Contracting Officer.
- Wildlife, Fisheries, and Ecological Resources – Alan Dyck, Wildlife Program Manager; Ivars Steinblums, Forest Hydrologist; Dan Shively, Forest Fisheries Program Manager; Jeanne Rice, Forest Ecologist.
- Recreation, Tribal, and Cultural Resources – Malcolm Hamilton, Recreation Program Manager; Rick McClure, Forest Archeologist/Heritage Program Manager, Jeff Jaqua, Zigzag District Archeologist; Gary Larsen.

*Afternoon Zigzag Ranger District*

**Full audit team present**

**FS personnel present:**

Lisa Norris	Jeff Jaqua	Todd Parker	Jennie O'Connor
Dan Shively	Jim Tierney	Jim Wrightson	Christy Covington
Jennifer Harris	Duane Bishop	Daina Bambe	Kathleen Walker
Jim Rice	Doug Jones	Malcolm Hamilton	Rick McClure

*1:00-2:00pm – Zigzag Ranger Station*

- Introductions; overview of the Zigzag Ranger District – Daina Bambe, Acting District Ranger
- Tailgate safety review

*2:00-5:00pm – Field Tours on the Zigzag RD*

**Tour A: Bull Run Road Decommissioning**

**Audit team present:** Ferrucci, Hrubes, Spitz

**FS personnel:** Lisa Norris, Jim Tierney, Todd Parker, Jennie O'Connor  
Environmental Assessment (EA) to decommission 136 miles of roads within the Bull Run Watershed Management Unit. Roughly 63 miles would be allowed to grow in and close naturally, and 73 miles would be decommissioned mechanically. Topics discussed: road maintenance, road decommissioning, hydrology.

**Tour B: Fisheries, Water Quality, Fuels Reduction**

**Audit team present:** Perry, Vesely, Steer

**FS personnel:** Dan Shively, Duane Bishop, Jim Wrightson, Christy Covington, Jennifer Harris, Mike Redmond, Daina Bambe

- 1) Salmon River side channel maintenance project – viewed 2005 reopening of two historic side channels that had been restored in summer of 1996, only to be closed off with sediment/debris from a flood event later that winter. Flow conditions were enhanced, more pieces of large woody debris were introduced in each side channel, and volunteers planted conifer and riparian tree seedlings at the two sites. Topics discussed: side channel habitat in salmon and steelhead production, importance of large woody debris, stream restoration in salmon recovery.
- 2) Government Camp fuels reduction project – visited a project to treat areas of unnaturally high fuel accumulations in the Government Camp urban-wildland interface. Two fuel breaks were created, totaling 15 acres and ranging in width from 150 to 300 feet. Topic discussed: hazardous fuels treatments in wildland-urban interfaces.
- 3) Timberline Express Chairlift – proposed development for 2007 installation of a new chairlift and associated trails at the Timberline Ski Area. Topics discussed: recreation management, concessionaires.

**Tour C: Recreation, Community Involvement, Partnerships**

**Audit team present:** Kusel

**FS personnel:** Kathleen Walker, Jim Rice, Doug Jones, Malcolm Hamilton

- 1) Government Camp Trails – project underway to create 9.6 new miles of year-round, multi-use recreational trails that link the Government Camp community to other key destinations within the MTHNF. Topics: Americorps & Clackamas County collaboration, Government Camp revitalization.
- 2) Timberline Lodge – tour and brief history/overview of Timberline Lodge. Topics: concessionaire relations, recreation management (~2 million visitors/year).
- 3) Trillium Lake – visited the Trillium Lake campground, which is the most popular on the MTHNF (57 sites), as well as the biggest Nordic skiing destination. Topics: campground operation and maintenance by concessionaire, recreation management.

*Evening MTHNF Supervisor's Office – Sandy*

*7:30-9:00pm Public Stakeholder Meeting*

**Full audit team present, Doug MacCleery (FS Washington office)**

**Stakeholders present**

Alex Brown

Jerry King

Jessica Martin

David Mann

**Affiliation**

Executive Director – Bark

Community member, Log Scaler

Volunteer – Bark

Community member, Engineer

John Tullis  
Petr Kakes  
Steve Lenius  
Steve Wilent  
Susan Corwin

Timberline Lodge  
Hurricane Racing  
Retired Forest Service employee - MTHNF  
The Forestry Source – SAF newsletter  
Barlow Trail Association

## **Tuesday, September 19**

*Morning Clackamas River Ranger District*

### **Full audit team present**

### **FS personnel present:**

Jim Roden	Jim Tierney	Malcolm Hamilton	Jim Rice
Jennie O'Connor	Robert Bergamini	Glenda Goodwyne	Gwen Collier
Sharon Hernandez	Nancy Lankford	Burnham Chamberlain	Andrei Rykoff
Doug MacCleery			

*8:15-9:45am Clackamas River Ranger Station, Estacada*

- Introductions and overview of the certification pilot study process – Ferrucci and Hrubes
- Welcome and overview of the Clackamas River RD (formerly the Estacada and Ripplebrook RDs) – Andrei Rykoff, Clackamas River District Ranger
- Management issues unique to the Clackamas River RD: fisheries program, special forest products, most active of the RDs in vegetation management.
- Overview of the 2007 Thin planning process – Jim Rice and Jim Roden

### **Field Tours**

(Auditors Steer and Kusel remained at Ranger Station in the morning to continue stakeholder consultations)

*10:30-11:15am – 2007 Thin, Sandstone Project Area.* Proposed variable-density commercial thinning project totaling 4300 acres, all in 40-50 year old plantations. Of this, 2300 acres are within Late Successional Reserves (LSRs) or riparian reserves, where the goal is to accelerate the stands' transition into old growth. Topics: Clackamas RD planning efforts, hardwoods management, stakeholder collaboration, old growth on MTHNF.

*12:00-12:30pm – 'M' Commercial Thinning.* Visited a 45 year old Douglas fir stand (matrix land) that had been thinned to about 110 trees per acre earlier in the year. The management goal was to reduce stocking to accelerate stand growth. Discussion topics: variable density thinning, "designation by description" marking technique.

*12:40-1:30pm*

*Cub/Bear II* (Auditors: Ferrucci, Vesely; FS: Lankford, Goodwyne, O'Connor). ~2000 acre area with slow-growing/diseased stands repeatedly subject to windthrow and storm damage. Watershed Analysis revealed highly fragmented late seral habitats. 206 acres of late seral stands with little or no interior value were targeted for regeneration harvests.

*Tarzan Timber Sale* (rest of audit team & FS staff). 2004 regeneration harvest of a 200 year old Doug-fir stand, classified as C-1 (timber emphasis) matrix land. 15 tpa of the largest,

most decadent trees retained, and 10% of stand remained in a clumped, unharvested reserve. Topics: Northwest Forest Plan retention guidelines, harvesting of late successional forests, FSC criterion 6.3.d., harvesting in Type 1 old growth.

2:00-4:30pm

**Group A – Vegetation Management**

**Audit team present:** Ferrucci, Vesely, Spitz, Perry

**FS personnel:** Rice, Goodwyne, Hernandez, Collier, Johnson, Lankford, Roden, O'Connor, Tierney, Ryckoff

Visited Old Lemiti thinning project, areas of mountain pine beetle epidemic, and a Hazard Management Project with the CTWS. Older lodgepole pine stands in the southeastern portion of the Clackamas RD have been thinned over the last 10 years, and are now subject to a mountain pine beetle epidemic. The CTWS are concerned about the threat of wildfire in this area that is adjacent to their timber emphasis lands. The FS and CTWS are in the early stages of collaboration to put forth a fuel break project. Topics: planning efforts, tribal lands collaboration, recreation sites, potential for large wildfires.

**Group B – Recreation**

**Audit team present:** Hrubes, Steer

**FS personnel:** Hamilton, Bergamini

Indian Henry Campground: visited an 86-site campground operated and maintained by permittee 1,000 Trails. There was concern over visitor safety due to root rot in the area; the FS has removed several hazard trees over the years.

Ladee Flats: This area has been very popular with off highway vehicles (OHV) users over the past 30 years and as a result, there are concentrated areas of adverse resource impact. Some guardrails have been erected; most signage is removed by users almost as soon as it is put up. Ladee is being considered as a future OHV regulated area.

Topics: Recreation, OHV overuse, Transportation Management Plan.

*Evening*

7:15-9:20pm *Stakeholder Meeting in Portland*

**Audit team members present:** Hrubes, Kusel, Steer

**Stakeholders present:**

Alex Brown

Susan Jane Brown

Ivan Maluski

Christine Caurant

**Affiliation**

Executive Director – Bark

Attorney, Pacific Environmental Advocacy Center

Sierra Club

Oregon Natural Resources Council

**Wednesday, September 20**

*Morning Barlow and Hood River Ranger Districts*

**Full audit team present**

**FS personnel present:**

John Dodd

Rich Thurman

Kevin Slagle

Nancy Lankford

Doug MacCleery

Cheryl Sonnabend

Roy Shelby

Daina Bambe

Chris Rossel

Ray Weiss

Darcy Morgan

Michael Dryden

Dan Fissel

Jim Rice

Larry Rector

Scott MacDonald Erin Black Peggy Kain Jennie O'Connor Mark Kreiter  
Kim Smolt

8:30-10:15 *Hood River Ranger Station, Parkdale*

- Introductions and overview of the certification pilot study process – Ferrucci and Hrubes
- Welcome and overview of the Hood River and Barlow RDs – Daina Bambe, Hood River District Ranger and Acting Barlow District Ranger
- Presentation of Eastside Programs - management issues unique to the Hood River and Barlow RDs: fire, forest health, invasive noxious weeds, range allotments, restoration.

10:15-4:00pm *Field Tours*

**North Tour – Forest Health, Grazing, Invasive Plants, Salvage Logging**

**Audit team present:** Hrubes, Vesely, Perry, Spitz, Steer

**FS personnel:** Fissell, Smolt, MacDonald, Shelby, Dryden, Morgan, Lankford, O'Connor, Kreiter, Lankford, Rice.

*Tap Salvage (Unit 3).* Categorical exclusion harvest completed last December (unit is part of a larger, 62-acre project). Fourteen acres of dead lodgepole pine and mistletoe infected Douglas-fir were harvested; all western larch and healthy trees over 15" dbh were left. Topics: diameter prescriptions, categorical exclusion biological evaluations, Categorical Exclusion (CE) availability to public.

*Cub Commercial Thin.* Visited a 2004 commercial thin which was part of a larger 69-acre project. Area was planted 40 years ago with off-site pine which was poorly performing; drought and overstocking had made all species present susceptible to insects and root diseases. A temporary haul road was constructed to avoid disturbing the existing road, which had become nesting/roosting/foraging habitat for owls since the last entry. Topics: seed sources and the MTHNF genetic tree improvement program, management in LSRs, categorical exclusions.

*8 Mile Salvage.* Proposed 220-acre salvage project within the Surveyor's Ridge LSR, currently being litigated by Bark. The categorical exclusion's objectives are to salvage dead lodgepole and fir and to restore habitat in the long-term by planting tree species less susceptible to bark beetle infestations. Recreation trails in the area will be buffered 75 feet. Topics: CEs, salvage logging, forest health.

*West 5 Mile Timber Sale.* Project to remove dead/dying and poorly formed trees from a matrix stand with ~300 year old remnant ponderosa pine (previously unentered). Harvesting occurred in 2006, and will move the area toward the desired future condition of better stand health, reducing ladder fuels, and promoting the desired species composition. Topics: converting Type II old growth to Type III, contract administration, Northwest Forest Plan versus Eastside Screen requirements.

*Long Prairie Grazing Allotment.* Visited one of the five grazing allotments on the MTHNF. Long Prairie covers 5,700 acres and has supported grazing since 1906. An EA was done last year, and an alternative was recently selected that will allow 52 cow/calf pairs (roughly half of capacity) to graze between June 15-September 30. Since the permittee has opted for non-

use until 2008, the FS will complete other project tasks in the meantime such as mitigation measures related to noxious weeds, and a new fence in collaboration with CTWS and Americorps. Topics: range allotments on the MTHNF, cultural sites and collaboration with CTWS, noxious weeds.

**South Tour – Fire/Fuels, Tribal, Special Forest Products, OHV**

**Audit team present:** Ferrucci, Kusel

**FS personnel:** Slagle, Weiss, Black, Thurman, Sonnabend, Rossel, Dodd, Rector, Kain

*Teacup Lake Warming Cabin.* Visited a 20' x 30' warming cabin constructed in collaboration with the Oregon Nordic Club. The cabin is located near Highway 35 near the ONC groomed track system, and was constructed on an area that had been used as a log landing over 25 years ago. The FS also collaborated with US Fish and Wildlife to select the best location for the shelter with the least impact to hydrologic resources and spotted owl habitat. Topics: recreation, consultation, and partnerships.

*Sportsman Park Hazardous Fuels Reduction Project.* The Sportsman Park area is home to more than 200 year round residents and is surrounded by FS land. Wasco County has done a Community Wildfire Protection Plan that identified the area as a Wildland Urban Interface; the community has engaged the FS in a collaborative effort to reduce fuels and fire hazard. There is a project in the works to carry out mechanical treatments on 905 acres and to underburn 1520 acres. Topics: Collaboration, special forest products, wildland-urban interfaces, stewardship contracts.

*Bear Knoll Timber Sale.* The objective of the Bear Knoll sale was to thin overstocked stands (400-600 trees per acre [tpa]) that were growing slowly, as well as to provide stability to local and regional economies. Topics: tribal consultation, appeal process, eastside overstocking.

*Precommercial Thinning Program.* The Hood River and Barlow Ranger Districts precommercial thin 200-900 acres per year, depending on the availability of funding. The goal is to improve forest health in young stands and grow bigger trees at an accelerated rate. Focus is on trees greater than 12" height, and less than 6" dbh. Work is done through annual contracts – one was recently awarded to CTWS. Topics: Funding, tribal contracts, precommercial thinning on MTHNF.

*4:30 – Travel back from Parkdale to Sandy*

**Thursday, September 21**

*MTHNF Supervisor's Office – Sandy*

The audit team sequestered to deliberate and ascertain MTHNF conformance to the Pacific Coast Regional Standard as well as to the Additional Considerations for National Forests.

**Friday, September 22**

*MTHNF Supervisor's Office – Sandy*

*Morning* – Conclusion of deliberations by the audit team.

*Afternoon* – Closing Meeting. Review of findings; MTHNF strengths and weaknesses in relation to the standard, and areas of non-conformance.

**Full audit team present**

**FS personnel present:**

Jim Tierney	Gary Larsen	Nancy Lankford
Jeanne Rice	Jim Rice	Dan Shively
KJ Silverman	Andrei Rykoff	Deb Roy
Doug MacCleery	Lisa Norris	Jennie O'Connor
Daina Bambe	Ray Weiss	

### 3.3.2 Stakeholder Consultation

Pursuant to SCS protocols, consultations with key stakeholders were an integral component of the evaluation process. Consultation took place prior to, concurrent with, and following the field evaluation. The following were distinct purposes of the consultations:

- To solicit input from key stakeholders as to the applicability of the National Forest Additional Considerations developed as part of this project (see section 2.0).
- To solicit input from affected parties as to the strengths and weaknesses of the Forest Service's management, relative to the standard, and the nature of the interaction between the agency and the surrounding communities.
- To solicit input on whether the Forest Service consulted with stakeholders regarding identifying possible high conservation value forest areas within MTHNF.

Principal stakeholder groups of relevance to this evaluation were identified based upon results from the scoping evaluation, lists of stakeholders provided by MTHNF, and additional stakeholder contacts from other sources (e.g., regional FSC working group). The following types of groups and individuals were determined to be principal stakeholders:

- Current and former Forest Service/MTHNF employees, including headquarters and field
- Contractors
- Lease holders
- Adjacent property owners
- Pertinent tribal members and or representatives
- Members of the Pacific Coast FSC Working Group and FSC-US
- FSC International
- Local and regionally-based environmental organizations and conservationists
- Local and regionally-based social interest organizations
- Forest industry groups and organizations

- Adjacent counties and watershed groups
- Purchasers of logs harvested on the MTHNF
- State and Federal regulatory agency personnel
- User groups, such as hunters, all terrain vehicle (ATV) users, and others
- Other relevant groups

A list of stakeholders contacted as part of this evaluation is included in Appendix 3 of this report.

After relevant stakeholders were identified, their input was gathered through several distinct methods, including:

- A public notification of the evaluation, invitation for comment, and receipt of written comments
- A public meeting held at the Supervisor’s Office in Sandy the first night of the evaluation
- A meeting in Portland with environmental community stakeholders
- In-person and phone interviews with available stakeholders

### 3.3.2.1 Summary of Stakeholder Concerns and Perspectives and Responses from the Team Where Applicable

Shown below is a summary of the major perspectives and concerns expressed by the stakeholders that were consulted during the course of this evaluation (CAR: Corrective Action Request; REC: Recommendation).

#### Economic

Comment/Concern	Response
<ul style="list-style-type: none"> <li>• Not enough timber harvest or restoration thinning offered to wood products industry; concern in loss of jobs, infrastructure, and way of life</li> </ul>	Comment duly noted. See REC 2006.12
<ul style="list-style-type: none"> <li>• Insufficient funds to properly manage the Forest. This affects ecological and economic sustainability</li> </ul>	The audit team agrees with the significance of this issue; see Major CAR 2006.2
<ul style="list-style-type: none"> <li>• The timber program subsidized much of the other work. Now that timber program is severely cut, no funds to manage anything else</li> </ul>	See CAR 2006.2
<ul style="list-style-type: none"> <li>• Forest Service basing management on ‘lowest hanging fruit’ rather than what makes most strategic sense</li> </ul>	Comment duly noted
<ul style="list-style-type: none"> <li>• Forest Service not implementing their Forest Plan; should be and could be harvesting more timber, but not doing so due to lack of leadership</li> </ul>	See CAR 2006.2
<ul style="list-style-type: none"> <li>• Harvest costs are extremely high on federal</li> </ul>	Comment duly noted;

lands because of all the restrictions	the audit team notes that harvest costs are largely driven by statutory environmental protection mandates; we also note that the FSC standard expects that externalities are internalized into the purchase price.
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### Social

<b>Comment/Concern</b>	<b>Response</b>
<ul style="list-style-type: none"> <li>• Fire hazards (community safety) due to inability to treat acres for fuels reduction</li> </ul>	Duly noted; see REC 2006.10
<ul style="list-style-type: none"> <li>• Strong relation with Confederated Tribes of Warm Springs</li> </ul>	Duly noted, particularly in the contexts of FSC Principle 3
<ul style="list-style-type: none"> <li>• Increasing use of collaborative process</li> <li>• Strong partnerships</li> <li>• Some of the collaboration is still ‘token’</li> <li>• Positive relations with recreation permittees</li> <li>• Landowners adjacent to forest concerned with spillover fires and invasive exotic weeds</li> </ul>	Duly noted, particularly in the context of FSC Principles 2, 4 & 5

### Environmental

<b>Comment/Concern</b>	<b>Response</b>
<ul style="list-style-type: none"> <li>• Recreation poorly managed; great resource damage; OHV use is a huge problem</li> </ul>	This subject matter was extensively examined during the evaluation; see CAR 2006.6
<ul style="list-style-type: none"> <li>• Relations between ski area and forest are negatively affecting environment; “the Forest Service has the responsibility to keep the ski resorts financially successful”</li> </ul>	Comment duly noted; see CAR 2006.15
<ul style="list-style-type: none"> <li>• Forest Service is believed to be operating in nonconformance with key legal mandates</li> </ul>	The audit team uncovered no evidence that MTHNF managers are operating in contravention with applicable legal requirements.
<ul style="list-style-type: none"> <li>• Huge backlog in road, weed, other restoration and maintenance needs</li> </ul>	See Major CAR 2006.2
<ul style="list-style-type: none"> <li>• Environmental degradation is resulting from timber sales, salvage, thinnings</li> </ul>	See CAR 2006.4

<ul style="list-style-type: none"> <li>• Implications of not harvesting more intensively include: wildfires, erosion, reforestation backlog, adjacent landowners dealing with spillover problems.</li> </ul>	Duly noted, see Minor CAR 2006.7
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### 3.4 Total Time Spent on Evaluation

Time spent by the Audit Team on the simulated audit, including the preliminary evaluation, audit preparation, document review, stakeholder consultation, staff interviews, field inspections, deliberations and report writing totaled roughly 60 person-days.

### 3.5 Process of Determining Conformance

In official audits, FSC accredited forest stewardship standards consist of a three-level hierarchy: 10 Principles, 56 Criteria that elaborate upon the Principles, and numerous Regional Indicators that provide regionally-specific elaboration of each Criterion. Consistent with SCS Forest Conservation Program evaluation protocols, the team collectively determines whether or not the subject forest management operation is in conformance with every applicable Regional Indicator of the relevant forest stewardship standard.<sup>5</sup> Each non-conformance must be evaluated to determine whether it constitutes a major or minor non-conformance at the level of the associated criterion or sub-criterion. Not all Indicators are equally important, and there is no simple numerical formula to determine whether an operation is in non-conformance. The team must use their collective judgment to assess each Criterion to determine conformance. If the forest management operation is determined to be in non-conformance at the Criterion level, then at least one of the Indicators must be classified as a major non-conformance.

Corrective action requests (CARs) are issued for every instance of non-conformance. Major non-conformances trigger Major CARs and minor non-conformances trigger Minor CARs. For this simulated audit, there was no expectation that non-conformances discovered would be addressed by the Mt. Hood National Forest.

#### *Interpretations of Major CARs (Preconditions), Minor CARs and Recommendations*

*Major CARs/Preconditions:* Major non-conformances, either alone or in combination with non-conformances of other indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant FSC Criterion given the uniqueness and fragility of each forest resource. These are corrective actions that must be resolved or closed out prior to award of the certificate. If major CARs arise after an operation is certified, the timeframe for correcting these non-conformances is typically shorter than for minor CARs. Certification is contingent on the certified operations response to the CAR within the stipulated time frame.

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<sup>5</sup> For this evaluation, the audit team determined that Principle 10 was not applicable because the management regimes employed on Mt. Hood National Forest do not constitute “plantation forest management” as defined by the FSC.

*Minor CARs:* These are corrective action requests in response to minor non-conformances, which are typically limited in scale or can be characterized as an unusual lapse in the system. Corrective actions must be closed out within a specified time period of award of the certificate.

*Recommendations:* These are non-binding suggestions or “opportunities for improvement” that the audit team concludes would help the subject forest management operation even a higher level of conformance to the certification standard above the threshold required to achieve certification. Action on the recommendations is voluntary and does not affect the maintenance of the certificate. Recommendations can be changed to CARs if performance with respect to the Criterion triggering the recommendation falls into non-conformance, as determined through subsequent surveillance audits.

## **4.0 RESULTS OF THE EVALUATION**

Table 4.1 below contains the evaluation team’s findings as to the strengths and weaknesses of the Forest Service’s management of MTHNF relative to the FSC Pacific Coast Regional Standard, and to the Additional Considerations for National Forests. The table also presents CAR numbers related to each principle.

**Table 4.1 Notable strengths and weaknesses of the forest management enterprise relative to the P&C**

Principle/Subject Area	Strengths Relative to the Standard	Weaknesses Relative to the Standard	CAR/REC #s
<b>P1: FSC Commitment and Legal Compliance</b>	<ul style="list-style-type: none"> <li>▪ Forest managers express a strong commitment to complying with laws/regulations - lawsuits help define/interpret the decision space for these statutes and the MTHNF managers are committed to managing within that defined decision space</li> <li>▪ MTHNF managers go above and beyond NEPA requirements and basic sharing of information through its work with partners. They have engaged diverse stakeholders and have in a number of instances worked in the field to share plans and modify them in response to stakeholder concerns. In many instances, their procedures for public participation exceed required legal obligations.</li> <li>▪ The Forest Service has been proactive with its treaty obligations, especially through its advancement of a Mt. Hood-Confederated Tribes of Warm Springs partnership.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The Forest Service has not yet provided a written statement of commitment to the FSC Principles and Criteria and such a statement of commitment is not yet incorporated into the MTHNF Forest Plan or another official document. In addition, if actual certification were sought, the Forest Service would need to document the reasons for seeking partial certification (if only some National Forests sought certification).</li> <li>▪ The Forest Service has not adopted and memorialized a policy assuring that when conflicts arise between U.S. law and FSC Principles and Criteria (P&amp;C) that such conflicts will be referred to the FSC for resolution.</li> <li>▪ Though it is not yet an acute problem, OHV use levels are on the rise, as are other unauthorized activities.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Major CAR 2006.1</li> <li>▪ CAR 2006.5</li> <li>▪ REC 2006.1</li> </ul>

<b>P2: Tenure &amp; Use Rights &amp; Responsibilities</b>	<ul style="list-style-type: none"> <li>▪ Timber sale perimeters are clearly marked; the same is true for sales adjacent to the Forest boundary</li> <li>▪ Legal tenure claims to the land are not in doubt.</li> <li>• The FS affirmatively allows for customary uses</li> <li>• Recreation, Non-timber Forest Products (NTFP) gathering, Tribal customary uses are all respected</li> <li>▪ There is a demonstrated sense of responsibility with regard to historic and cultural resources</li> <li>▪ There is extensive consultation with stakeholders through NEPA (excluding CE process) and through other partnership and consultative processes</li> <li>▪ The FS has formed many working partnerships with local groups; there is a good understanding of what collaboration is and how it might be improved</li> </ul>	<ul style="list-style-type: none"> <li>▪ Huckleberry gathering is an important tribal use on the Forest and MTHNF managers have pursued informal strategies for providing for this customary use but there is acknowledged uncertainty as to whether or not tribal gathering can be assured through a formal designation/reservation.</li> </ul>	<ul style="list-style-type: none"> <li>▪ REC 2006.2</li> </ul>
<b>P3: Indigenous Peoples' Rights</b>	<ul style="list-style-type: none"> <li>▪ The MTHNF is exceptional in its advancement of government-to-government tribal relations through direct work with the Tribes and through its partnering process, which includes sending employees to tribal cultural educational workshops</li> <li>▪ There is a program of strong, affirmative contact, outreach, and joint project work with CTWS at all levels</li> <li>▪ FS and CTWS representatives meet quarterly</li> <li>▪ There is a Memorandum of Understanding (MOU) at the government-to-government level (MTHNF to CTWS).</li> <li>• Generally, MTHNF ensures that tribal resources are protected from adverse management effects</li> <li>▪ The agency is working to establish a ten-year stewardship project with the CTWS.</li> <li>▪ FS employees are respectful of tribal knowledge and confidentiality (example: huckleberry map)</li> <li>▪ The Mt. Hood NF also coordinates on strategic efforts with the Columbia River Inter-tribal Fish Commission (CRITFC). This is a coalition of ALL Northwest Oregon &amp; Washington tribes.</li> </ul>	<ul style="list-style-type: none"> <li>▪ At present, MTHNF managers seek nation-to-nation interaction only with neighboring tribes now based in Oregon</li> </ul>	<ul style="list-style-type: none"> <li>▪ REC 2006.3</li> </ul>

<p><b>P4: Community Relations &amp; Workers' Rights</b></p>	<ul style="list-style-type: none"> <li>• The general view amongst employees that were interviewed is that the Mt. Hood National Forest is an excellent employer: management is responsive to employee issues and understands the challenges for employees in light of budget limitations</li> <li>• Stewardship contracts/partnership approaches create opportunities for increasing contact with constituents ,and blend production of resource commodities and land stewardship in positive ways.</li> <li>• Contractors were pleased that stewardship contracts have been handled/managed well</li> <li>• Forest work is also established in part through collaborative processes which reduces conflict and increases cooperation</li> <li>• Non-supervisory FS employees have the right to organize</li> <li>• Safety is emphasized as well as adherence to OSHA requirements</li> <li>• Daily safety briefings are held prior to field visits</li> <li>• The Mt. Hood National Forest has developed a number of partnership and collaborative ventures that offer opportunities for individuals and stakeholder groups to provide input and even participate in management above and beyond NEPA requirements</li> </ul>	<ul style="list-style-type: none"> <li>▪ Greater attention could be paid to capacities and training needs associated with contractors that perform services on the Forest</li> </ul>	<ul style="list-style-type: none"> <li>▪ REC 2006.4</li> <li>▪ REC 2006.5</li> <li>▪ REC 2006.6</li> </ul>
<p><b>P5: Benefits from the Forest</b></p>	<ul style="list-style-type: none"> <li>• The Forest Service is not engaged in activities driven by an immediate need for revenue generation that compromise long-term forest resource considerations.</li> <li>• There is an de facto preference for local processing of logs, as these mostly low-value logs can't be economically hauled far</li> <li>• There are Small Business Association (SBA) timber sales, but all active qualified bidders meet requirements</li> <li>• Special forest products permits are small enough to facilitate the entrance of new, small businesses</li> <li>• The probable sale quantity (allowed) is 64 MMBF; actual harvests are in the range of 25-30 MMBF</li> </ul>	<ul style="list-style-type: none"> <li>▪ Due to ongoing and substantial budget reductions, the managers of the MTHNF are not able to demonstrate that they are financially able to support long-term forest management and restoration, including planning, inventory, resource protection and post-harvest management activities at a level that assures full and continuing conformance with the FSC certification standards. This is a situation that pertains to all units of the National Forest System, not just Mt. Hood.</li> <li>▪ Harvest levels on the MTHNF are presently insufficient for assuring that managed stands (i.e., those stands allocated to active management) are being kept from over-stocked conditions; there are large extents of overstocked stands on the MTHNF.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Major CAR 2006.2</li> <li>▪ CAR 2006.6</li> <li>▪ CAR 2006.7</li> </ul>

<p><b>P6: Environmental Impact</b></p>	<ul style="list-style-type: none"> <li>• Roughly 20 different watershed analyses have been done for the whole forest; each of which cover all of these topics, and require the participation of botanists, wildlife biologists, fisheries biologists, soil scientists, hydrologists, etc.</li> <li>• Fire regime condition classes have been mapped for the entire region</li> <li>• Separate analyses have been done for all Late Successional Reserves (LSRs), which feed into analyses for NEPA. NEPA also requires specialists/experts in these areas on a project level basis.</li> <li>• Additional assessments have been completed for individual Late Successional Reserves (LSRs).</li> <li>• Roughly 70% of the forest is excluded from timber harvesting and is either de-facto or officially designated conservation zones</li> <li>• Even in matrix lands, regeneration treatments require 15% retention (10% in clumps, 5% scattered)</li> <li>• Protection buffers are established around selected species locations under the “Survey and Manage” program.</li> <li>• The NEPA process is based upon a formal evaluation of potential environmental impacts (EA/EIS)</li> <li>• The Forest Service manages the MTHNF for a wide range of native species, habitats, stand types, etc.</li> <li>• The Forest Service was fully forthright in discussing old growth policies and management with the auditor team during the field evaluation..</li> <li>• MTHNF has been mapped for landslide hazard as part of the watershed analyses</li> <li>• If an area is mapped as High Landslide Hazard, MTHNF does not perform any harvesting/road construction.</li> <li>• MTHNF places a strong emphasis on aquatic recovery</li> <li>• The MTHNF has a network of riparian reserves/buffers required by the Northwest Forest Plan</li> <li>• Priority fish habitats, like the Hood River Basin have their own aquatic habitat restoration plan</li> </ul>	<ul style="list-style-type: none"> <li>▪ The Forest Service’s green-up requirements for adjacent clearcuts (tied to 4.5 feet of stand height) does not comply with the green-up requirement of 7 feet in the FSC Pacific Coast Standard.</li> <li>▪ A sample-based review of partial harvest operations on the MTHNF leads the audit team to conclude that residual stand damage is not minimized and that there are opportunities to further reduce the damage level.</li> <li>▪ Presently, roughly 50% of the road network on MTHNF is not needed to support management activities and public access needs on the Forest. Because of budget reductions that have, among other things, resulted in the elimination of the Forest road maintenance crew, the overall level of road maintenance effort is insufficient to keep the road network in good condition. There is, as yet, no completed road management plan for the Forest.</li> <li>▪ Control of access to temporary and permanent roads on the MTHNF is presently not adequate in terms of the objective of minimizing impacts to soil and biota while allowing legitimate public access. There is a growing problem associated with unauthorized OHV/ATV use on the Forest.</li> <li>▪ With respect to management of old growth, management practices on MTHNF comply with the Northwest Forest Plan, but the NWFP standards and guidelines do not comply with the FSC Pacific Coast Regional Standard, leading unavoidably to a finding of non-conformity to the certification standard.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Major CAR 2006.2</li> <li>▪ CAR 2006.8</li> <li>▪ CAR 2006.9</li> <li>▪ CAR 2006.10</li> <li>▪ CAR 2006.11</li> <li>▪ CAR 2006.12</li> <li>▪ CAR 2006.13</li> <li>▪ CAR 2006.14</li> <li>▪ CAR 2006.15</li> <li>▪ REC 2006.7</li> <li>▪ REC 2006.8</li> <li>▪ REC 2006.9</li> <li>▪ REC 2006.10</li> <li>▪ REC 2006.11</li> </ul>
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<b>P7: Management Plan</b>	<ul style="list-style-type: none"> <li>▪ Collectively, the MTHNF “management plan” incorporates many planning documents, including: <ul style="list-style-type: none"> <li>• MTHNF Forest Plan</li> <li>• Northwest Forest Plan (NWFP)</li> <li>• Watershed Assessments</li> <li>• Project planning</li> <li>• Reconciliation Document (MTHNF &amp; NWFP)</li> </ul> </li> <li>• Clear goals, objectives, and desired future conditions are found in the MTHNF Forest Plan, Watershed analyses, and the Northwest Forest Plan</li> <li>• There are have been 15 amendments to the MTHNF Forest Plan</li> <li>• MTHNF is starting the process now of updating their entire Forest Plan, with a planned completion in 2011.</li> </ul>	<ul style="list-style-type: none"> <li>▪ The forest plan itself is out of date. Some critical issues have not been adequately addressed by planning documents; e.g. roads (need Transportation Management Plan) and other rapidly changing issues such as OHV management.</li> </ul>	<ul style="list-style-type: none"> <li>▪ CAR 2006.16</li> </ul>
<b>P8: Monitoring &amp; Assessment</b>	<ul style="list-style-type: none"> <li>• MTHNF produces an annual Monitoring and Evaluation Report which tracks implementation of the Forest Plan.</li> <li>• As a pilot forest under the LUCID initiative, MTHNF’s overall level of systematic monitoring—and reporting thereof—is quite exemplary</li> <li>• Monitoring of noxious weeds led to the development of the <i>DRAFT EIS for Site Specific Invasive Plant Treatments</i>: <a href="http://www.fs.fed.us/r6/mthood/projects/">http://www.fs.fed.us/r6/mthood/projects/</a>. This was in the comment period at the time of the evaluation. If adopted it will become Forest Plan Amendment #16</li> </ul>	<ul style="list-style-type: none"> <li>▪ At present, there is not a clear demonstration of conformance with the requirement that MTHNF managers periodically monitor and assess changes in major habitat elements and the presence an/or absence of and changes in the occurrence of key wildlife species.</li> <li>▪ The Forest Service has not yet developed a chain of custody control system, including written documentation thereof.</li> </ul>	<ul style="list-style-type: none"> <li>▪ CAR 2006.17</li> <li>▪ REC 2006.12</li> <li>▪ REC 2006.13</li> </ul>

<p><b>P9: Maintenance of High Conservation Value Forest</b></p>	<ul style="list-style-type: none"> <li>• On the basis of the observations gathered during the evaluation, the audit team considers it unlikely that current Forest Service standards and guidelines are resulting in management actions in the field that are threatening high conservation values—with the exception of type 1 and type 2 old growth</li> </ul>	<ul style="list-style-type: none"> <li>▪ As the Forest Service’s planning and management systems were not developed with the FSC Principles &amp; Criteria in mind, managers of the MTHNF do not have a readily available means by which to demonstrate that they are meeting the High Conservation Value Forests (HCVF)-related analytical and consultative requirements found in FSC Principle 9. As such, it is not possible for the audit team nor the public to readily discern if there is adequate conformance with this Principle. That said, development of a “cross-walk” document that demonstrates how various National Forest planning and analysis procedures map over to FSC P9 analytical requirements is something that could be easily done and that in fact has been done by other public forest entities that have undergone the FSC certification process.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Major CAR 2006.4</li> </ul>
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## 4.2 Corrective Action Requests and Recommendations

Recall that the following Corrective Action Requests, both Major and Minor, are written as if this pilot project were a bona fide certification audit, which of course it is not. The logic for stipulating simulated CARs is to provide all interested parties with a better sense of the corrective actions that the Forest Service might need to undertake were an actual certification of MTHNF conducted.

### 4.2.1 Major Corrective Action Requests

Major Corrective Action Requests (also known as pre-conditions) are associated with substantial non-conformances relative to the applicable certification standard. Certification cannot be awarded if open Major CARs exist. For most audits<sup>6</sup>, including such projects as this evaluation of the MTHNF, Major CARs arise under two possible circumstances:

- When the audit team finds inadequate conformance (i.e., non-conformance) at the level of an entire FSC Criterion
- When the audit team finds inadequate conformance (i.e., non-conformance) relative to a “fatal flaw” Indicator; that is, an Indicator for which it is expressly stated in standard that conformance is required for the award of certification.

Four Major CARs were stipulated as a result of the MTHNF evaluation.

<b>Background/Justification:</b> Because this pilot project is not a bona fide certification project, the Forest Service has not provided a written statement of commitment to the FSC Principles and Criteria and such a statement of commitment is not incorporated into the MTHNF Forest Plan or another official document. In addition, if the Forest Service were to seek certification, it would need to document the reasons for seeking partial certification (certification of only some of the National Forests).	
<b>Major CAR 2006.1</b>	Prior to award of certification, the Forest Service must provide a written statement of commitment to the FSC Principles and Criteria and such a statement of commitment must be incorporated into the MTHNF Forest Plan or another official document. Prior to award of certification, the Forest Service must document the reasons for seeking partial certification for only a subset of the National Forests.
Reference	FSC Criterion 1.6, Regional Indicators 1.6.a and 1.6.b.

**Background/Justification:** Within the MTHNF, there are stands meeting the FSC definition of

<sup>6</sup> Per FSC guidance promulgated in April 2005, audits in regions with a duly accredited regional standard, and for which the administrative record clearly demonstrates that the regional standard was developed on the understanding that Principle-level conformance was to be the decision rule for the award of certification, Major CARs are issued when there is a finding of Principle-level rather than Criterion-level non-conformance. But for U.S. National Forests, there is not presently an approved standard so this guidance would not apply; that is, Criterion-level conformance would be the decision rule for award of certification, were a bona fide certification evaluation to be conducted.

Type 1 old growth that are allocated to the “matrix” land allocation, some of which have been subject to timber harvesting up to the present time (under timber sales that were initiated several years ago); furthermore, under current F.S. policies, all old-growth matrix stands are subject to possible harvesting in the future. (The fact that the matrix lands constitute only 17% of the MTHNF does not eliminate this conflict with the FSC Pacific Coast Regional Standard.) Past, current and potential future harvesting in and adjacent to Type 1 stands constitutes non-conformance with fatal flaw indicators 6.3.d.1 and 6.3.d.2. All old-growth stands—even those not subject to previous commercial harvesting—may not meet the FSC definition of Type 1 due to fire exclusion, which has created highly unnatural stand conditions. But eastside old growth harvesting, even if classified as Type 2 stands, probably constitutes non-conformance with fatal flaw indicator 6.3.d.3 if such harvesting downgrades these stands to Type 3 status, which may occur in some instances.

<b>Major CAR 2006.2</b>	Prior to award of certification, the Forest Service will need to review and revise its old-growth management policies to bring them in line with the FSC Pacific Coast Standards, particularly sub-criterion 6.3.d. Specifically, policies and practices must be revised to assure there is no entry into stands that meet the FSC definition of type 1 old growth and that there is no net loss of stands meeting the FSC definition of type 2 and 3 old growth. Documented evidence of the necessary modification of F.S. old-growth policies must be provided to SCS prior to award of certification, and SCS may exercise the option of conducting a special on-site audit to assess the adequacy of the revised policies.
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Reference	FSC Criterion 6.3, Regional Indicators 6.3.d.1, 6.3.d.2, 6.3.d.3.
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**Background/Justification:** The Forest Service has not yet developed a chain of custody control system, including written documentation thereof.

<b>(Major) CAR 2006.3</b>	Prior to award of certification, the Forest Service will need to develop and submit to SCS a written description of the procedures it will employ to trace each category of forest product that it wishes to sell as certified product. The procedure must assure that SCS can readily monitor volumes of forest products harvested and sold, by reasonable time periods such as monthly as well as by purchaser. As part of this procedure, the Forest Service should develop additional written guidance to its purchasers informing them that the certified status of products leaving the MTHNF will be maintained only so long as the purchaser and subsequent purchasers hold their own or covered by another valid FSC Chain of Custody certificate.
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Reference	FSC Criterion 8.3
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**Background/Justification:** The Forest Service managers of the MTHNF do not have a tractable means by which to demonstrate that they are meeting the HCVF-related analytical and consultative requirements found in FSC Principle 9. As such, it is not possible for the audit team nor the public to readily discern if there is adequate conformance with this Principle.

<b>Major CAR 2006.4</b>	Prior to award of certification, the Forest Service must submit to SCS a detailed document that clearly yet concisely “cross walks” the activities
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	undertaken on the MTHNF that demonstrate functional conformance to each of the action requirements found in FSC Criteria 9.1 through 9.4. Where current activities do not adequately address any specific requirement found in these Criteria, the Forest Service must also provide a written action plan for how those gaps will be addressed. Based upon analysis of this action plan, SCS will determine if the follow-up activities must be completed prior to or subsequent to award of certification.
Reference	FSC Principle 9

#### 4.2.2 (Minor) Corrective Action Requests

On the basis of the information gathered and analyzed during the course of the field audit, the SCS audit team concluded that there were 13 non-conformances at the level of specific Regional Indicators. Because these non-conformances are at the Indicator level, the appropriate response is specification of (Minor) Corrective Action Requests.

<b>Background/Justification:</b> The Forest Service has not adopted and memorialized a policy assuring that when conflicts arise between US law and FSC P&C, such conflicts will be referred to the FSC for resolution.	
<b>(Minor) CAR 2006.5</b>	The Forest Service must adopt and memorialize a policy assuring that when conflicts arise between US law and FSC P&C with respect to management of a certified National Forest, such conflicts will be referred to the FSC for resolution.
<b>Time Frame</b>	Within 3 months of award of certification.
<b>Reference</b>	FSC Criterion 1.4, Regional Indicator 1.4.a.

<b>Background/Justification:</b> Due to ongoing and substantial budget reductions, the managers of the MTHNF are not able to demonstrate that they are financially able to support long-term forest management and restoration, including planning, inventory, resource protection and post-harvest management activities at a level that assures full and continuing conformance with the FSC certification standards.	
<b>(Minor) CAR 2006.6</b>	The Forest Service must undertake appropriate budgetary and staffing decisions necessary to reverse the pattern of reduction in resources available to manage the MTHNF in fuller conformance with the Mt. Hood LRMP and the FSC Pacific Coast Regional Standard. At the time of the first surveillance audit, the Forest Service will need to provide SCS with a status report detailing the actions taken to secure additional funding and the results of those actions.
<b>Time Frame</b>	One year from award of certification
<b>Reference</b>	FSC Criterion 5.1, Regional Indicator 5.1.a.

<b>Background/Justification:</b> Harvest levels on the MTHNF are presently insufficient for assuring that managed stands (i.e., those stands allocated to active management) are not evolving into over-stocked conditions; there are large extents of overstocked stands on the MTHNF.	
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<b>(Minor) CAR 2006.7</b>	The Forest Service must explore and implement strategies for alleviating the extent of overstocked stands on the MTHNF and prepare a briefing report of steps taken by the time of the first annual audit after award of certification.
<b>Time Frame</b>	One year from award of certification.
<b>Reference</b>	FSC Regional Indicator 5.6(c)

**Background/Justification:** The Forest Service’s green-up requirements for adjacent clearcuts (tied to 4.5 feet of stand height) does not comply with the green-up requirement of 7 feet in the FSC Pacific Coast Standard.

<b>(Minor) CAR 2006.8</b>	The Forest Service must modify its adjacent clear cut standard to comply with the 7 foot requirement in the FSC regional standard.
<b>Time Frame</b>	Within 6 months after award of certification.
<b>Reference</b>	FSC Criterion 6.3, Regional Indicator 6.3.f.5.

**Background/Justification:** A sample-based review of partial harvest operations on the MTHNF leads the audit team to conclude that residual stand damage in some harvest units is higher than necessary and that opportunities exist to reduce the level of damage.

<b>(Minor) CAR 2006.9</b>	MTHNF personnel must develop and implement strategies for working with timber purchasers to reduce the level of residual stand damage in partial harvesting operations.
<b>Time Frame</b>	One year after award of certification
<b>Reference</b>	FSC Criterion 6.5, Regional Indicator 6.5.b

**Background/Justification:** Presently, roughly 50% of the road network on MTHNF is not needed to support management activities and public access needs on the forest. Because of budget reductions that have, among other things, resulted in the elimination of the Forest road maintenance crew, the overall level of road maintenance effort is insufficient to keep the road network in good condition. There is, as yet, no completed road management plan for the Forest.

<b>(Minor) CAR 2006.10</b>	MTHNF managers must complete the road management plan for the Forest. The road plan must provide priorities for road closures and road maintenance in light of available budgets. Additionally, MTHNF managers must demonstrate that they have pursued new and more assertive strategies for securing additional funding to support management of the road system on the Forest.
<b>Time Frame</b>	By the time of the first annual audit after award of certification.
<b>Reference</b>	FSC Criterion 6.5, Regional Indicator 6.5.g.

**Background/Justification:** Control of access to temporary and permanent roads on the MTHNF is presently inadequate in regards to minimizing impacts to soil and biota, while allowing legitimate public access. There is a growing problem associated with unauthorized ORV/ATV use on the Forest.

<b>(Minor) CAR 2006.11</b>	As part of the road management plan that is addressed in CAR 2006.5, MTHNF managers must assure that management of ORV/ATV is substantively incorporated and that designation of which roads and trails on the Forest are to be open to ORV/ATV use is finalized.
<b>Time Frame</b>	By the time of the first annual audit after award of certification.
<b>Reference</b>	FSC Criterion 6.5, Regional Indicator 6.5.i.

**Background/Justification:** Inadequate budgets and resources are devoted to road surface maintenance, resulting in unnecessary levels of roadway erosion.

<b>(Minor) CAR 2006.12</b>	As part of the road management plan addressed in CAR 2006.10, MTHNF managers must demonstrate significant progress in securing additional funds earmarked for road surface maintenance (e.g., periodic grading of dirt roads).
<b>Time Frame</b>	By the time of the first annual audit after award of certification.
<b>Reference</b>	FSC Criterion 6.5, Regional Indicator 6.5.j

**Background/Justification:** The Forest Service has not closed all unnecessary roads on the Forest.

<b>(Minor) CAR 2006.13</b>	As part of the road management plan that is the subject of CAR 2006.10, MTHNF managers must develop a prioritized plan, including funding, to close unnecessary roads on the Forest.
<b>Time Frame</b>	By the time of the first annual audit after award of certification.
<b>Reference</b>	FSC Criterion 6.5, Regional Indicator 6.5.l

**Background/Justification:** Though chemical use is relatively limited on MTHNF, Forest managers have not put a policy/plan in place to further reduce use of chemical pesticides over time. MTHNF has not documented a policy to not use chemicals on or proposed for inclusion on the FSC prohibited list. Two such prohibited chemicals, dicamba and strychnine, are in use on the Forest.

<b>(Minor) CAR 2006.14</b>	A policy must be developed and put in place that commits MTHNF managers to actively seek means of further reducing chemical use over time and to immediately cease use of any chemical on the FSC prohibited chemical list.
<b>Time Frame</b>	Three months after award of certification.
<b>Reference</b>	FSC Criterion 6.6, Regional Indicator 6.6.a.

**Background/Justification:** Albeit a small number of acres, portions of the MTHNF are being converted from natural forest cover for human development (ski areas). Per FSC Criterion 6.10, such conversions must be limited to a small amount of the total FMU, must not entail loss of HCVF, and must contribute to larger conservation objectives. The Forest Service has yet to adequately articulate how receipts from such land use conversions are reinvested in a manner that demonstrates conformance to the third requirement.

<b>(Minor) CAR 2006.15</b>	The Forest Service must prepare a memorandum/justification that explains how at least a significant portion of the receipts generated from the ski areas, including the additional receipts anticipated from the current ski area expansion, are utilized to achieve conservation benefits on the Forest.
<b>Time Frame</b>	Three months after award of certification
<b>Reference</b>	FSC Criterion 6.10

**Background/Justification:** FSC Regional Indicator 7.2.a. requires that the relevant provisions of the management plan are modified/updated at least every 10 years; the revisions/updates should incorporate results of periodic monitoring as well as new scientific and technical information. As well, the updates should respond to the effect of illegal/unauthorized activities and changes in the forest caused by natural disturbances. The MTHNF forest plan is out of date. Some critical issues have not been adequately addressed by planning documents; e.g. roads (need Transportation Management Plan) and other rapidly changing issues such as OHV management, though we acknowledge that OHV management will be addressed in the amended forest plan.

<b>(Minor) CAR 2006.16</b>	The Forest Service must take the necessary decisions at the regional level to assure that the MTHNF plan revision is placed at or near the top of the priority queue for funding and implementation. Evidence must be presented to SCS that MTHNF plan revision funding has been secured and that the full complement of staff resources have been committed to the process, such that the plan revision process is completed by the current target date of 2011. Utilizing the MTHNF web site or another appropriate mechanism, the public should be informed of the status of the plan revision process and the commitment to complete the process by the end of 2008.
<b>Time Frame</b>	One year after award of certification
<b>Reference</b>	FSC Criterion 7.2, Regional Indicator 7.2.a.

**Background/Justification:** At present, there is not a clear demonstration of conformance with the requirement that MTHNF managers periodically monitor and assess changes in major habitat elements and the presence and/or absence of and changes in the occurrence of key wildlife species.<sup>7</sup>

<b>(Minor) CAR 2006.17</b>	After internal and external consultation with appropriate experts, the Forest Service must expand the list of species of concern that it will focus on with respect to monitoring the wildlife impacts of management activities within the MTHNF. A briefing report should be prepared for submittal to SCS that provides the rationale for the additional species of concern that are selected, and that provides an overview of the type and design of population monitoring that it will undertake.
<b>Time Frame</b>	One year after award of certification

<sup>7</sup> This finding of a non-conformity is made despite our acknowledgement that district personnel monitor/assess habitat conditions and presence or absence of TES & MIS species as part of project (NEPA) planning. Notably, Regional Indicator 8.2.c.1 requires a focus on all species, not just "listed" species.

<b>Reference</b>	FSC Criterion 8.2.c, Regional Indicator 8.2.c.1
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### 4.2.3 Recommendations

Note: Recommendations are non-binding opportunities for improvement that are noted by the audit team during the course of a certification audit.

<b>Background/Justification:</b> Though it is not yet an acute problem, ORV use is on the rise, as are other unauthorized activities.	
<b>REC 2006.1</b>	MTHNF managers should explore and pursue funding and other resource allocation strategies that will lead to an enhanced organizational capacity to control unauthorized ORV use, before the problem rises to a level of non-conformance with Criterion 1.5. Ladee Flat is an example of where unauthorized use is approaching levels that will lead to a non-conformance in the absence of heightened management control.
<b>Reference</b>	FSC Criterion 1.5

<b>Background/Justification:</b> Huckleberry gathering is an important tribal use on the Forest, and MTHNF managers have pursued various strategies for providing for this customary use. However, there is acknowledged uncertainty as to whether tribal gathering can be assured through a formal designation/reservation.	
<b>REC 2006.2</b>	MTHNF managers should seek clarification as to whether or not F.S. policies enable the formal designation of exclusive tribal use areas for huckleberry gathering.
<b>Reference</b>	FSC Criterion 2.1, Regional Indicator 2.1.a.

<b>Background/Justification:</b> At present, MTHNF managers seek nation-to-nation interaction only with neighboring tribes now based in Oregon.	
<b>REC 2006.3</b>	MTHNF managers should explore interests on the part of other nearby tribes or those with historic ranges in or near MTHNF (e.g. the Yakama and Grand Ronde tribes) to determine tribal interest in having more interaction and information exchange in Mt. Hood discussions/management. Such interaction should build upon ongoing strategic efforts with the Columbia River Inter-Tribal Fish Commission, a coalition of all NW Oregon and Washington Tribes.
<b>Reference</b>	FSC Criterion 3.2., Regional Indicator 3.2.a.

<b>Background/Justification:</b> Greater attention could be paid to capacities and training needs associated with contractors that perform services on the Forest. The Forest Service should not assume that all responsibilities beyond immediate worksite safety will be borne by the Department of Labor, as is generally the practice.	
<b>REC 2006.4</b>	MTHNF managers should perform a local workforce assessment for both contractors & subcontractors, to allow the FS to gain a better

	understanding of local capacities, equipment available, interests, training needs, etc.
<b>Reference</b>	FSC Criterion 4.1, Regional Indicators 4.1.b & d.

**Background/Justification:** While MTHNF managers have always paid attention to contractor issues for subcontractors operating on the Forest, the recent incidents in other forests and with various labor contractors, especially with respect to transportation safety, underscores the need to ramp up the needed level of oversight.

<b>REC 2006.5</b>	MTHNF managers should support the national directive to assure that subcontractor laborers are in fact being fairly paid and that they receive all protections—economic and with respect to worker safety—legally afforded to them and appropriate for any entity concerned about the welfare of workers.
<b>Reference</b>	FSC Criterion 4.1, Regional Indicator 4.1.f

**Background/Justification:** Due to the lack of a systematic information collection and recording system, MTHNF managers--as well as owners/managers of contractors operating on the Forest--are not in the position to know of the existence of all actual and potential disputes that may arise.

<b>REC 2006.6</b>	The FS should perform more rigorous information collection in order to ascertain if there are disputes, and the depth of the problem. With respect to contractors, the Forest Service should assure that all contractors have some form of a functional, informal dispute resolution mechanism available both for issues between the contractor and the Forest Service and for issues between contractors and their employees.
<b>Reference</b>	FSC Criterion 4.3, Regional Indicator 4.3.a

**Background/Justification:** Regional Indicator 6.1.b requires the use of available science and expertise to compare current ecological conditions with historical conditions within the landscape context.

<b>REC 2006.7</b>	The Forest Service should consider opportunities to validate key assumptions in their modeling of the historic range of variability (model results should be compared against empirical data).
<b>Reference</b>	FSC Principle 6.1, Regional Indicator 6.1.b.

**Background/Justification:** Many stakeholders erroneously believe that there is no environmental analysis completed in support of actions covered by NEPA categorical exclusions.

<b>REC 2006.8</b>	To dispel misunderstandings, MTHNF should dialogue with stakeholders about the categorical exclusion (CE) process and how they are employed on the MTHNF. The Forest Service should take steps to make sure the public understands that project files for CEs are available for public review.
<b>Reference</b>	FSC Criterion 6.1, Regional Indicator 6.1.e.

<b>Background/Justification:</b> The FSC certification standard expects that management actions lead to an ecologically appropriate array of stand ages and successional stages. On the MTHNF, the extent of early successional forest conditions is on a trajectory to be below levels expected from inherent natural stand dynamics for the ecological types found within the boundaries of the Forest.	
<b>REC 2006.9</b>	MTHNF managers should pursue opportunities for paying more attention to early successional species' habitats. Over the long run, ecologically driven forestry should not just focus on the late successional end of the spectrum.
<b>Reference</b>	FSC Criterion 6.3, Regional Indicator 6.3.a.2. & 3.

<b>Background/Justification:</b> Fire suppression policies on the MTHNF are continuing to result in unnatural stand conditions and are increasing the risks of catastrophic/stand replacing fire events. Natural processes inherent to the site are being altered due to decades-long fire suppression efforts. These trends persist despite the development of Wildland Fire Use Plans and suppression policies that intend to consider natural processes.	
<b>REC 2006.10</b>	The FS is no longer using the "let burn"/prescribed natural fire policy – MTHNF managers should follow through with its designated fire policies in Fire Use Areas
<b>Reference</b>	FSC Criterion 6.3 Regional Indicator 6.3.a.

<b>Background/Justification:</b> Regional Indicator 6.5.u requires that fish passage impediments are removed or modified to permit fish passage as well as other aquatic organisms.	
<b>REC 2006.11</b>	While there has been substantial work done by the Forest Service to permit anadromous fish passage, more information should be collected on the negative effects of restricting resident fish passage (e.g., effects on gene flow).
<b>Reference</b>	FSC Criterion 6.5, Regional Indicator 6.5.u.

<b>Background/Justification:</b> Regional Indicator 8.2.d.3 requires that generation or maintenance of local jobs and public responses to management activities are monitored.	
<b>REC 2006.12</b>	The Forest Service should continue efforts to more actively monitor local job creation. Such efforts should build upon socio-economic monitoring associated with the Northwest Forest Plan.
<b>Reference</b>	FSC Criterion 8.2, Regional Indicator 8.2.d.3.

<b>Background/Justification:</b> FSC Sub-Criterion 8.2. speaks to active monitoring of costs, productivity and efficiency of forest management programs. Like most public forest managers, MTHNF managers tend to place most attention on timber-related income, affording much less attention to non-timber/special forest products. The bough management program and manner of contracting is a particular example of system level inefficiencies.	
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<b>REC 2006.13</b>	MTHNF staff should monitor the NTFP program for efficiency and explore opportunities for capturing more value from current extraction levels of special forest products
<b>Reference</b>	FSC Criterion 8.2 Regional Indicator 8.2.e.1 & 2.

## **5.0 SIMULATED CERTIFICATION DECISION**

### **5.1 Certification Recommendation (Simulated)**

As determined by the full and proper execution of the SCS *Forest Conservation Program* evaluation protocols, the audit team findings mean that FSC-endorsed forest management certification could not be offered to the Forest Service for its management of Mt. Hood National forest until the four Major Corrective Action Requests are closed or until they can be downgraded to Minor Corrective Action Requests on the basis of evidence submitted on the steps taken by the Forest Service in response to these Major CARs. Once the Major CARs have been closed or downgraded, and on the assumption that the Forest Service contractually commits to closing the 13 additional Minor Corrective Action Requests within the stipulated time frames, the audit team findings mean that that FSC-certification could be offered.

## **6.0 SURVEILLANCE EVALUATIONS**

Were, at some point in the future, FSC-endorsed certification to be offered to the USDA Forest Service for its management of Mt. Hood National Forest, surveillance audits would need to take place at least annually to monitor the status of any open corrective action requests and review the continued conformance the FSC Pacific Coast Regional Standards. Given the high profile that any certification of a National Forest unit would no doubt have, we anticipate that there would likely be a special surveillance audit scheduled for sometime within the first 6 months after award of certification, augmenting the normal annual surveillance audits. Public summaries of all surveillance audits would be posted on the SCS website ([www.scs-certified.com](http://www.scs-certified.com)).

## **7.0 SUMMARY OF SCS COMPLAINT INVESTIGATION PROCEDURE**

The following is a summary of the SCS Complaint Investigation Procedure, the full version of the procedure is available from SCS upon request. The SCS Complaint Investigation Procedure is designed for and available to any individual or organization that perceives a stake in the affairs of the SCS Forest Conservation Program and who/that has reason to question either the actions of SCS itself or the actions of a SCS certificate holder.

The SCS Complaint Investigation Procedure is a first-stage forum and mechanism for hopefully resolving issues, thereby avoiding the need to involve the FSC. A complaint may come from either clients (e.g., forestland owner, mill owners, manufacturer or retailer, brokers) or from other parties such as interested stakeholders. To have standing under this Procedure, complaints must be in writing, accompanied by supporting evidence, and submitted within 30 days of the date in which the action triggering the complaint occurred.

The written complaint must:

- Identify and provide contact information for the complainant
- Clearly identify the aggrieved action (date, place, nature of action) and which parties or individuals are associated with the action
- Explain how the action is alleged to violate a FSC requirement, being as specific as possible with respect to the applicable FSC requirement
- In the case of complaints against the actions of a certificate holder, rather than SCS itself, the complainant must also describe efforts taken to resolve the matter directly with the certificate holder
- Propose what actions would, in the opinion of the complainant, rectify the matter.

Written complaints should be submitted to:

Dr. Robert J. Hrubes  
Senior Vice-President  
Scientific Certification Systems  
2200 Powell Street, Suite 725  
Emeryville, California, USA 94608  
Email: [rhrubes@scscertified.com](mailto:rhrubes@scscertified.com)

As detailed in the *SCS-FCP Certification Manual*, investigation of the complaint will be confidentially conducted in a timely manner. As appropriate, corrective and preventive action and resolution of any deficiencies found in products or services shall be taken and documented.

## **SECTION B DETAILED RESULTS OF THE SIMULATED FULL EVALUATION**

### **1.0 DETAILED EVALUATION OF CONFORMANCE**

The findings and observations of the evaluation team are presented in this section, structured according to the 9 applicable FSC Principles. Note: Principle 10 was determined by the audit team to be non-applicable to this forest management operation because the timber management regimes employed on MTHNF clearly meet the FSC's definition of natural forest management. To follow are descriptions of each Principle, Criterion, and Indicator and the team's findings and judgments at the Criterion and Indicator levels.

Note: “C” = Conformance

“NC” = Non-conformance

Requirement	C/NC	Positive Evidence	Negative Evidence
<b>P1 Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.</b>			
<b>C1.1 Forest management shall respect all national and local laws and administrative requirements.</b>	C	<b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b>	
<p>1.1.a. The applicant’s forest management plans and operations in the region demonstrate compliance with federal, state, county, municipal, and tribal laws, as well as case law and regulations.</p> <p><i>For example: Records are on file documenting any instances of violations (whether actual or purported) of any applicable laws and regulations as listed above, including actions that were taken by the forest owner or manager to address these violations.</i></p>	C	<ul style="list-style-type: none"> <li>• Forest managers express a strong commitment to complying with laws/regulations - lawsuits help define/interpret the decision space for these statutes and the MTHNF managers are committed to managing within that defined decision space</li> <li>• Existence of litigation is not prima facie evidence of legal non-compliance</li> <li>• Litigation over thinning is primarily based on procedural grounds, rather than lack of compliance with law, and reflect disagreement. The fact that the agency wins a significant proportion of lawsuits suggests something other than repeated and willful lack of compliance.</li> <li>• Losing a lawsuit can also mean that that the statutory requirements were unclear and required judicial interpretation/guidance; the evaluation revealed no evidence suggesting that MTHNF managers are knowingly violating legal mandates</li> <li>• There might be ambiguity in the law...if there is willful, repeated violation, it would be illegal but that is not the case here</li> <li>• Non-governmental organizations (NGOs) sometimes file law suits on procedural grounds to achieve other objectives (e.g., zero cutting on National Forests)</li> <li>• Native Americans praised efforts of the agency to interact and engage them on a variety of land management issues and actions</li> </ul>	<ul style="list-style-type: none"> <li>• Environmental community perceives the fact that lawsuits are filed &amp; they’re sometimes successful is prima facie evidence that FS is not respecting all laws and requirements.</li> <li>• Concern that there are currently 13 timber sales being litigated</li> <li>• By not harvesting at rates that equal to the amounts of mortality, much less growth, some industry stakeholders felt the agency was not fulfilling its obligation.</li> </ul>
<p>1.1.b. Forestry operations meet or exceed the current state forest-practice regulations, best management practices for forestry, roads, wildlife, and/or water quality that exist within the state(s) or other appropriate jurisdiction(s) in which the operations occur.</p>	C	<ul style="list-style-type: none"> <li>• State regulations do not apply, but there is a set of Oregon Best Management Practices (BMPs) - all of which are met or exceeded in this case</li> <li>• FS has set a higher standard for themselves than private or state forestry</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>1.1.c. Where required by law, forest (<i>see Glossary</i>) owners and managers share public information, provide open records, and conduct procedures for public participation.</p>	C	<ul style="list-style-type: none"> <li>• The NEPA process incorporates public participation</li> <li>• FS is open to sharing information</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

		<ul style="list-style-type: none"> <li>• CE project files are the least accessible, but still available upon request</li> <li>• FOIA provides a clear avenue for public access to information in circumstances where Forest managers initially do not believe that dissemination of certain information is appropriate or necessary</li> <li>• MTHNF managers go above and beyond NEPA requirements and basic sharing of information through its work with partners. They have engaged diverse stakeholders of and have in a number of instances worked in the field to share plans and modify them in response to stakeholder concerns. In many instances, their procedures for public participation exceed required legal obligations.</li> </ul>	
<b>C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.</b>	C	<b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b>	
1.2.a. Taxes on forestland and timber, and other fees related to forest management, are paid in a timely manner and in accordance with federal, state, county, municipal, and tribal laws.	C	<ul style="list-style-type: none"> <li>• County payments, taxes etc. are paid on time</li> </ul>	<ul style="list-style-type: none"> <li>• There have been complaints regarding slow payment of contractor invoices</li> <li>• Central administration has been moved to Albuquerque, which has delayed financial process</li> </ul>
<b>C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.</b>	C	<b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b>	
1.3.a. Forest owners or managers comply with treaties, including those with American Indian tribes, and other international agreements that have been signed by the President of the United States, ratified by the Senate and have entered into force. (Note: see Analysis of US Government Procedures for Abiding with Treaties, FSC-US, 3/10/03)	C	<ul style="list-style-type: none"> <li>• There is compliance with international treaties via compliance with applicable federal laws and regulations</li> <li>• See list and crosswalk at <a href="http://www.fs.fed.us/r6/frewin/projects/cert/fsc1.3treaties.shtml">http://www.fs.fed.us/r6/frewin/projects/cert/fsc1.3treaties.shtml</a></li> <li>• The Forest Service has been proactive with its treaty obligations, especially through its advancement of a Mt. Hood-Confederated Tribes of Warm Springs partnership. See for example the Olallie Butte Forest Health Project which involved federal and Reservation forest health. The MTHNF is a leader among forests in advancing tribal relations work.</li> </ul>	
<b>C1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and by the involved or affected parties.</b>	C	<b>The audit team has found a minor non-conformance that triggers the specification of a Minor CAR. Despite this minor non-conformance, overall conformance to this Criterion is deemed to be adequate. This finding is in large part a reflection of the advisory nature of the Criterion. However, closure of the Minor CAR prior to award of certification is advised.</b>	

1.4.a. Any perceived, possible conflict between US law and FSC P&C shall be referred to FSC ABU.	NC		<ul style="list-style-type: none"> <li>• A policy assuring the resolution of such conflicts does not yet exist—Minor Non-Conformance –</li> <li>• CAR 2006.5</li> </ul>
<b>C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</b>	C	<b>Over the breadth of subject matter covered by this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b>	
1.5.a. Forest owners or managers implement measures to prevent illegal and unauthorized activities in the forest.  <i>For example, efforts may include posting boundary notices, using gates, making periodic inspections, and reporting suspected illegal or unauthorized activities to the proper authorities.</i>	C	<ul style="list-style-type: none"> <li>• The Forest has 3 full-time law enforcement officers on the westside and one on the eastside, who patrol and have the ability to arrest and to issue citations</li> <li>• Contract administrators have some law enforcement training and the ability to issue warning citations</li> <li>• The entire staff is encouraged to watch for and report illegal activities</li> <li>• National forest boundaries and the boundaries of restricted use areas, like wilderness areas and watersheds are generally well marked</li> <li>• Gates, signs, and other notices are apparent throughout the Forest to notify the public about access and use restrictions</li> </ul>	<ul style="list-style-type: none"> <li>• This is a large forest with numerous restrictions to protect water, soils, vegetation, wildlife and other resources. The funding and staffing is not adequate to protect sufficient protection for these resources in all cases</li> <li>• REC 2006.1 (more affirmative management of unauthorized <b>motorized recreational vehicle use</b>)</li> </ul>
<b>C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</b>  <i>Applicability note to Criterion 1.6.: Assessment of this criterion is guided by both FSC Policy and Guidelines: Partial Certification for Large Ownerships (BM19.24, May 2000 available at <a href="http://www.fsc.org/en/whats_new/documents/Docs_cent/2">http://www.fsc.org/en/whats_new/documents/Docs_cent/2</a> and the FSC Guidelines for Certification Bodies FSC STD 20-001 (version 2.1).</i>	NC		The audit team concludes that MTHNF operations are not in conformance with this Criterion. Major CAR 2006.1 has been issued in response to this non-conformance.
1.6.a Forest owners or managers provide written statements of commitment to the FSC Principles and Criteria. The commitment is stated in the management plan [see 7.1], a document prepared for the certification process, or another official document.	NC	•	<ul style="list-style-type: none"> <li>• See Major CAR 2006.1</li> <li>• This is a simulated certification exercise and the Forest Service has not yet committed to the FSC Principles &amp; Criteria. When and if the FS decides to pursue FSC certification, a statement of commitment to the P&amp;C would need to be produced.</li> </ul>
1.6.b Forest owners or managers document the reasons for seeking partial certification.	NC	•	<ul style="list-style-type: none"> <li>• See Major CAR 2006.1</li> <li>• Certification of individual National Forests would be considered partial certification of the National Forest System</li> </ul>
1.6.c Forest owners or managers document strategies and silvicultural treatments for several harvest entries that meet the FSC Principles and Criteria (see Principle 7)	C	<ul style="list-style-type: none"> <li>• The FS does engage in site-specific long-term planning of harvest entries</li> <li>• Management plans and harvesting are in overall conformance with the FSC Principles and Criteria, with the exception of cutting in Type I old-growth (see Criteria 6.3.d)</li> </ul>	•
<b>P2 Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</b>			

<p><b>C2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.</b></p>	C	<p><b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b></p>	
<p>2.1.a. Forest owners or managers make available information on legal and customary rights associated with the forest. These rights include both those held by the party seeking certification and those held by other parties.</p> <p><i>For example, tribal claims to customary uses, non-timber forest products (NTFPs), such as firewood and botanical products, hunting and fishing, and recreational uses, are addressed.</i></p>	C	<ul style="list-style-type: none"> <li>• Legal claims to the land are not in doubt.</li> <li>• The Oregon National Forest was established in 1908; was renamed Mt. Hood National Forest in 1919</li> <li>• The CTWS, by treaty, have the right to gather huckleberries, etc. (customary use)</li> <li>• Other customary rights are explored and developed through partnership work with the Confederated Tribes of Warm Springs, such as advancing management practices that protect biophysical capabilities of the land to produce huckleberries.</li> </ul>	<ul style="list-style-type: none"> <li>• The FS cannot reserve particular areas for specific parties to use, even in the case of CTWS for berry gathering</li> <li>• The FS accommodates this by posting “Please respect” signs for the general public, but the exact legal constraints are not known re: exclusive rights for Tribes</li> <li>• REC 2006.2 (huckleberry management areas dedicated for tribal use)</li> </ul>
<p>2.1.b. Land boundaries are clearly identified on the ground by the forest owner or manager prior to commencement of management activities adjacent to the boundary.</p>	C	<ul style="list-style-type: none"> <li>• Timber sale perimeters are clearly marked; the same is true for sales adjacent to the Forest boundary.</li> </ul>	
<p><b>C2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.</b></p>	C	<p><b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b></p>	
<p>2.2.a. Forest owners or managers allow lawful customary uses of the forest to the extent they are consistent with the conservation of forest resources and the stated objectives in the management plan, and do not present a legal liability.</p> <p><i>Examples of legally recognized rights include:</i></p> <ul style="list-style-type: none"> <li>▪ <i>public rights of way</i></li> <li>▪ <i>public use of water</i></li> <li>▪ <i>established easements</i></li> <li>▪ <i>treaty rights</i></li> </ul>	C	<ul style="list-style-type: none"> <li>• The FS affirmatively allows for customary uses</li> <li>• There has only been one conflict, pertaining to the protection of owl habitat. The Forest Service deferred to the Tribal way of counting owl pairs rather than individuals, and the conflict was resolved.</li> <li>• Public use of water is allowed</li> <li>• Recreation, NTFP gathering, Tribal customary uses are all respected</li> <li>• There is a demonstrated sense of responsibility with regard to historic and cultural resources; partnerships are upheld with the CTWS</li> </ul>	<ul style="list-style-type: none"> <li>• The Forest Service allows bough harvesting and collects a fee through a contracting process that undervalues the resources and, in turn, reduces the amount of bough harvesting.</li> </ul>
<p>2.2.b. The forest owner or manager allows customary and lawful uses of the forest to the extent they are consistent with conservation of the forest resource, forest management objectives, and do not present a legal liability.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> <li>▪ <i>collecting firewood for personal use or sale</i></li> <li>▪ <i>collecting non-timber forest products for personal use or sale</i></li> <li>▪ <i>recreation</i></li> <li>▪ <i>gathering plant materials for traditional cultural purposes by American Indians</i></li> <li>▪ <i>use of water</i></li> <li>▪ <i>hiking, hunting, and fishing on non-posted property</i></li> </ul>	C	<p>Same as above; Indicator 2.2.b. is redundant.</p>	

<ul style="list-style-type: none"> <li>▪ <i>visiting ancestral gravesites</i></li> </ul>			
2.2.c. On ownerships where customary use rights and traditional and cultural areas/sites exist, forest owners or managers consult with stakeholders in the planning and implementation of forest management activities.	C	<ul style="list-style-type: none"> <li>• The MTHNF has significant watershed management responsibilities due to longstanding urban reliance on the forest watersheds and cultivates watershed partnerships for consultative purposes</li> <li>• The Forest Service employs archeologists who contact tribes if any sites of historical significance are found; they send tribes documents when other sites of interest are discovered</li> <li>• The agency is clear about whom to contact despite the many organizations with which it works</li> <li>• There is extensive consultation with stakeholders through NEPA and through other partnership and consultative processes. The consultative process is reduced though not altogether eliminated with a “categorical exclusion” (CE).</li> </ul>	
<b>C2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</b>	C	<b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b>	
2.3.a. The forest owner or manager maintains relations with community stakeholders and/or American Indian groups to identify disputes in their early stages. If disputes arise, the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If negotiation fails, federal, state, local, and/or tribal laws are employed to resolve land tenure ( <i>see Glossary</i> ) claims.	C	<ul style="list-style-type: none"> <li>• The Forest Service has improved its performance in identifying &amp; resolving disputes before they come to a head.</li> <li>• The MTHNF is exceptional in its advancement of government-to-government tribal relations through direct work with the Tribes and through its partnering process, which includes sending employees to tribal cultural educational workshops</li> <li>• The FS has formed many working partnerships with local groups; there is a good understanding of what collaboration is and how it might be improved</li> <li>• District Rangers will modify timber sales prior to their review so as to avoid disputes—they have effectively explored many stakeholder concerns through field tours and discussion</li> </ul>	<ul style="list-style-type: none"> <li>• Several stakeholders indicated that the agency exhibited a lack of communication and clarity when dealing with stakeholder groups; however these issues rarely pertain to land tenure claims and use rights.</li> </ul>
<ul style="list-style-type: none"> <li>▪ 2.3.b. The forest owner or manager provides information regarding disputes over tenure and use rights to the certifying body.</li> </ul>	C	<ul style="list-style-type: none"> <li>• No information in relation to tenure disputes has been withheld from the auditing team.</li> </ul>	
<b>P3The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</b>			
<b>C3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.</b>	N/A	<b>N/A; The scope of the evaluation does not include tribal lands</b>	
3.1.a. Managers of tribal forests secure informed consent regarding forest management activities from tribes or individuals (such as allottees ( <i>see Glossary</i> )) whose forest is being considered for management.	N/A		

3.1.b. When requested to do so by the tribal landowner, forest owners or managers use tribal experience, knowledge, practices, and insights in forest management planning and operations on tribal lands.	N/A		
3.1.c. Areas of restricted access are delineated with the consent of affected tribal people and in accordance with their laws and customs on legally recognized tribal lands and/or customarily used non-tribal.	N/A		
<b>C3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</b>	C	<b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b>	
<p>3.2.a. Forest owners or managers identify and contact American Indian groups that have current legal or customary rights to use the management area.</p> <p>The recommended priority for tribal contacts is:</p> <ol style="list-style-type: none"> <li>1) Tribal government, such as tribal chairpersons of federally recognized tribes and traditional cultural and religious leaders.</li> <li>2) Tribal contact persons identified by tribal governments.</li> <li>3) Representatives of non-recognized tribes or tribal groups with no formal governments.</li> <li>4) Lineal descendants of American Indians with ties to the land.</li> </ol> <p>Unsuccessful attempts to contact tribal representatives are documented.</p>	C	<ul style="list-style-type: none"> <li>• There is a program of strong, affirmative contact, outreach, and joint project work with CTWS at all levels</li> <li>• FS and CTWS representatives meet quarterly</li> <li>• There is a Memorandum of Understanding (MOU) at the government-to-government level (MTHNF to CTWS).</li> <li>• At lower levels in the agency, archeologists and District Rangers have arrangements to interact with their counterparts at CTWS.</li> </ul>	<ul style="list-style-type: none"> <li>• The home range of tribal people in the area includes both sides of the Columbia River. There is an arbitrary division of North and South, and MTHNF has focused its effort on the CTWS.</li> <li>• REC 2006.3 (interaction with the Yakimas)</li> </ul>
3.2.b. Forest owners or managers invite the participation of tribal representatives in jointly planning forestry operations that affect tribal and other American Indian resources.	C	<p>The auditing team felt that by and large, FS collaboration with CTWS was exemplary - there are numerous examples of joint FS/CTWS resource planning:</p> <ul style="list-style-type: none"> <li>• Long Prairie grazing allotment which contained a lithic site, archeologist consulted with CTWS representative</li> <li>• CTWS joined in building a fence at the grazing allotment, assisting in the protection of resources</li> <li>• 1997 Memorandum of Understanding with CTWS for managing Huckleberry resources</li> <li>• 2006 Ollalie Butte Forest Health Project; collaboration on planning and management</li> <li>• Stewardship contracting, some projects planned collaboratively</li> <li>• “First Foods Initiative” – a program through which younger tribe members are educated on traditional methods and locations of food gathering (some traditional areas are within the MTHNF)</li> <li>• Invasive weeds/species strategy being developed.</li> </ul>	
3.2.c. On lands adjacent to tribal lands, and on other lands where operations might affect tribal lands or resources, steps are taken by the forest owner or manager to ensure that tribal resources are protected from adverse effects of management activities.	C	<ul style="list-style-type: none"> <li>• Generally, MTHNF ensures that tribal resources are protected from adverse management effects</li> <li>• There are tenure arrangements on Forest Service land, and the agency has established a ten-year stewardship project with the CTWS.</li> </ul>	<ul style="list-style-type: none"> <li>• There remains a worry by some that overstocked stands/fire exclusion and noxious weeds will affect tribal forest resources (huckleberry presence)</li> </ul>

<p><b>C3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.</b></p>	C	<p><b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b></p>	
<p>3.3.a. Forest owners or managers request the participation of tribal representatives in identifying sites of current or traditional significance within the property proposed for certification.</p> <p><i>For example, areas of special significance may include:</i></p> <ul style="list-style-type: none"> <li>▪ ceremonial, burial, or village sites</li> <li>▪ areas used for hunting, fishing, or trapping</li> <li>▪ current areas used for gathering culturally important or ceremonial materials, such as basket materials, medicinal plants, or plant materials used in dances</li> <li>▪ current areas used for subsistence gathering, such as mushrooms, berries, or acorns</li> </ul>	C	<p>MTHNF staff do request CTWS participation in identifying sites of significance on the Forest. Examples include:</p> <ul style="list-style-type: none"> <li>• Traditional areas for huckleberry gathering</li> <li>• Locating areas for peeling cedar trees (used in basket-making)...this led to joint planning effort, where CTWS representatives were invited out to interpret &amp; protect the resource</li> <li>• Lithic scatter sites located throughout the Forest – no disturbances are allowed</li> </ul>	
<p>3.3.b. Forest owners or managers and tribal representatives jointly develop measures to protect or enhance areas of special significance.</p>	C	<ul style="list-style-type: none"> <li>• Same as for previous indicator.</li> <li>• The Forest Service keeps confidential information about sensitive sites</li> </ul>	
<p>3.3.c. Confidentiality of disclosures is maintained in keeping with applicable laws and requirements of tribal representatives.</p>	C	<ul style="list-style-type: none"> <li>• The FS field staff is quite aware of the importance of maintaining confidentiality with CTWS</li> <li>• The Hood River District Ranger was given a map of huckleberry gathering sites for protection purposes; it is kept in a locked safe</li> </ul>	<ul style="list-style-type: none"> <li>• The Collawash Watershed Analysis had a map of traditional sites (although it was still general)</li> </ul>
<p><b>C3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.</b></p>	C	<p><b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b></p> <ul style="list-style-type: none"> <li>▪ There is no formal payment system, but the Forest Service has established a stewardship contract that allows tribal knowledge to be utilized in managing the land and returning resources to the CTWS.</li> </ul>	
<p>3.4.a. Forest owners or managers respect the confidentiality of tribal knowledge and assist in the protection of tribal intellectual property rights.</p>	C	<ul style="list-style-type: none"> <li>• As stated above, FS employees are respectful of tribal knowledge and confidentiality (example: huckleberry map)</li> </ul>	
<p>3.4.b. A written agreement is reached with individual American Indians and/or tribes prior to commercialization of their indigenous intellectual property, traditional ecological knowledge, and/or forest resources. The individuals and/or tribes are fairly compensated when such commercialization takes place.</p>	N/A	N/A	
<p><b>P4 Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</b></p>			
<p><b>C4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</b></p>	C	<p><b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b></p>	
<p>4.1.a. Forest work is packaged and offered in ways that create a high-quality work environment for employees, contractors, and their</p>	C	<ul style="list-style-type: none"> <li>• The general view amongst employees that were interviewed is that the Mt. Hood National Forest is an</li> </ul>	<ul style="list-style-type: none"> <li>• There is anxiety about both the impact of recent and future budget cuts, and how they will affect the</li> </ul>

<p>employees.</p> <p><i>For example, a high quality work environment may include the following attributes:</i></p> <ul style="list-style-type: none"> <li>▪ <i>employee and contractor relationships that are long term and stable</i></li> <li>▪ <i>a mixture of diverse tasks that require varying levels of skill opportunities for advancement</i></li> <li>▪ <i>a comprehensive package of benefits</i></li> <li>▪ <i>opportunities for employee and contractor participation in decision-making</i></li> <li>▪ <i>forest owners or managers provide and/or support training opportunities for workers to improve their skills</i></li> </ul>		<p>excellent employer: management is responsive to employee issues and understands the challenges for employees in light of budget limitations</p> <ul style="list-style-type: none"> <li>• High morale among employees is apparent</li> <li>• There are opportunities for professional development and training; a diversity of knowledge and breadth of activities</li> <li>• Stewardship contracts/partnership approaches create opportunities for increasing contact with constituents, and blend production of resource commodities and land stewardship in positive ways.</li> <li>• Contractors were pleased that stewardship contracts have been handled/managed well</li> <li>• Forest work is also established in part through collaborative processes which reduces conflict and increases cooperation</li> <li>• Some work by subcontractors is monitored through invoices to check on wages paid to workers</li> </ul>	<p>agency's ability to successfully do its job</p> <ul style="list-style-type: none"> <li>• Even long-time employees are concerned about the security of their jobs</li> <li>• In some cases, employees worry about their ability to do their job well with reduced staff</li> <li>• Concern about wave of retirement in coming years: skill base and loss of experience in general; mentoring will be lost</li> <li>• Work flow is not consistent for logging contractors throughout the year</li> <li>• Not much is known about working conditions for contractors' employees—the agency takes little responsibility for contractor-employee relationships.</li> </ul>
<p>4.1.b. The conditions of employment are as good for non-local workers as they are for local workers doing the same job (e.g., remuneration, benefits, safety equipment, training, and workman's compensation).</p>	C	<ul style="list-style-type: none"> <li>• Mostly on-site visual assessments are conducted. For example, one service contracting technician said that he takes note of subs' use of safety gear in the field when he visits work sites (Burnham)</li> <li>• Contracting Officer Representatives (CORs) are required to evaluate Migrant and Seasonal Agricultural Worker Protection Act (MSPA) issues</li> <li>• Local bidders do use non-local migrant subcontractors</li> </ul>	<ul style="list-style-type: none"> <li>• There has only been cursory, minimal investigation into conditions for non-local workers.</li> <li>• The agency is aware in mostly a cursory manner the relationships between subcontractors and their employees</li> <li>• There appears to be little difference between conditions for local workers and non-local workers, not by enforcement but by lack of close review</li> <li>• REC 2006.4</li> </ul>
<p>4.1.c. Employee compensation and hiring practices meet or exceed standards for comparable forest workers within the region.</p>	C	<ul style="list-style-type: none"> <li>• There is a standardized pay scale for all Forest Service employees that is comparable with/exceeds the regional average</li> <li>• There is an excellent benefits package for FS employees</li> <li>• For Pre-Commercial Thinning (PCT): \$13 an hour, \$16 if subs take their pay in cash</li> <li>• All workers are compensated at a level that meets, if not exceeds the average for the region</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>4.1.d. Forest owners or managers use qualified local foresters, loggers, and contractors. Forest managers and their contractors give preference to qualified local workers.</p>	C	<ul style="list-style-type: none"> <li>• Best-value contracting policy has provisions for local contractors</li> <li>• Most purchasers are from the region, and several hire only local workers. Some crews or crew leaders have documented safety training</li> </ul>	<ul style="list-style-type: none"> <li>• What are the competency/training requirements?</li> <li>• See REC 2006.4</li> </ul>
<p>4.1.e. Forest owners or managers demonstrate a preference for the local procurement of goods and services.</p>	C	<ul style="list-style-type: none"> <li>• The Forest Service is constrained from having a formal policy – they cannot have an explicit local preference</li> <li>• There is an informal preference for local procurement</li> <li>• For small items, like office supplies, FS supports the local Kinko's and Home Depot</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>4.1.f. Forest owners or managers and their contractors comply with the letter and intent of applicable state and federal labor laws and</p>	C	<ul style="list-style-type: none"> <li>• Non-supervisory FS employees have the right to organize</li> </ul>	<ul style="list-style-type: none"> <li>• The FS should continue to monitor contractor's compliance w/ labor laws, including matters of</li> </ul>

regulations ( <i>see also 1.1.a</i> ).		<ul style="list-style-type: none"> <li>• Safety is emphasized as well as adherence to OSHA requirements</li> <li>• Daily safety briefings are held prior to field visits</li> </ul>	<p>compensation and health/safety benefits</p> <ul style="list-style-type: none"> <li>• REC 2006.5</li> </ul>
<p>4.1.g. Forest owners and managers contribute to public education about forest ecosystems and their management.</p> <p><i>For example, forest managers use forests as a training and educational resource.</i></p>	C	<p>There are many opportunities on the MTHNF for public education and collaboration:</p> <ul style="list-style-type: none"> <li>• Stewardship projects</li> <li>• Engagement of local public in watershed groups</li> <li>• Forest is used for as a model for education</li> <li>• School groups and Boy Scout troops have field trips</li> <li>• There is a Junior Rangers program</li> <li>• Various recreation and interpretive programs are offered</li> <li>• The agency is actively advancing collaborative programs and processes, such as Sportsman Park, directly involving local communities</li> <li>• They are working with communities to create wildfire protection plans</li> </ul>	<ul style="list-style-type: none"> <li>• With reduction in budgets and reduced staff, the Forest Service is not able to educate as much as they did previously and as much as some would like</li> </ul>
<b>C4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</b>	C	<b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b>	
<p>4.2.a. The forest owner or manager and their contractors develop and implement safety programs and procedures.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> <li>▪ <i>well-maintained machinery and equipment</i></li> <li>▪ <i>use of safety equipment appropriate to each task</i></li> <li>▪ <i>documentation and posting of safety procedures in the workplace</i></li> <li>▪ <i>educational efforts (such as Forest Industry Safety Training Alliance and Game of Logging)</i></li> <li>▪ <i>contracts with safety requirements</i></li> <li>▪ <i>safety records, training reports, and certificates</i></li> </ul>	C	<ul style="list-style-type: none"> <li>• There is a safety program described in the MTHNF Forest Plan (Chapter 4, pages 78-79)</li> <li>• There are safety training programs &amp; certificates for FS employees</li> <li>• Employees are safety conscious and feel that they are safe working with the agency</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p><b>4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labour Organization (ILO).</b></p> <p><i>Applicability Note for 4.3: Compliance with this criterion can be accomplished with guidance from: FSC Certification and the ILO Conventions, FSC Policy Paper and Guidelines, 20 May 2002.</i></p>	C	<b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>4.3.a. Forest owners or managers and their contractors develop effective mechanisms to resolve disputes between workers and management.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Language translators and cultural interpreters are employed as needed.</i></li> </ul>	C	<ul style="list-style-type: none"> <li>• There is a union for non-supervisory employees</li> <li>• There have been no instances of unresolved disputes</li> <li>• Federal laws allow for contractors to organize</li> <li>• There is a salient example of conflict resolution between the Forest Service &amp; the Timberline concessionaire: potential areas of conflict were identified, both parties agreed to hire a facilitator, and</li> </ul>	<ul style="list-style-type: none"> <li>• There is not enough information available to FS as to contractors' relationships with their subcontractors (especially migrant workers)</li> <li>• REC 2006.6.</li> </ul>

<ul style="list-style-type: none"> <li>▪ <i>Cross-cultural training is employed as needed to integrate the workforce.</i></li> </ul>		<p>an agreement was reached on methods of working smoothly together</p>	
<p><b>4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups directly affected by management operations.</b>  <i>Applicability Note: People and groups directly affected by management operations may include: employees and contractors of the landowner; neighbors; fishers and hunters, as well as other recreational users; local water users; processors of forest products; and representatives of local and regional organizations concerned with social impacts.</i></p>	C	<p><b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b></p>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>4.4.a. Forest owners or managers of large-scale operations provide opportunities for people, as individuals and/or groups, to offer input into management planning when they are affected by forestry operations.</p>	C	<ul style="list-style-type: none"> <li>• There are extensive opportunities for public input on a project basis through the NEPA process</li> <li>• There is contact with the public to solicit input into management planning</li> <li>• The Mt. Hood National Forest has developed a number of partnership and collaborative ventures that offer opportunities for individuals and stakeholder groups to provide input and even participate in management above and beyond NEPA requirements</li> <li>• The stewardship project with the CTWS demonstrates conformance with this Indicator, work with communities on wildfire protection plans, work with recreational groups on ski trail and hut management offer additional opportunities</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>4.4.b. People and groups affected by management operations are apprised of proposed forestry activities (e.g., logging, burning, spraying, and traffic) and associated environmental and aesthetic effects in order to solicit their comments or concerns. Such concerns are documented and addressed in management plans and operations.</p>	C	<ul style="list-style-type: none"> <li>• Stakeholders are apprised of upcoming forest management activities by way of newsletters, mailing lists, and the MTHNF website</li> <li>• Concerns/input are documented and responded to as part of the NEPA process</li> <li>• Because of its commitment to partnerships, the agency goes beyond NEPA requirements for apprising affected groups</li> <li>• For categorical exclusion projects, there is scoping and notice, and decision memos are issued. For controversial projects, the public involvement may be greater for CEs.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>4.4.c. Significant archeological sites and sites of cultural, historical, or community significance, as identified through consultation with state archeological offices, tribes, universities, and local expertise, are designated as special management zones or otherwise protected during harvest operations.</p>	C	<ul style="list-style-type: none"> <li>• There is collaboration with CTWS on identifying significant archeological sites</li> <li>• There are programmatic agreements with State Historic Preservation Offices in Washington and Oregon that have detailed specifics of the Heritage Program</li> <li>• There was an inventory plan written in 1992 which covers specifics of survey protocols for such sites</li> <li>• There are provisions in the MTHNF Forest Plan for these sites, which are protected during harvesting</li> <li>• Sites are also protected through NEPA and other federal</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

		statutes	
<b>C4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</b>	C	<b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b>	•
4.5.a. The forest owner or manager attempts to resolve grievances and mitigate damage resulting from forest management activities through open communication and negotiation prior to legal action.	C	<ul style="list-style-type: none"> <li>• There is an appeals process is in place</li> <li>• The Forest Service uses collaboration and partnerships as a preemptory mechanism to avoid disputes before they arise</li> </ul>	
4.5.b. Forest owners or managers and their contractors have adequate liability insurance.	C	<ul style="list-style-type: none"> <li>• The Forest Service is self-insured</li> <li>• There are standard contract provisions that contractors must be licensed &amp; bonded; must provide proof of insurance</li> </ul>	•
<b>P5 Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.</b>			
<b>C5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.</b>	NC	<b>Budget issues have implications all throughout the standard.</b>	<p>Minor CAR 2006.6</p> <ul style="list-style-type: none"> <li>• The audit team concludes that budgetary reductions have cumulatively risen to a level of non-conformance with the breadth of this Criterion leading to the specification of a Major CAR</li> <li>• The FS is at a “tipping point” at which the budget appears inadequate to maintain ecological productivity in several important areas. Growth vastly exceeds harvest and management activities lag, particularly with respect to management of fire hazard, roads and OHV abuses. The trend lines are in the wrong direction, especially in light of continued budget and staff reductions. Work is either inadequate or developed in ways that do not generate resources sufficient to make the needed investments in the system. The agency has to confront these issues, but is handcuffed institutionally.</li> <li>• Award of certification is contingent upon the FS taking steps to reverse the budgetary trends</li> </ul>
<p>5.1.a. The forest owner or manager is financially able to support long-term (i.e., decades rather than quarter-years or years) forest management (and if necessary restoration), such as planning, inventory, resource protection, and post-harvest management activities.</p> <p><i>For example, investment and reinvestment in forest management are sufficient to fulfill management objectives and maintain and/or restore forest health and productivity.</i></p>	NC	•	<ul style="list-style-type: none"> <li>• Shrinking budgets affect almost all aspects of management on the MTHNF</li> <li>• If you consider that the forest manager is MTHNF (not NFS), there is a weakness here; there is not enough funding for ensuring long-term support of essential management activities</li> <li>• Evidence of under-funding apparent especially with roads: road maintenance is poor because the road crew was eliminated due to lack of funds; road upkeep will continue to decline in the future.</li> </ul>

			<ul style="list-style-type: none"> <li>• Under-funding is also apparent with vegetation management and fuels abatement</li> <li>• Wildlife program has declined as well</li> <li>• Bough harvest – this is perhaps one area which could provide more income for the Forest – as of right now, the resource has been underutilized</li> <li>• NGO stakeholders’ perspective is that there is not enough funding for NEPA, project design, implementation, etc.</li> <li>• Many acres waiting for restoration treatments</li> <li>• Weeds management is under funded</li> </ul>
5.1.b. Responses (e.g., increases in harvests or debt load) to short-term financial factors, such as fluctuations in the market, requirements for immediate cash flow, need for sawmill equipment and log supplies, are limited to levels that enable fulfillment of the management plan.	C	<ul style="list-style-type: none"> <li>• The Forest Service is not engaged in activities driven by an immediate need for revenue generation that compromise long-term forest resource considerations.</li> </ul>	<ul style="list-style-type: none"> <li>• Stakeholder concern was noted that some restoration work is including larger, merchantable trees to help offset restoration costs</li> </ul>
<p><b>C5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest’s diversity of products.</b></p> <p><i>Applicability note to C5.2: Optimal use is a balance of activities that allows the continual use of resources, while maintaining the ecological, social, and economic potentials of the system from which these resources are drawn.</i></p>	C	<p><b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b></p>	<ul style="list-style-type: none"> <li>•</li> </ul>
5.2.a. Preference is given to local, financially competitive, value-added processing and manufacturing facilities.	C	<ul style="list-style-type: none"> <li>• There is an de facto preference for local processing of logs, as these mostly low-value logs can’t be economically hauled far</li> <li>• There is a long-term stewardship contract with the adjacent Confederated Tribes of Warm Springs Reservation</li> <li>• The roads program divides maintenance contracts into sub-area and attempts to contract with local companies to minimize travel time and to provide faster response to emergency situations, such as flood damage</li> <li>• Adequacy and continuity of supply of boughs, bear grass, salal, and mushrooms has facilitated the development of viable, local businesses based upon these products</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
5.2.b. New markets are explored and developed for common, but less-used, species (e.g., alder, tanoak, and madrone), grades of lumber, and/or an expanded diversity of forest products (e.g., small diameter logs, flooring).	C	<ul style="list-style-type: none"> <li>• There is a relationship between the forest products lab and MTHNF management</li> <li>• CTWS is developing a biomass facility, creating a new market</li> <li>• Special Forest Products (NTFPs) provide further diversification opportunities</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
5.2.c. The technical and financial specifications of some sales of forest products are scaled to promote successful competition by small businesses.	C	<ul style="list-style-type: none"> <li>• There are SBA timber sales, but all qualified bidders meet requirements</li> <li>• Special forest products permits are small enough to facilitate the entrance of new, small businesses</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
5.2.d. When non-timber products are harvested or utilized, the	C	<ul style="list-style-type: none"> <li>• Special forest products are addressed in the MTHNF</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

management and use of those products are incorporated into the management strategy.		Forest Plan <ul style="list-style-type: none"> <li>The special forest products program has received strong public support and is being carefully expanded within biological limits</li> </ul>	
<b>C5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</b>	C	<b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b>	•
5.3.a. Felling, skidding/yarding, bucking, sorting, and handling are carried out in a way that maximizes volume and value.	C	<ul style="list-style-type: none"> <li>These issues are covered in “B” and “C” contract provisions, which deal with on-the-ground rules &amp; specifications for harvesting contractors</li> <li>There is a strong, built-in incentive to maximize volume and value given how the product is bought - the biggest factor in how much money is made depends on how trees are bucked, sorted, and sold, so contractors have a strong incentive to maximize efficiency</li> </ul>	•
5.3.b. Harvest is implemented in a way that conserves the integrity of the residual stand. Provisions concerning acceptable levels of residual damage are included in operational contracts.  <i>For example, bumper trees are used and equipment is selected and used in a way that minimizes unintentional damage to crop trees.</i>	C	<ul style="list-style-type: none"> <li>Acceptable limits are covered in B and C provisions as well.</li> <li>Overall, harvesting on the MTHNF does conserve the integrity of the residual stand.</li> </ul>	• Some excessive bole damage was observed in the “M” Thinning from shovel yarding. This sample was too small to be of general concern and the resulting small pockets of rot may be beneficial to cavity excavators
5.3.c. Tree limbs, tops, snags, down logs, and other biomass are retained on site in adequate quantities and quality for ecosystem function, wildlife habitat, and future forest productivity. After adequate woody debris has been left on site to provide nutrient cycling and habitat, additional byproducts of harvest and in-the-field milling operations are considered for use in other productive processes.  <i>For example:</i> <ul style="list-style-type: none"> <li>Chips and sawdust are used for mulch, filler, or fuel.</li> <li>Small diameter boles are used for fence posts, flooring, and furniture stock.</li> </ul>	C	<ul style="list-style-type: none"> <li>Current plans require leaving at least 2 snags, 6 downed logs, and 15% of the green trees per acre.</li> <li>Field visits indicated that these requirements are being met and mostly exceeded by up to five fold</li> <li>This is not currently a problem on the MTHNF, but must be paid close attention to in the future with the opening of the CTWS biomass facility</li> </ul>	•
<b>C5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</b>	C	<b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b>	
5.4.a. Forest uses and products are diversified through management, while maintaining forest composition, structures, and functions.  <i>For example, compatible uses may include recreation, ecotourism, hunting, fishing, and specialty products.</i>	C	<ul style="list-style-type: none"> <li>The Multiple Use-Sustained Yield Act requires management for a diversity of forest uses</li> <li>As an urban national forest, MTHNF in particular caters to a variety of users for recreation, fishing, special forest products gathering, etc.</li> </ul>	
5.4.b. The forest owner or manager reinvests in the local economy and the community through both active civic engagement and ongoing capital investment.  <i>For example:</i>	C	<ul style="list-style-type: none"> <li>The watershed projects add capital to the local community</li> <li>There are many examples of active civic engagement/collaboration</li> </ul>	• With limited budgets, there is less money available to reinvest in the surrounding communities

<ul style="list-style-type: none"> <li>▪ Facilities and equipment are regularly maintained and updated.</li> <li>▪ Absentee owners maintain a local office.</li> <li>▪ The owner or manager supports local business development by working with organizations, such as the chamber of commerce.</li> </ul>			
<p><b>C5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</b></p> <p><i>Note: The Working Group considers this criterion sufficiently explicit and measurable. Indicators are not required.</i></p>	C	<b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b>	
<p><b>C5.6. The rate of harvest of forest products shall not exceed levels that can be permanently sustained.</b></p>	C		
<p>5.6.a. The level of sustainable harvest is based on clearly documented projections that use growth and regeneration data, site index models, and the classification of soils. The level of documentation is determined by the scale and intensity of the operation. (see also 7.1.d)</p>	C	For the MTHNF, the PSQ is 64 MMBF. The actual rate of harvest is only 25 MMBF.	
<p>5.6.b. Growth rates equal or exceed average harvest rates over rolling periods of no more than 10 years. In cases where owners or managers harvest timber at intervals longer than ten years, the allowable harvest is determined by the target stocking levels and the volume of re-growth since the previous harvest.</p>	C	For the MTHNF, the PSQ is 64 MMBF. The actual rate of harvest is only 25 MMBF.	
<p>5.6.c. The rate and methods of harvest lead to well-stocked stands across the forest management unit (FMU). Under-stocked and over-stocked stands are returned to fully stocked levels at the earliest practicable time.</p>	NC		<ul style="list-style-type: none"> <li>• Especially on the eastside, there are very overstocked stands. MTHNF is actually not harvesting enough to meet this indicator.</li> <li>• Minor CAR 2006.7</li> </ul>
<p><b>P6 Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.</b></p>			
<p><b>C6.1. Assessments of environmental impacts shall be completed - appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.</b></p> <p><i>Applicability Note: Small landowners that practice low-intensity forestry may meet this requirement with brief, less rigorous assessments. More extensive and detailed assessments (e.g., formal assessments by experts) are expected from large landowners and/or those who practice more intensive forestry (see Glossary) management.</i></p>	C	<b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b>	
<p>6.1.a. Using available science and local expertise, forest owners and managers identify and describe:</p> <ol style="list-style-type: none"> <li>(1) ecological processes, such as disturbance regimes;</li> <li>(2) common plants, animals, and their habitats;</li> <li>(3) rare plant community types (see Glossary and Appendix D);</li> <li>(4) rare species and their habitats (see Glossary);</li> </ol>	C	<ul style="list-style-type: none"> <li>• Through various planning mechanisms, all of these processes/resources are identified on a site-specific level by trained professionals.</li> <li>• Roughly 20 different watershed analyses have been done for the whole forest; each of which cover all of these topics, and require the participation of botanists,</li> </ul>	

(5) water resources; and (6) soil resources (see also 7.1.a and b).		wildlife biologists, fisheries biologists, soil scientists, hydrologists, etc. <ul style="list-style-type: none"> <li>• Fire regime condition classes have been mapped for the entire region</li> <li>• Separate analyses have been done for all Late Successional Reserves, which feed into analyses for NEPA. NEPA also requires specialists/experts in these areas on a project level basis.</li> </ul>	
6.1.b. Using available science and local expertise, current ecological conditions are compared to the historical conditions within the landscape context, considering the elements identified in 6.1.a.	C	<ul style="list-style-type: none"> <li>• Watershed analyses and fire regime condition classes both compare current conditions to historically referenced (baseline) conditions.</li> </ul>	<ul style="list-style-type: none"> <li>• The fire condition classes project was a modeling exercise, rather than a sample done of, for example, tree ring studies.</li> <li>• REC 2006.7</li> </ul>
6.1.c. Prior to the commencement of management activities, potential environmental impacts and their cumulative effects are evaluated.	C	<ul style="list-style-type: none"> <li>• The NEPA process is based upon a formal evaluation of potential environmental impacts (EA/EIS), and seeks alternatives to potentially harmful management actions</li> <li>• Resource specialists (e.g. fisheries biologists/botanists) walk stands as part of planning and identify potential rare species present...this information comes back to silviculturists</li> <li>• Categorical exclusions, EAs, and EISs include analyses of cumulative direct effects.</li> </ul>	<ul style="list-style-type: none"> <li>• There is not as much transparency in evaluating environmental impacts with Categorical Exclusions (which, by definition, are activities that do not have cumulative impacts)</li> <li>• Categorical Exclusion documentation is not as robust as for EAs</li> </ul>
6.1.d. Using assessments derived from the above information, options are developed and implemented to maintain and/or restore the long-term ecological functions of the forest (see also 7.1.c). Actions needed to avoid and mitigate negative environmental impacts are identified, and a mitigation plan is formulated (see also criterion 7.1).	C	<ul style="list-style-type: none"> <li>• Under NEPA, several alternatives are developed</li> <li>• For CEs, there is an informal internal scoping that first considers available options in an interdisciplinary way, then one is selected.</li> </ul>	<ul style="list-style-type: none"> <li>• For Categorical Exclusions, this is not as robust as for EAs</li> <li>• Stakeholder concern that FS is more reliant on CEs</li> </ul>
6.1.e. Assessments developed under 6.1.a. – d. for public lands are made available to the public.	C	<ul style="list-style-type: none"> <li>• All NEPA documents are publicly available</li> <li>• The project files, decision memos, and specialist reports for CEs (as employed on MTHNF) are available to the public by contacting the team leader or through FOIA upon request</li> </ul>	<ul style="list-style-type: none"> <li>• REC 2006.8</li> </ul>
<b>C 6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.</b>	C	<b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b>	
6.2.a. If consultation of databases for rare species and/or plant community types (see Glossary and 6.1) indicate the likely presence of a rare species (see Glossary), then either a survey is conducted prior to the commencement of management activities (to verify the species' presence or absence) or the forest owner or manager manages as though the species were present. If a rare species is determined to be present, its location is reported to the manager of the species' database.	C	<ul style="list-style-type: none"> <li>• Survey and Manage program requires special surveys and protection buffers for special status plants and animals.</li> <li>• Prior to every operation a botanist walks each area and identifies any rare vascular &amp; non-vascular plants present, then feeds that information back to the silviculturist to alter plans accordingly</li> <li>• If there is a stream in the operation area, it is walked</li> </ul>	<ul style="list-style-type: none"> <li>• Habitat assessments for wildlife are not as thorough as for rare plants and sensitive fish</li> <li>• A number of sensitive raptor species are listed in the 1990 Forest Plan - these areas are supposed to be buffered, but no one has been out to do raptor surveys for many years (reported to Vesely by 2 FS staff)</li> <li>• In many cases the FS DOES presume a project</li> </ul>

		<p>by a fisheries biologist to survey for threatened/sensitive species.</p> <ul style="list-style-type: none"> <li>Plant and animal location records maintained in FAUNA and TERRA databases</li> </ul>	<p>area is occupied by T&amp;E species. However, wildlife conservation measures established in the 1990 plan are no longer implemented.</p> <ul style="list-style-type: none"> <li>This is a small weakness, but not a nonconformance</li> </ul>
6.2.b. When a rare species and/or plant community type is present or assumed to be present, modifications are made in both the management plan and its implementation in order to maintain, improve, or restore the species and its habitat.	C	<ul style="list-style-type: none"> <li>On each project, there is feedback to the silviculturist from the botanist and fisheries bio.</li> <li>If there is a categorization of LAA – “Likely to Adversely Affect” – projects may be pulled and modified to avoid harmful effects to species present</li> </ul> <p><i>Examples:</i></p> <ul style="list-style-type: none"> <li>At the 2007 Thin on the Clackamas RD, there is an intermittent watercourse. Rather than building a bridge to haul over it, the FS is opting to do cable/helicopter logging to avoid affecting anadromous species.</li> <li>At the Cub Commercial Thin, a temporary haul road was constructed because the existing road from the last entry became nesting/roosting/foraging habitat for owls.</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>
6.2.c. Conservation zones ( <i>see Glossary</i> ) and other protected areas for existing rare species and/or plant community types are created and/or maintained to enhance the viability of populations and their habitats, including their connectivity within the landscape. Forest managers consult recovery plans and specialists, such as biologists or ecologists, to determine species' habitat needs.	C	<ul style="list-style-type: none"> <li>The Late Successional Reserve system in NW Forest Plan was designed exactly to do this</li> <li>Riparian reserves constitute a large portion of protected area on the MTHNF</li> <li>There are conservation zones for late successional species.</li> <li>Roughly 70% of the Forest is excluded from timber harvesting and is either de-facto or officially designated conservation zones</li> <li>Even in matrix lands, regeneration treatments require 15% retention (10% in clumps, 5% scattered)</li> <li>Protection buffers are established around selected species locations under the Survey and Manage program.</li> <li>Other species such as Great Grey Owls are addressed in the NWFP under Protection Buffer species.</li> <li>The Hood River RD incorporated a specific ‘lichen corridor’ in one of their planning efforts.</li> <li>Most Watershed Analyses indicate that connectivity corridors, and especially the riparian reserve network are for many species. The Green Tree Retention and Riparian Reserves in the NWFP specifically mention less mobile species.</li> </ul>	<ul style="list-style-type: none"> <li>Connectivity is only for owls, and does not address other species such as lichens, etc.</li> <li>Connectivity for some of the poor &amp; upslope dispersers is not fully addressed</li> <li>There is an imbalance of focus – mainly on vertebrates that can disperse widely</li> <li>1990 Forest Plan established management direction for gray squirrels, turkeys, and other species that are seemly disregarded now. Species not associated with late successional forests receive little attention.</li> </ul>
6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity.	C	<p><b>Over the breadth of Sub-Criteria and Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b></p>	

<p>c) Natural cycles that affect the productivity of the forest ecosystem.  d) Old-growth stands and forests  e) Retention  f) Even-aged silvicultural systems</p> <p><i>Applicability note: Indicators under 6.3.a. &amp; b. may have limited applicability for managers of small and mid-sized forest properties because of their limited ability to coordinate their activities with other owners within the landscape, or to significantly maintain and/or improve landscape-scale vegetative patterns.</i></p>			
<p><b>C6.3.a. Forest regeneration and succession</b></p>	<p>C</p>		
<p>6.3.a.1. Forest owners or managers use the following information to make management decisions regarding regeneration: landscape patterns (e.g., successional processes, land use/land cover, non-forest uses, habitat types); ecological characteristics of adjacent forested stands (e.g., age, productivity, health); species' requirements; and frequency, distribution, and intensity of natural disturbances.</p>	<p>C</p>	<ul style="list-style-type: none"> <li>• Watershed Analyses address species and ecological characteristics/habitat types at the local level</li> <li>• MTHNF and the Forest Service employ certified silviculturists</li> <li>• Stand exams are used to gather local timber inventory and ecological information within fairly tight budget limits</li> <li>• Sites are reviewed and regeneration plans are developed by multi-disciplinary teams</li> <li>• The FS is not engaged in regeneration forestry: total tree planting for the MTHNF in 2005 was only 380 acres.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>6.3.a.2. Forest owners or managers maintain or restore portions of the forest to the range and distribution of age classes of trees that would result from natural processes inherent to the site.</p>	<p>C</p>	<ul style="list-style-type: none"> <li>• An analysis was done that determined there was a lack of late successional forests (compared to historic range of variability [HRV]) – the result was the Northwest Forest Plan</li> </ul>	<ul style="list-style-type: none"> <li>• There is some concern that in the future, early successional Forests may not be well-represented given the emphasis on LSRs. Perhaps only 5-10% of the forest is currently in the stand initiation phase, which doubtfully is in line with HRV.</li> <li>• Forage for deer &amp; elk is disappearing, along with habitat for shrub associated birds &amp; neotropical migrants</li> <li>• The FS is not harvesting in a manner that creates this age class; additionally there is a very effective fire program that prevents creation of early seral habitat &amp; puts stands at risk for insect outbreaks.</li> <li>• MTHNF should look for ways to recruit more early successional stands. Size would range from gaps of a couple acres to 500 acres with lots of retention: islands, scattered, lots of green trees retained throughout (fine-scale heterogeneity w/ stream buffers, great big trees retained, patches of closed canopy forest). However, this should not be created by sacrificing late successional – important to not go overboard.</li> <li>• REC 2006.9</li> <li>• REC 2006.10</li> </ul>
<p>6.3.a.3. Silvicultural practices generate stand conditions (species</p>	<p>C</p>	<ul style="list-style-type: none"> <li>• The FS is trying to generate stand conditions typical</li> </ul>	<ul style="list-style-type: none"> <li>• Prescriptions attempt to emulate natural processes,</li> </ul>

composition, physical structures, habitat types, and ecological processes) that are similar to those produced by disturbance regimes typical for the site		<p>for the site and keep certain structural elements – for example, preserving minor tree species, but not <i>enough</i> of it is occurring (due to budget constraints, among others)</p> <ul style="list-style-type: none"> <li>• In regeneration cuts, the retention is not <i>exactly</i> like the natural situation, but it still retains a diversity of structures</li> </ul>	but given the current fire suppression policies not enough work can be done.
<b>C6.3.b. Genetic, species, and ecosystem diversity</b>	C		
6.3.b.1. The forest owner or manager selects trees for harvest, retention, and planting in a manner that maintains or enhances the productive capacity, genetic diversity and quality, and species diversity of the residual stand.	C	<ul style="list-style-type: none"> <li>• The selection of trees for harvest is largely driven by ecological motives</li> <li>• The use of “Designation by Description” for tree-marking provides emphasizes the retention of minor species when warranted.</li> </ul>	<ul style="list-style-type: none"> <li>• There was one instance, in the West 5 Mile, where some large trees were taken out for volume.</li> </ul>
6.3.b.2. Native seeds of known provenance are used for artificial regeneration.	C	<ul style="list-style-type: none"> <li>• The MTHNF has a Tree Improvement Program, which uses seed “bands”, called breeding zones, for elevational zones</li> <li>• MTHNF is currently producing second generation improved seed</li> <li>• The 1996 MTHNF Genetic Resources Plan has 3 program goals: <ol style="list-style-type: none"> <li>1. To conserve the natural genetic variation and diversity contained in the forest stands of the MTHNF</li> <li>2. To produce genetically selected plant materials for use in reforestation and ecosystem restoration programs</li> <li>3. To incorporate genetics into programs using native species.</li> </ol> </li> <li>• Example of plan in action: At the Cub Commercial Thin, the stand had been planted 40 years ago with off-site pine (New Mexico). The plan now is to replant the area with seeds from local provenances.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
6.3.b.3. Habitat components necessary to support native species are protected, maintained, and/or enhanced within the harvest unit and across the FMU ( <i>see also 6.3.e.1</i> ).  <i>For example:</i> <ul style="list-style-type: none"> <li>▪ <i>vertical and horizontal structural complexity</i></li> <li>▪ <i>understory species diversity</i></li> <li>▪ <i>food sources</i></li> <li>▪ <i>nesting, denning, hibernating, and roosting structures</i></li> <li>▪ <i>habitats and refugia for sedentary species and those with special habitat requirements</i></li> </ul>	C	<ul style="list-style-type: none"> <li>• With retention harvests, over time vertical heterogeneity will be provided in the stands</li> <li>• For horizontal complexity , there is both group retention as wells as scattered...for example in the Tarzan harvest, there was a diverse island reserve plus random other trees retained</li> <li>• In Matrix lands there is variable density thinning</li> <li>• In LSRs there is “Very” variable density thinning – which includes skips and gaps.</li> <li>• Selection cuts and snag retention policies conserve individual habitat elements for native species</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
6.3.b.4. At the FMU level, a comprehensive range of native species, habitats, stand types, age and size classes (including large and old trees), and physical structures is maintained over time.	C	<ul style="list-style-type: none"> <li>• The Forest Service manages the MTHNF for a wide range of native species, habitats, stand types, etc.</li> </ul>	<ul style="list-style-type: none"> <li>• There is concern over the adequacy of current levels of early successional species habitats.</li> <li>• See REC 2006.10 related to Regional Indicator</li> </ul>

			6.3.a.2.
<b>C6.3.c. Natural cycles that affect the productivity of the forest ecosystem</b>	C		
<p>6.3.c.1. If a decline in soil fertility or forest health is observed, forest owners or managers determine the source of the decline through tests and investigation. If soil degradation is found to be the source of the decline, forest owners or managers modify soil-management techniques.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Primary management objectives shift from commercial production to restoration.</i></li> <li>▪ <i>Site preparation is minimized.</i></li> <li>▪ <i>The lightest practical equipment with the lowest ground pressure is used.</i></li> <li>▪ <i>Whole-tree harvesting is discontinued, and tops are left in the forest.</i></li> <li>▪ <i>Longer rotations and a diversity of species are used in lieu of artificial fertilization.</i></li> <li>▪ <i>Natural, early successional processes are allowed or encouraged.</i></li> </ul>	C	<ul style="list-style-type: none"> <li>• MTHNF is not practicing the brand of forestry where depleting forest soils is likely (i.e. whole tree logging, leaving no biomass, 30-year rotations, dependency on fertilizers)</li> <li>• Soil compaction is limited to a maximum of 15% of a project area and compacted areas from past projects are regularly restored with entries for current projects</li> <li>• Soil compaction is monitored regularly and proactively by two soil scientists on staff on the westside, and one for the eastside.</li> <li>• Forest health problems are not attributable to mismanagement of soil - declines in health on the MTHNF are only related to insects and disease</li> <li>• Insect and disease outbreaks are treated with silviculture and integrated pest control measures</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>6.3.c.2. Forest managers identify and apply site-specific fuels management practices, based on:</p> <p>(1) natural fire regimes,  (2) risk of wildfire,  (3) potential economic losses, and  (4) public safety.</p>	C	<ul style="list-style-type: none"> <li>• Public safety is a major factor in deciding which areas get treatment; particularly for urban-wildland interfaces</li> <li>• Fuels treatments are very site specific – for one 40 acre block, there were 16 different fuels reduction prescriptions</li> <li>• Post-harvest slash is treated by piling, burning, etc.</li> <li>• The FY2005 Monitoring Report shows a rate of 1500 acres treated per year with prescribed fire.</li> </ul>	<ul style="list-style-type: none"> <li>• See C5.1 (budget constraints)</li> <li>• Fuels management is not keeping up with increasing fuel loads and fire hazards</li> </ul>
<p>6.3.c.3. Post-harvest management activities maintain soil fertility, structures, and functions.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Slash is randomly distributed across the harvest area.</i></li> <li>▪ <i>Burning is used where it is appropriate to the natural disturbance regime.</i></li> </ul>	C	<ul style="list-style-type: none"> <li>• There was evidence of sufficient slash distribution in cut blocks (i.e. no obvious concentration) - not all the piles are burned, up to half of are kept because they provide microhabitat</li> <li>• Distributed slash decays quickly on certain sites, especially on the westside which receives more precipitation</li> <li>• There is enough recycling of woody material on harvested sites – MTHNF does not practice whole-tree yarding and no broadcast burns are done</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>6.3.c.4. Prescriptions for salvage harvests balance ecological and economic considerations.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Coarse woody debris is maintained.</i></li> <li>▪ <i>Den trees and snags are maintained.</i></li> </ul>	C	<ul style="list-style-type: none"> <li>• In prescriptions for salvage harvest on the MTHNF, snags are maintained &amp; pests are allowed to exist, there is a clear consideration of ecological values</li> <li>• With salvage harvests, the emphasis is on economics</li> <li>• Salvage harvest on the Mt. Hood currently is very small. In fiscal year 2006, there were 61 acres of</li> </ul>	<ul style="list-style-type: none"> <li>• Some individual prescriptions typically do balance ecological and economic considerations, but forest-wide salvage harvests are underutilized, inadequately weighting economic considerations, which otherwise could result in more salvage harvests and forest improvement.</li> </ul>

<ul style="list-style-type: none"> <li>Natural, background levels of 'pest' populations are allowed exist before measures to control such populations are implemented.</li> </ul>		<p>salvage harvest and there are approximately 1,000 acres of beetle caused mortality. Current planning efforts are only proposing a very small percentage of salvage harvest of this mortality.</p> <ul style="list-style-type: none"> <li>The audit team does not believe that there is inappropriate sacrifice of ecological considerations in the design and executions of salvage sales</li> </ul>	
<p><b>C6.3.d. Old-growth stands and forests</b></p> <p><b>Note: Failure to meet the provisions of Criterion 6.3.d. will be considered a major failure (fatal flaw).</b></p>	<p>NC</p>		<p>Major CAR 2006.2</p>
<p><i>This section uses the following definitions:</i></p> <ul style="list-style-type: none"> <li>Type 1 stands are those stands of at least 20 contiguous acres that have never been logged and that display late successional/old-growth characteristics. Stands that have never been logged, but which are smaller than 20 acres, are assessed for their ecological significance, and may also be classified as Type 1 stands. Areas containing a low density of existing roads may still be considered Type 1 stands, provided the roads have not caused significant, negative ecological impacts.</li> <li>Type 2 stands are old unlogged stands smaller than 20 acres that are not classified as Type 1, and other stands of at least 3 contiguous acres that have been logged, but which retain significant late-successional/old-growth structure and functions.</li> <li>Type 3 stands are those that have residual old-growth trees and/or other late-successional/old-growth characteristics, but do not meet the definition of a Type 2 stand.</li> </ul> <p><i>Applicability note: When forest management activities (including timber harvest) create and maintain conditions that emulate Type 2 or 3 stands, the management system that created those conditions may be used to maintain them. Such areas may be considered as representative samples for the purposes of meeting criterion 6.4.</i></p>			
<p>6.3.d.1. Non-tribal Type 1 stands are not harvested. Timber harvests may be certifiable on Type 1 American Indian lands, in recognition of their sovereignty and unique ownership. Requirements for certification of tribal operations that include harvest in Type 1 stands are:</p> <ul style="list-style-type: none"> <li>Type 1 forests comprise a significant portion of the tribal ownership</li> <li>A history of forest stewardship by the tribe exists</li> <li>High Conservation Value Forest attributes are maintained</li> <li>Old-growth structures are maintained in the managed stand</li> <li>Conservation zones representative of Type 1 stands have been established</li> <li>Landscape level considerations have been addressed</li> <li>Rare species (<i>see Glossary</i>) are protected</li> </ul>	<p>NC</p>	<ul style="list-style-type: none"> <li>The Forest Service was fully forthright in discussing old growth policies and management with the auditor team during the field evaluation..</li> <li>Eastside stands may not meet the FSC definition of type 1 old growth due to fire exclusion that has resulted in anthropomorphic alternation of stand conditions; as such, harvest entries in fire-excluded eastside stands could constitute an ecologically appropriate treatment that is compatible with the FSC position on old growth management. But for harvesting to be found in conformance with FSC requirements post-harvest ecological conditions must be demonstrably improved; this is unlikely to happen if economics/volume removal is the driver of the harvest prescription</li> </ul>	<ul style="list-style-type: none"> <li>Major CAR 2006.2 ( non-conformance with a fatal flaw indicator): There are Type 1 stands on the westside. These are in the matrix areas, and have been logged, and may be logged in the future</li> <li>Example: Tarzan regeneration harvest</li> <li>There is nothing in the Forest Plan or the Pacific Northwest Plan that would prevent Type 1 or Type II Old Growth on the eastside to be converted to Type III</li> <li>Due to fire exclusion, eastside old growth stands, in the view of the team ecologists, do not meet the FSC definition of Type 1; as such, harvesting operations in those stands provided that they meet Type 2 definition after harvest may not constitute a non-conformance.</li> </ul>
<p>6.3.d.2. Management activities adjacent to Type 1 stands are conducted to minimize abrupt forest/opening edge effects and other negative impacts on the ecological integrity of these areas.</p>	<p>NC</p>	<ul style="list-style-type: none"> <li>Many stands in the Forest are protected as LSRs; there is not much harvesting occurring on the Forest as a whole</li> <li>Only 15% of the Forest is in matrix</li> </ul>	<ul style="list-style-type: none"> <li>By definition, regeneration harvesting is cutting in late seral stands. A harvest such as that seen at Tarzan adjacent to an old growth stand would be considered an abrupt opening.</li> <li>On the MTHNF, a lot of the Type 1 stands are within Matrix designations – regeneration cuts do produce large openings.</li> <li>There is no policy preventing these abrupt openings from being created adjacent to Type 1 stands.</li> <li>Major CAR 2006.2</li> </ul>

<p>6.3.d.3. Timber harvests in Type 2 and Type 3 stands maintain late-successional/old-growth structures, functions, and components, including individual trees that function as refugia. There is no net decline in the area or the old-growth characteristics of Type 2 or Type 3 stands due to forest management, with the exception of Type 3 stands that are elevated to Type 2 stands.</p>	<p>NC</p>	<ul style="list-style-type: none"> <li>• Forest Service personnel have affirmatively engaged the audit team in analyzing and assessing current old growth policies vis-à-vis FSC old growth requirements</li> <li>• 90,000 acres of old growth are allocated to late successional reserve</li> <li>• Management of MTHNF complies with the Northwest Forest Plan, but the NWFP standards and guidelines do not comply with the FSC Pacific Coast Regional Standard</li> </ul>	<ul style="list-style-type: none"> <li>• The audit team was unable to reach clear findings as to conformity of eastside old growth harvest but with respect to the westside, it is quite clear to the audit team that there is non-conformance with FSC requirements</li> <li>• West 5 Mile site (matrix designation) met Type 2 old growth definition before the most recent harvest and continues to meet the definition afterwards, but the audit team ecologists conclude that the ecological values in that particular stand have been reduced due to the harvest entry</li> <li>• Spatial scale: in the context of the range of historic variability and the historic extent of old growth in the region now delineated as the MTHNF, there is already plenty of harvest-related variability and, as such, there is little ecological need for creating more late seral</li> <li>• To the extent that harvest in old growth stands is driven by economic rather than ecological in matrix lands, nonconformance with this indicator is much more likely</li> <li>• 55,000 ac of old growth in Matrix, not in Riparian Reserves—these are the stands for which scheduled timber harvests are most likely to be found in nonconformance under current FS standards and guidelines</li> <li>• Much of the old growth acres on the Forest are fragmented</li> </ul>
<p>6.3.d.4. Where Type 1, 2, and 3 stands are under-represented in the landscape, a portion of the forest is managed to create late-successional/old-growth characteristics.</p>	<p>C</p>	<ul style="list-style-type: none"> <li>• Late Successional Reserves, which constitute about 80% of the entire forest, are managed expressly to create and maintain late successional/old-growth characteristics under the Northwest Forest Plan.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p><b>6.3.e. Retention</b>  <i>Applicability note: Several types of retention are required by this standard with respect to green trees, snags, and woody debris. The amounts of each of the following types of retention and/or set-asides are not necessarily cumulative.</i>  <i>Retention and set-aside provisions include:</i></p> <ul style="list-style-type: none"> <li>▪ <i>habitats of sensitive, threatened, and endangered species (criterion 6.2)</i></li> <li>▪ <i>old-growth and late successional trees (6.3.d)</i></li> <li>▪ <i>post-harvest, within-stand tree retention (6.3.e.5)</i></li> <li>▪ <i>green trees around snags (6.3.e.2)</i></li> <li>▪ <i>native hardwoods (6.3.e.3)</i></li> <li>▪ <i>representative stand types (criterion 6.4)</i></li> <li>▪ <i>riparian management zones (criterion 6.5)</i></li> <li>▪ <i>late-seral management areas (10.5.a)</i></li> </ul>			<ul style="list-style-type: none"> <li>•</li> </ul>

<p>6.3.e.1. Forest owners and managers retain (or, if absent, recruit) legacy trees, old and large trees, snags and woody debris to sustain populations of native plants, fungi, and animals, both within the harvest unit and across the FMU.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> <li>▪ Old trees with irreplaceable characteristics are retained.</li> <li>▪ In some dry regions, retaining approximately 10 tons of debris per acre may be sufficient. In wetter regions, retaining 20 tons of debris per acre may be sufficient.</li> <li>▪ Debris is well distributed spatially and by size and decay class, with a goal of at least 4 large pieces (approximately 20" diameter X 15' length) per acre.</li> <li>▪ Three to 10 snags per acre (averaged over 10 acres) are maintained or recruited.</li> <li>▪ Snags are well represented by size, species, and decay class.</li> </ul>	C	<ul style="list-style-type: none"> <li>• The minimum standard for retention of snags is 2 per acre; 10 per acre are commonly left.</li> <li>• The minimum retention standard for downed logs is 6 per acre &gt;20" in diameter and totaling at least 240 lineal feet</li> </ul>	•
<p>6.3.e.2. Where necessary to protect against wind throw and to maintain microclimate, green trees and other vegetation are retained around snags, down woody debris, and other retention components.</p>	C	<ul style="list-style-type: none"> <li>• On the west side, every regeneration harvest contains an island reserve. The 10% clumped retention provides a buffer for any features within.</li> <li>• MTHNF has designed riparian reserves wide enough to maintain microclimates in-channel, as well as adjacent to stream channels.</li> </ul>	•
<p>6.3.e.3. Native hardwoods and understory vegetation are retained as needed to maintain and/or restore the natural mix of species and forest structure.</p>	C	<ul style="list-style-type: none"> <li>• Conformance example at the 2007 Sandstone Thin site – the harvest plan calls for retention of bigleaf maple</li> </ul>	•
<p>6.3.e.4. Live trees and native understory vegetation are retained within the harvest unit in proportions and configurations that are consistent with the characteristic natural disturbance regime in each community type (<i>see Glossary</i>), unless retention at a lower level is necessary for purposes of restoration.</p>	C	<ul style="list-style-type: none"> <li>• For the west side, 15% retention is required – 5% of which is scattered and 10% in clumped reserves. This amount and distribution is felt to be representative for the area's natural regime</li> <li>• On eastside, retention was still within the historic range (example at West 5 Mile) and follows the same requirements</li> </ul>	
<p>6.3.e.5. Within harvest openings larger than 6 acres, 10-30% of pre-harvest basal area is retained. The levels of green-tree retention depend on such factors as: opening size, legacy trees, adjacent riparian zones, slope stability, upslope management, presence of critical refugia, and extent and intensity of harvesting across the FMU. Retention is distributed as clumps and dispersed individuals, appropriate to site conditions. Retained trees comprise a diversity of species and size classes, which includes large and old trees.</p>	C	<ul style="list-style-type: none"> <li>• Under the Northwest Forest Plan, the retention policy is 15% of the biggest trees – which translates to more than 10-30% of pre-harvest basal area.</li> </ul>	
<p><b>6.3.f. Even-aged silvicultural systems</b></p>			
<p>6.3.f.1. Even-aged silviculture (<i>see Glossary</i>) may be employed where: 1) native species require openings for regeneration or vigorous young-stand development, or</p>	C	<ul style="list-style-type: none"> <li>• Even-age silviculture is employed on the MTHNF in regeneration harvests of Doug fir on the west side. Points (1) and (3) apply, as some believe Doug fir is dependent on openings for vigorous new stand</li> </ul>	•

<p>2) it restores the native species composition, or 3) it is needed to restore structural diversity in a landscape lacking openings, while maintaining connectivity of older, intact forests.</p>		<p>establishment, and there is a desire to maintain early seral habitat within the HRV.</p>	
<p>6.3.f.2. When trees are planted, the plantings maintain or enhance the composition and/or diversity of the forest ecosystem.</p>	C	<ul style="list-style-type: none"> <li>• Hardly any planting is done on MTHNF (380 acres last year), but when it occurs, multiple species are used.</li> <li>• Example: the Tarzan cut will be planted with noble fir, Doug fir and blister rust resistant Western white pine.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>6.3.f.3. If regeneration harvest ages do not approach culmination of mean annual increment (CMAI, <i>see Glossary</i>), retention approaches the upper end of the range required in 6.3.e.5.</p>	C	<ul style="list-style-type: none"> <li>• Regeneration harvests may not be performed unless stands have reached or surpassed 95% of CMAI (Cumulative mean annual increment) (See Forest Plan, 4-86)</li> <li>• This indicator is largely not applicable</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>6.3.f.4. Regeneration harvest blocks in even-aged stands average 40 acres or less. No individual block is larger than 60 acres (<i>see 6.3.e.4. and 6.3.e.5. for provisions of within-stand retention in openings larger than 6 acres</i>).</p>	C	<ul style="list-style-type: none"> <li>• The MTHNF Forest Plan dictates that openings may not exceed 40 acres for eastside-Cascade (mixed) forest types, and 60 acres for west side Douglas fir types (see 4-89)</li> <li>• The average harvest size is lower than 40 acres</li> </ul>	
<p>6.3.f.5. Regeneration in previously harvested areas reaches a mean height of at least seven feet or achieves canopy closure (<i>see Glossary</i>) before adjacent areas are regeneration harvested.</p>	C/NC	<ul style="list-style-type: none"> <li>• The MTHNF Forest Plan requires a height of 4.5 feet for their green-up policy. By practice, the FS is not cutting in areas adjacent to stands of 4.5 feet or no canopy closure.</li> </ul>	<ul style="list-style-type: none"> <li>• The MTHNF Forest Plan's requirement for green-up (4.5 feet) does not meet the FSC Pacific Coast Regional Standard—Minor CAR 2006.8</li> </ul>
<p><b>C6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</b> <i>Applicability Note: When forest management activities (including timber harvest) create and maintain conditions that emulate an intact, mature forest or other successional phases that may be under-represented in the landscape, the management system that created those conditions may be used to maintain them, and the area may be considered as a representative sample for the purposes of meeting this criterion.</i></p> <p><i>Ecologically viable representative samples are designated to serve one or more of three purposes: (1) to establish and/or maintain an ecological reference condition, (2) to create or maintain a representative system of protected areas (i.e., includes samples of all successional phases, forest types, and plant communities (see Glossary and Appendix D), and/or (3) to protect a feature that is sensitive, rare, or unique in the landscape. Areas serving the purposes of (1) and (2) may move across the landscape as under-represented conditions change, or may be fixed in area and manipulated to maintain the desired conditions. Areas serving the purposes of (3) are fixed in location.</i></p>	C	<p><b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b></p>	

<p><i>Forests of all sizes may be conducive to protection of fixed features, such as rock outcrops and bogs. Medium-sized and large forests may be more conducive than small forests to the maintenance of successional phases and disturbance patterns.</i></p> <p><i>While public lands (see Glossary) are expected to bear primary responsibility for protecting representative samples of existing ecosystems, FSC certification of private lands (especially those with large contiguous areas of forest) can contribute to such protection.</i></p> <p><i>In some cases, the forest owner or manager may designate set-asides by formal means (conservation easements or purchase of conservation areas) on lands other than the certified FMU. Any off-FMU designation will be made to better implement or meet regional, state, and landscape level forest ecosystem and wildlife habitat restoration needs, plans, and objectives.</i></p>			
<p>6.4.a. Forest owners or managers assess the adequacy of representation of their forest types in protected areas across the landscape. This assessment entails collaboration with state natural heritage programs; public agencies; regional, landscape, and watershed planning efforts; universities; and/or local conservationists. It may also include gap analysis.</p>	C	<ul style="list-style-type: none"> <li>• The five existing wilderness areas cover many of the forest types found on MTHNF – the proposed Legacy Act would add more</li> <li>• Research Natural Areas are specifically designed to protect unique resource attributes; there are 3 Research Natural Areas (RNAs) on MTHNF</li> <li>• Bull Run Watershed has a RNA but the entire watershed is managed as a de-facto set aside/wilderness area; it is a biologically unique area because it is the southernmost range of some plant species</li> <li>• There is a set-aside for the most northerly extension of sugar pine</li> <li>• LSRs and RNAs were the result of this type of assessment; RARE II (Roadless Area Review &amp; Evaluation) was the process by which roadless/underdeveloped areas were evaluated and designated as wilderness – this process involved collaboration.</li> <li>• The 10 year planning process is specifically designed to identify zones and suitability of lands; there are criteria to develop representative samples</li> <li>• Collaboration with groups is required for these analyses – RNA development required collaboration with Nature Serve</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>6.4.b. Where existing protected areas within the landscape are not of a size and configuration to serve one or more of the three purposes described in the applicability note above, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable areas that serve these purposes. The size and arrangement of on-site and off-site representative sample areas are documented.</p>	C	<ul style="list-style-type: none"> <li>• See comments above; when a forest botanist was interviewed regarding this matter, his opinion was that there were no unique forest types underrepresented on the MTHNF.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

<p>6.4.c. The size and extent of representative samples on public lands being considered for certification is determined through a science-based (e.g., gap analysis, regional reserve design principals and methodologies), transparent planning process that is accessible and responsive to the public.</p> <p><b>Note: Failure to meet the provisions of 6.4.c. or 6.4.d. is a major failure (fatal flaw) for mid- and large-sized public forests.</b></p>	C	<ul style="list-style-type: none"> <li>• Legacy Bill: includes several more wilderness area set-asides. The process is transparent and accessible by the public.</li> <li>• The RARE II process of roadless area inventory involved extensive public input.</li> <li>• RNA designation occurred through a science-based process.</li> <li>• When the Forest Service is considering any type of designation, public meetings are held, stakeholder consultation is undertaken, etc.</li> <li>• LSRs came out of the NW Forest Planning process; “option 9” had an EIS (NEPA process).</li> </ul>	•
<p>6.4.d. Managers of large, conterminous public forests (<i>see Glossary</i>) establish and maintain representative protected areas sufficient in size to maintain species dependent on interior core habitats.</p> <p><b>Note: Failure to meet the provisions of 6.4.c. or 6.4.d. is a major failure (fatal flaw) for mid- and large-sized public forests.</b></p>	C	<ul style="list-style-type: none"> <li>• See above; Wilderness Areas, roadless areas</li> <li>• The auditors feel that MTHNF is well in conformance with this indicator</li> </ul>	•
<p><b>C6.5. Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.</b></p> <p><i>Applicability note: Soil cover and fertility are maintained in a condition that is sufficient to: (1) minimize soil erosion, (2) protect soil microbial communities, (3) protect inherent site productivity, (4) protect surface water quality, and (5) protect the natural processes in aquifers. The type and extent of canopy cover and groundcover required to accomplish the above is dependent on the following: slope; stability of the soil; potential for soil compaction; and characteristics of the climate, such as the intensity and frequency of precipitation.</i></p>	C	<p><b>Despite 5 non conformances at the indicator level, the audit team concludes that there is adequate conformance overall to Criterion 6.5</b></p>	
<p><b><u>Logging and Site Preparation</u></b></p> <p>6.5.a. Logging operations and the use of roads and skid trails occur only when soil compaction, erosion, and sediment transport do not result in degradation of water quality, site productivity, or habitats.</p> <p><i>For example, soils are either dry enough or frozen enough to minimize disturbance and compaction.</i></p>	C	<ul style="list-style-type: none"> <li>• Impacts on soil are analyzed under NEPA – CE/environmental assessments/EIS</li> <li>• The FS has series of BMPs broken down by timber management, water quality protection, and fuels management. These BMPS guide all plans and sales.</li> <li>• Contracts with timber purchasers consist of 3 parts: A) Administrative/record keeping; B) BMPs that apply nationally, and C) Specific contract clauses that tie to BMPs; these are the site-specific “C-Provisions”</li> <li>• C Provisions are effective and enforced, as well as conservative: zone widths are quite wide (ex. 100’ on intermittent stream channels)</li> </ul>	•
<p>6.5.b. Logging damage to regeneration and residual trees is minimized during harvest operations.</p>	NC	<ul style="list-style-type: none"> <li>• Some amounts of defect in the remaining stand is desirable from a wildlife standpoint (creating habitat elements) for example woodpeckers like a certain degree of soft wood</li> <li>• When harvesting in humid, westside forests, it does</li> </ul>	<ul style="list-style-type: none"> <li>• The standard is that no more than 10% of residual trees are damaged.</li> <li>• Based on a small sample of site visits, auditors noted more damage of residuals than necessary. The FS should initiate effort through contracts to</li> </ul>

		not take much to remove some bark from surrounding trees.	<p>reduce residual stand damage</p> <ul style="list-style-type: none"> <li>Minor CAR 2006.9</li> </ul>
6.5.c. Areas in which the risk of landslides is extreme (considering factors, such as slope, soil, and concavity), are neither logged nor roaded.	C	<ul style="list-style-type: none"> <li>MTHNF has been mapped for landslide hazard as part of the watershed analyses</li> <li>If an area is mapped as High Landslide Hazard, MTHNF does not perform any harvesting/road construction.</li> <li>A geologist and soil scientist perform an assessment on every timber sale. Sales do not occur in areas of high risk.</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>
6.5.d. On sites with a high risk of landslides, the forest owner or manager assures that such risks will not be exacerbated by management operations, especially where landslide “runout” may affect water bodies.	C	<ul style="list-style-type: none"> <li>See above</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>
<p>6.5.e. In order to minimize soil disturbance, silvicultural techniques and logging equipment are selected in accordance with slope and the hazard rating for soil erosion.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> <li><i>On slopes greater than 30 percent, ground-based yarding is used only when it is possible to do so without exacerbating soil erosion.</i></li> <li><i>On slopes greater than 50%, cable or helicopter yarding is used if it is technically feasible and will not result in adverse environmental effects due to the management operations.</i></li> </ul>	C	<ul style="list-style-type: none"> <li>Ground based yarding is used on gentler slopes; there is a switch to cable or helicopter yarding at approximately 30% slopes</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>
<p>6.5.f. Plans for site preparation either minimize impacts to forest resources or specify the following mitigations:</p> <p>(1) Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard.</p> <p>(2) Scarification of soils is limited to the minimum necessary to achieve successful regeneration of desired species.</p> <p>(3) Topsoil is minimally disturbed.</p>	C	<ul style="list-style-type: none"> <li>The FS does not perform scarification</li> <li>Field observations confirm all 3 elements of 6.5.f</li> <li>Slash is only concentrated when trying to create microhabitat.</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>
<p><b><u>Transportation System (including permanent and temporary haul roads, skid trails, and landings)</u></b></p> <p>6.5.g. The transportation system is pre-planned, designed, located, constructed, maintained, and/or reconstructed to minimize the extent and impact of the system and its potential cumulative adverse effects:</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> <li><i>As a part of watershed assessments on public lands, habitats for salmonids and other threatened and endangered aquatic species are identified. If shown to be necessary, road density is reduced in such habitats and/or</i></li> </ul>	NC	<ul style="list-style-type: none"> <li>The current road system is well located and designed and is mostly still in good enough condition that serious erosion problems are not occurring, yet, as a result of insufficient maintenance</li> <li>Much of the road system was paved in the past, which is a large factor in limiting erosion from the road surface</li> <li>There is an active road decommissioning program in the Bull Run Watershed, but no funding for similar work elsewhere</li> </ul>	<ul style="list-style-type: none"> <li>Roughly half the MTHNF road system is not needed for current and anticipated management activities</li> <li>The FS road crew was eliminated due to budget cuts in September 2005</li> <li>The FS has its own <i>plan</i> showing which roads should be abandoned, but this plan needs to go through the NEPA process with public involvement before it can be approved and acted upon.</li> <li>When asked, some FS employees acknowledge that road maintenance funding is not adequate to</li> </ul>

<p><i>mitigated within the watershed.</i></p> <ul style="list-style-type: none"> <li>▪ <i>Roads, landings, and skid trails are minimized.</i></li> <li>▪ <i>Displacement of soil, sedimentation of streams, and impacts to water quality are minimized.</i></li> <li>▪ <i>Patches of habitat and migration corridors are conserved.</i></li> <li>▪ <i>Roads constructed across slopes in excess of 60 percent are full bench cuts or with minimal side-cast.</i></li> <li>▪ <i>Roads are built on flat areas or stable slopes.</i></li> <li>▪ <i>The integrity of riparian zones and buffers surrounding other valuable ecological elements are conserved (e.g., wetlands, habitat for sensitive species, and interior old-growth forest).</i></li> <li>▪ <i>Permanent roads have structures to control soil erosion year-round and are managed under a winter maintenance plan.</i></li> <li>▪ <i>Cooperative transportation planning with agencies, such as watershed councils, is used to minimize negative cumulative environmental impacts across the landscape.</i></li> </ul>			<p>maintain the current transportation system.</p> <ul style="list-style-type: none"> <li>• Minor CAR 2006.10</li> </ul>
<p>6.5.h. Landings are designed and constructed to minimize soil erosion.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Landings are located on ecologically suitable sites.</i></li> <li>▪ <i>Landings are limited to the smallest practical safe area.</i></li> <li>▪ <i>Landings are sloped to divert runoff to non-erosive areas.</i></li> <li>▪ <i>Landings are seeded and mulched or covered with slash after use.</i></li> </ul>	C	<ul style="list-style-type: none"> <li>• The audit team finds no concerns regarding the placement of landings</li> <li>• Landings in MTHNF timber sales are not excessively sized for their use/purpose</li> <li>• The largest potential impact would be placement near watercourses – but regulations ensure this does not occur.</li> <li>• The audit team observed numerous, unneeded, old landings and roads, which had been ripped and stabilized during recent projects</li> </ul>	
<p>6.5.i. Access to temporary and permanent roads is controlled to minimize impacts to soil and biota while simultaneously allowing legitimate access as addressed by Principles 3 &amp; 4 and identified in the management plan.</p> <p><i>For example: Roads without a weather resistant surface (e.g., soil, or native-surfaced roads) are used only during periods of weather when conditions are favorable to minimize road damage, surface erosion, and sediment transport.</i></p> <p>Access is restricted to roads that are not immediately needed for purposes of management.</p>	NC	<ul style="list-style-type: none"> <li>• Gates and berms/barriers were noted in the field to prevent unauthorized road access of passenger vehicles</li> </ul> <p><i>Examples:</i></p> <ul style="list-style-type: none"> <li>• Key road corridors on the Clackamas RD were gated</li> <li>• The Mill Creek watershed down to The Dalles had “Do Not Enter Watershed” signs posted every 100 feet as well as gates on every road that entered</li> <li>• Not brushing has been an effective way to close roads on the westside</li> </ul>	<ul style="list-style-type: none"> <li>• The FS cannot control unauthorized OHV/ATV access as effectively as in the past due to budget limitations.</li> <li>• In the Ladee Flat area, signs will be posted only to be taken down by OHV users almost immediately.</li> <li>• The Transportation Management Plan is to be completed by 2009, but there is not much work being completed currently. This will create new road designations; for example re-classifying a road from 3 to 2 (high clearance vehicles) allows for lower maintenance intensity</li> <li>• Minor CAR 2006.11:</li> <li>• See Additional Consideration 1.5.1. for matters pertaining to OHV/ATV overuse.</li> </ul>
<p>6.5.j. Failed drainage structures or other areas of active erosion caused by roads and skid trails are identified, and measures are taken to correct the drainage and erosion problems.</p>	NC	<ul style="list-style-type: none"> <li>• The FS has attempted to compensate for the loss of the road crew by having every employee do an informal survey of roads and drainages as they perform their usual duties in the field.</li> <li>• There is not an immediate impact on water quality,</li> </ul>	<ul style="list-style-type: none"> <li>• Budget limitations &amp; the lack of a road crew make it difficult to maintain drainage structures and check for erosion.</li> <li>• Road grading and mowing are not kept up-to-date.</li> <li>• At present, riparian resources are being protected.</li> </ul>

		but it will become an issue in the future.	However, the auditing team is concerned that the lack of road upkeep, particularly, will make the situation worse over time <ul style="list-style-type: none"> <li>• Minor CAR 2006.12.</li> </ul>
6.5.k. Access is restricted and erosion is controlled on infrequently used roads.	C	<ul style="list-style-type: none"> <li>• Access to infrequently used roads on MTHNF is restricted in many cases by gates, as well as by revegetation (roads become enclosed).</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
6.5.l. Unnecessary roads are permanently decommissioned or put to bed.  <i>For example:</i> <ul style="list-style-type: none"> <li>▪ Bridges and culverts are removed; water bars are installed.</li> <li>▪ Slopes are re-contoured and/or re-vegetated.</li> <li>▪ Ecologically functional drainage patterns are established.</li> </ul>	NC	<ul style="list-style-type: none"> <li>• The only active road decommissioning program is in the Bull Run Watershed, because this is the only work of this type, which has been funded</li> </ul>	<ul style="list-style-type: none"> <li>• Neighboring county commissioners, as well as the public, are in favor of keeping roads open.</li> <li>• MTHNF does have a program of road abandonment (example: Bull Run road decommissioning), but needs to undergo the NEPA process to formally inventory/review which roads are no longer needed (See 6.5.g).</li> <li>• Minor CAR 2006.13</li> </ul>
<b><u>Stream and Water Quality Protection</u></b>			
<p><i>Applicability Note: The following water quality requirements of this standard are superceded when and where state or federal laws, regulations, or other contractual requirements are more stringent. This section uses the following definitions:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Category A stream: A stream that supports or can support populations of native fish and/or provides a domestic water supply.</i></li> <li>▪ <i>Category B stream: Perennial streams that do not support native fish and are not used as a domestic water supply.</i></li> <li>▪ <i>Category C stream: An intermittent stream that never the less has sufficient water to host populations of non-fish aquatic species</i></li> <li>▪ <i>Category D stream: A stream that flows only after rainstorms or melting snow and does not support populations of aquatic species</i></li> </ul>			
6.5.m. Streams, vernal pools, lakes, wetlands, seeps, springs, and associated riparian areas are managed to maintain and/or restore hydrologic processes, water quality, and habitat characteristics ( <i>see NMFS (1996); state water quality standards; Karr (1981)</i> ), which may include: <ul style="list-style-type: none"> <li>▪ the capacity for water to infiltrate the soil</li> <li>▪ habitat for riparian species</li> <li>▪ moderating water temperature</li> <li>▪ controlling sedimentation</li> <li>▪ clean gravel for spawning</li> <li>▪ physical structures to protect the integrity of the stream channel,</li> <li>▪ including pools used by anadromous fish</li> </ul>	C	<ul style="list-style-type: none"> <li>• MTHNF places a strong emphasis on aquatic recovery</li> <li>• MTHNF has a network of riparian reserves/buffers required by the Northwest Forest Plan</li> <li>• Every watershed has a completed watershed analysis</li> <li>• Critical habitats, like the Hood River Basin have their own aquatic habitat restoration plan</li> <li>• The fisheries program publishes its own annual accomplishment report</li> <li>• The aquatic and fisheries programs are well funded and staffed</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
6.5.n. Forest owners or managers retain and recruit sufficient large, green trees; snags; understory vegetation; down logs; and other woody debris in riparian zones to provide shade, erosion control, and in-channel structures.	C	<ul style="list-style-type: none"> <li>• The FS employs very precautionary retention policies and streamside buffers.</li> <li>• Per Northwest Forest Plan; riparian reserves</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
6.5.o. For Category A streams, and for lakes and wetlands larger than one acre, an inner buffer zone is maintained. The inner buffer is at least 50 feet wide (slope distance) from the active high water mark (on both sides) of the stream channel and increases depending on forest type, slope stability, steepness, and terrain. Management activities in the inner buffer: <ul style="list-style-type: none"> <li>▪ maintains or restore the native vegetation</li> <li>▪ are limited to single-tree selection silviculture</li> <li>▪ retain and allows for recruitment of large live and dead trees for</li> </ul>	C	<ul style="list-style-type: none"> <li>• FS meets this Indicator with their Class I stream type requirements</li> <li>• Page C30 of the Northwest Forest Plan Standards and Guidelines discusses requirements for riparian reserves, which are essentially no-management areas.</li> <li>• Northwest Forest Plan dictates a 300' foot buffer (riparian reserve) for "Fish-bearing" streams (Category A)</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

<p>shade and stream structure</p> <ul style="list-style-type: none"> <li>▪ retain canopy cover and shading sufficient to moderate fluctuations in water temperature, to provide habitat for the full complement of aquatic and terrestrial species native to the site, and maintain or restore riparian functions</li> <li>▪ exclude use of heavy equipment, except to cross streams at designated places, or where the use of such equipment is the lowest impact alternative</li> <li>▪ avoid disturbance of mineral soil; where disturbance is unavoidable, mulch and seed are applied before the rainy season</li> <li>▪ avoid the spread of pathogens and noxious weeds</li> <li>▪ avoid road construction and reconstruction</li> </ul>			
<p>6.5.p. For Category A streams, and for lakes and wetlands larger than one acre, an outer buffer zone is maintained. This buffer extends from the outer edge of the inner buffer zone to a distance of at least 150 feet from the edge of the active high water mark (slope distance, on both sides) of the stream channel. In this outer buffer, harvest occurs only where:</p> <ul style="list-style-type: none"> <li>▪ single-tree or group selection silviculture is used</li> <li>▪ post harvest canopy cover maintains shading sufficient to moderate fluctuations in water temperature, provide habitat for the full compliment of aquatic and terrestrial species native to the site, and maintain or restore riparian functions</li> <li>▪ new road construction is avoided and reconstruction enhances riparian functions and reduces sedimentation</li> <li>▪ disturbance of mineral soil is avoided; where disturbance is unavoidable, mulch and seed are applied before the rainy season</li> </ul>	C	<ul style="list-style-type: none"> <li>• The FS watercourse buffer policies meet this indicator, as required by the Northwest Forest Plan</li> </ul>	
<p>6.5.q. For Category B streams, a 25-foot (slope distance) inner buffer is created and managed according to provisions for inner buffers for Category A. A 75-foot (slope distance) outer buffer (for a total buffer of 100 feet) is created and managed according to provisions for outer buffer for Category A (<i>see 6.5.n</i>).</p>	C	<ul style="list-style-type: none"> <li>• The FS watercourse buffer policies meet this indicator, see Northwest Forest Plan Standards and Guidelines</li> <li>• There is at least a 150 foot buffer for perennial Category B streams.</li> </ul>	
<p>6.5.r. For Category C streams, and for lakes and wetlands smaller than one acre, a buffer zone 75 feet wide (on both sides of the stream) is established that constrains management activities to those that are allowed in outer buffer zones of Category A streams.</p>	C	<ul style="list-style-type: none"> <li>• The FS watercourse buffer policies meet this indicator, see Northwest Forest Plan Standards and Guidelines</li> <li>• There is at least a 100 foot buffer for Category C and D streams.</li> </ul>	
<p>6.5.s. For Category D streams, management:</p> <ul style="list-style-type: none"> <li>▪ maintains root strength and stream bank and channel stability</li> <li>▪ recruits coarse wood to the stream system</li> <li>▪ minimizes management-related sediment transport to the stream system</li> </ul>	C	<ul style="list-style-type: none"> <li>• The FS watercourse buffer policies meet this indicator, see Northwest Forest Plan Standards and Guidelines</li> <li>• There is at least a 100 foot buffer for Category C and D streams.</li> </ul>	
<p>6.5.t. Grazing by domestic animals is controlled to protect the species composition and viability of the riparian vegetation and the banks of the stream channel from erosion.</p> <p><i>For example, the numbers of livestock, as well as the seasonality and duration of grazing, are controlled to protect the aquatic-riparian habitat, with special emphasis afforded sensitive aquatic and</i></p>	C	<ul style="list-style-type: none"> <li>• There are 5 grazing allotments on MTHNF; all are on the eastside.</li> <li>• MTHNF has an active fencing program, and has collaborated with CTWS and Americorps on the project.</li> <li>• Fisheries biologists actively monitor watercourses in</li> </ul>	

<p><i>riparian species.</i></p>		<p>range allotments for adverse effects.</p> <ul style="list-style-type: none"> <li>The Long Prairie Allotment was only at 50% of AUM (animal unit month) capacity and the allottees had waved use during a number of recent years</li> </ul>	
<p>6.5.u. Stream crossings are located and constructed to minimize fragmentation of aquatic habitat (<i>see Glossary</i>), maintain water quality, and either to accommodate a 100-year peak flood event or to limit the consequences of an unavoidable failure. Road crossings, dams, and other human-made structures that impede fish passage are removed or modified to enable passage, taking legal or environmental constraints into account.</p> <p><i>For example:</i></p> <ul style="list-style-type: none"> <li>Crossings of riparian management zones are minimized.</li> <li>Stream crossings are installed at an angle that causes the least ecological disturbance to the waterway.</li> <li>Culverts allow free passage of aquatic organisms.</li> </ul>	C	<ul style="list-style-type: none"> <li>One FS fisheries biologist stated that forestwide, there are only 5 passage barriers to anadromous fish (far exceeding regional norms)</li> <li>Stream crossings are designed to withstand 100-year floods</li> </ul>	<ul style="list-style-type: none"> <li>One example was seen in the field of a perched culvert</li> <li>Forestwide, there are 400 passage barriers to <i>resident fish</i></li> <li>REC 2006.11</li> </ul>
<p><b>C6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</b></p>	C	<p><b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b></p>	
<p>6.6.a. Forest owners and managers demonstrate compliance with FSC Policy paper: “Chemical Pesticides in Certified Forests, Interpretation of the FSC Principles and Criteria, July 2002” and comply with prohibitions and/or restrictions on World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement.</p>	NC	<ul style="list-style-type: none"> <li>The FS has done an extensive risk analysis, with external experts, of the chemicals they use for noxious weed control</li> <li>The FS handbook provides guidance on how to perform these risk analyses</li> <li>MTHNF is almost done with an EIS on noxious weed control, focusing on chemical control</li> </ul>	<ul style="list-style-type: none"> <li>MTHNF is currently using 5 chemicals. Two of these, Dicamba and Strychnine, are on the FSC prohibited chemicals list.</li> <li>There are several more chemicals proposed for use on MTHNF</li> <li>Minor CAR 2006.14:</li> </ul>
<p>6.6.b. Forest owners or managers employ silvicultural systems, integrated pest management, and strategies for controlling pests and/or unwanted vegetation that result in the least adverse environmental impact, with the goal of reducing or eliminating chemical use. Chemical pesticides, fungicides, and herbicides are used only when and where research or empirical experience has demonstrated that less environmentally hazardous, non-chemical pest/disease management practices are ineffective.</p> <p><i>For example, components of silvicultural systems, integrated pest management, and strategies for controlling vegetation may include:</i></p>	C	<ul style="list-style-type: none"> <li>MTHNF only uses chemicals for noxious weed control and one district uses chemicals for pocket gopher control; there is no use for site preparation or other silvicultural purposes.</li> <li>Chemical use must always be reviewed in a NEPA analysis</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>

<ul style="list-style-type: none"> <li>▪ <i>creation and maintenance of habitat that discourages pest outbreaks</i></li> <li>▪ <i>creation and maintenance of habitat that encourages natural predators</i></li> <li>▪ <i>evaluation of pest populations and establishment of action thresholds</i></li> <li>▪ <i>diversification of species composition (see Glossary) and structure</i></li> <li>▪ <i>use of mechanical methods</i></li> <li>▪ <i>use of prescribed fire</i></li> </ul>			
<p>6.6.c. When and where chemicals are applied, the most environmentally safe and efficacious chemicals are used. Chemicals are narrowly targeted, and minimize affects on non-target species.</p>	C	<ul style="list-style-type: none"> <li>• There have been national and regional EIS for noxious weeds treatment. The chemicals used on MTHNF for noxious weeds have been analyzed extensively.</li> <li>• No licensed applicators are employed by the FS: Licensed county and state applicators are used, as well as Bonneville Power applicators for the power lines.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>6.6.d. Chemicals are used only when and where they pose no threat to supplies of domestic water, aquatic habitats, or habitats of Rare species.</p>	C	<ul style="list-style-type: none"> <li>• There are standards and guidelines for chemical application associated with noxious weed management with very conservative buffers.</li> </ul>	
<p>6.6.e. When chemicals are used, the effects and impacts are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals.</p>	C	<ul style="list-style-type: none"> <li>• MTHNF noxious weed control EIS has a monitoring component which incorporates adaptive management.</li> <li>• There is a zone-level pest specialist; the FS research division &amp; regional office both monitor pest outbreaks</li> <li>• Monitoring occurs at least every year; sometimes twice a year</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>6.6.f. Forest owners or managers develop written strategies for control of pests as a component of the management plan (criterion 7.1), which comply with official FSC policy.</p>	C	<ul style="list-style-type: none"> <li>• Written strategies for noxious weeds can be found in the noxious weed control EIS, which has site-specific noxious weed treatments</li> </ul>	<ul style="list-style-type: none"> <li>• The only observed non-conformances with FSC policy are the 3 chemicals used/proposed for use: see 6.6.a.</li> </ul>
<p>6.6.g When chemicals are used, a written prescription is prepared that fully describes the risks and benefits of their use and the precautions that workers will employ.</p>	C	<ul style="list-style-type: none"> <li>• Risks and precautions on a site by site basis are found in the noxious weeds EIS.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p><b>C6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.</b></p>	C	<p><b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b></p>	
<p>6.7.a Forest Owners and managers prevent the unintended release of chemicals, petroleum products, containers and nonorganic wastes, and minimize health and environmental risks due to their disposal.</p> <p><i>For example forest owners and managers minimize health and environmental risks by:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Immediately containing spills of hazardous material, as required by applicable regulations, and then engaging qualified personnel to perform the appropriate removal and remediation.</i></li> <li>▪ <i>Routinely checking equipment for leaking fluids. Broken</i></li> </ul>	C	<ul style="list-style-type: none"> <li>• Such technical specifications are covered under the “C provisions” of each timber sale</li> <li>• A new plan for controlling noxious weeds is near completion. This plan limits the types of herbicides which can be used, and provides detailed handling and cleanup procedures</li> <li>• The MTHNF has not used insecticides for well over a decade (A number of adjoining landowners are still unhappy about the Forest’s decision not to use bt to help control a spruce budworm epidemic over a decade ago)</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

<p>and/or leaking equipment and parts are repaired or removed from the forest; discarded parts are taken to a designated disposal facility.</p> <ul style="list-style-type: none"> <li>▪ Parked equipment outside of riparian management zones and away from vernal pools and supplies of ground water to prevent toxic fluids from leaking into them</li> <li>▪ Disposing of contaminated water and containers in a location and manner that is environmentally sound.</li> </ul>			
6.7.b. In the event of a spill of hazardous material, forest owners or managers immediately contain the material, report the spill as required by applicable regulations, and engage qualified personnel to perform the appropriate removal and remediation.	C	<ul style="list-style-type: none"> <li>• The new noxious weed control plan contains detailed spill containment and remediation procedures</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
6.7.c. Equipment is routinely checked for leaking fluids. Broken and/or leaking equipment and parts are repaired or removed from the forest; discarded parts are taken to a designated disposal facility.	C	<ul style="list-style-type: none"> <li>• These issues are addressed under “B provisions” in sale contracts</li> <li>• Operators routinely inspect machines to ensure they aren’t leaking hydraulic fluid</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
6.7.d. Equipment is parked outside of riparian management zones and away from vernal pools and supplies of ground water to prevent toxic fluids from leaking into them.	C	<ul style="list-style-type: none"> <li>• There are strict limits on how close to riparian areas equipment can be operated.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
6.7.e. If washing chemical containers is necessary, the contaminated water and containers are disposed of in a location and manner that is environmentally sound.	C	<ul style="list-style-type: none"> <li>• Containers cannot be filled in riparian areas</li> </ul>	
<p><b>C6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.</b></p> <p><i>Applicability Note: Genetically improved organisms (e.g., Mendelian crossed) are not considered to be genetically modified organisms, and may be used. (See FSC policy on genetically modified organisms at <a href="http://www.fsc.org/en/whats_new/documents/Docs_cent/2">http://www.fsc.org/en/whats_new/documents/Docs_cent/2</a>. The prohibition of genetically modified organisms applies to all organisms including trees.</i></p>	C	<p><b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b></p>	
6.8.a. Exotic (i.e., non-indigenous), non-invasive predators or biological control agents are used only as part of a pest management strategy for the control of exotic species of plants, pathogens ( <i>see Glossary</i> ), insects, or other animals when other pest control methods are ineffective, or can reasonably be expected to be proven ineffective. Such use is contingent on peer-reviewed scientific evidence that the agents in question are noninvasive and are safe for indigenous species.	C	<ul style="list-style-type: none"> <li>• MTHNF is not currently deploying biological control agents</li> <li>• Cinnabar moth is used to control Tansy and it is released by the Oregon Department of Agriculture and analyzed by Animal and Plant Health Inspection Service (APHIS)</li> <li>• When such biological control agents are used, appropriate risk and environmental analysis are performed.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<b>C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</b>	C	<p><b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b></p>	
6.9.a. The use of exotic plant species ( <i>see Glossary</i> ) is contingent on peer-reviewed scientific evidence that any species in question is non-	C	<ul style="list-style-type: none"> <li>• Annual grass seed from the Willamette Valley is used for erosion control (but is gone after a year)</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

invasive and does not diminish biodiversity. If non-invasive exotic plant species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.		<ul style="list-style-type: none"> <li>• When straw is used, it is only from certified weed-free sources.</li> <li>• No exotic tree species are used.</li> </ul>	
6.9.b. Forest owners or managers develop and implement control measures for invasive exotic plants.	C	<ul style="list-style-type: none"> <li>• There is an EIS for noxious weeds control</li> <li>• There is an active program of public education on identification, dispersal, and prevention of noxious weeds.</li> <li>• The FS routinely inspects the undercarriages of vehicles to prevent the spread of noxious weeds.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p><b>6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:</b></p> <p><b>a) Entails a very limited portion of the forest management unit; and</b></p> <p><b>b) Does not occur on High Conservation Value Forest areas; and</b></p> <p><b>c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</b></p> <p><i>Note: The Working Group considers this criterion sufficiently explicit and measurable. Indicators are not required.</i></p>	C	<ul style="list-style-type: none"> <li>• In general, the FS does not convert forests to plantations.</li> <li>• The only possible conversion would be to create ski slopes – and this only entails a very limited portion of the unit per (A)</li> </ul>	<ul style="list-style-type: none"> <li>• There is permanent conversion of forest areas to ski runs</li> <li>• Ski area revenues generally go straight to the federal treasury; not back into MTHNF, which goes against (c)</li> <li>• Minor CAR 2006.15</li> </ul>
<b>P7 A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</b>			
<p><b>7.1. The management plan and supporting documents shall provide:</b></p> <p><b>a) Management objectives.</b></p> <p><b>b) Description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</b></p> <p><b>c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories.</b></p> <p><b>d) Rationale for rate of annual harvest and species selection.</b></p> <p><b>e) Provisions for monitoring of forest growth and dynamics.</b></p> <p><b>f) Environmental safeguards based on environmental assessments.</b></p> <p><b>g) Plans for the identification and protection of rare, threatened and endangered species.</b></p> <p><b>h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.</b></p> <p><b>i) Description and justification of harvesting techniques and equipment to be used.</b></p> <p><i>Applicability Note: The management plan may consist of a variety of documents not necessarily unified into a single planning document but which, nevertheless, represents an integrated strategy for managing the forest.</i></p>	C	<p><b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate performance.</b></p> <p>Collectively, the MTHNF “management plan” incorporates many planning documents, including:</p> <ul style="list-style-type: none"> <li>• MTHNF Forest Plan</li> <li>• Northwest Forest Plan</li> <li>• Watershed Assessments</li> <li>• Project planning</li> <li>• Reconciliation Document (MTHNF &amp; NWFP)</li> <li>• Roadmap in watershed analysis</li> </ul>	
<b>7.1.a. Management objectives</b>			
7.1.a.1.A written management plan is prepared that: (1) includes the landowner's vision (ecological, silvicultural, social,	C	<ul style="list-style-type: none"> <li>• Clear goals, objectives, and desired future conditions</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

and economic), desired future conditions, potential future outcomes, goals, and objectives, as well as short-term and long-term actions and (2) incorporates strategies for the maintenance, enhancement, and/or restoration of forest resource. The actions and objectives are specific, achievable, measurable, and adaptive. (The elements of a comprehensive forest management plan are found in Appendix H.)		are found in the MTHNF Forest Plan, Watershed analyses, and the Northwest Forest Plan • MTHNF plan; chapters 1, 4.1-4.11	
<b>7.1.b. Description of forest resources to be managed, environmental limitations, land use and ownership status, socioeconomic conditions, and profile of adjacent lands</b>		•	•
7.1.b.1. Using data collected proportionally to the scale and intensity of management, the forest owner or manager describes the following resources: ▪ timber ▪ fish and wildlife ▪ harvested non-timber forest products (e.g., botanical and mycological) ▪ non-economic natural resources	C	• Resources conditions are described in the MTHNF Forest Plan: • 2-19, 2-21, 2-22 • 4-131	•
7.1.b.2. Descriptions of special management areas, Rare species and their habitats, Rareplant communities, and other ecologically sensitive features in the forest are included in the management plan.	C	• Special management areas, rare species are described in MTHNF Forest Plan: • Chapter 4, 135-206 • Additional studies: LSR plans	•
7.1.b.3. A description of past land uses is included in the management plan and incorporated into the goals and objectives.	C	• Watershed analyses and LSR analyses	•
7.1.b.4. The legal status of the forest and its resources is identified in the management plan (e.g., ownership, usufruct rights, treaty rights, easements, deed restrictions, and leasing arrangements).	C	• Legal status is described in the MTHNF Forest Plan introduction • Memorandum of Understanding with the Confederated Tribes of Warm Springs.	•
7.1.b.5. Relevant cultural and socioeconomic issues (e.g., traditional and customary rights of use, access issues, recreational uses, and issues of employment), conditions (e.g., composition of the workforce, stability of employment, and changes in forest ownership and tenure), and areas of special significance (e.g., ceremonial and archeological sites) are identified in the management plan.	C	Cultural and social issues are described in the MTHNF Forest Plan: • Chapter 4, 118 • Chapter 2-24	•
7.1.b.6. Landscape-level considerations within the ownership and among adjacent and nearby lands, including major bodies of water, critical habitats, and riparian corridors shared with adjacent ownerships, are incorporated in the management plan.	C	• The Northwest Forest Plan & Watershed Analyses give considerations to these elements.	•
<b>7.1.c. Description of silvicultural and/or other management system</b>		•	•
7.1.c.1. The choice of silvicultural system(s) and prescriptions are based on the integration of ecological and economic characteristics (e.g., successional processes, soil characteristics, existing species composition and physical structures, desired future conditions, and market conditions) ( <i>see also 6.3.a</i> ).	C	• Silviculture is covered in a general manner in the Forest Plan; more detailed analyses occur in the EAs for each timber sale.	•
7.1.c.2. Prescriptions are prepared prior to harvesting, site preparation, pest control, burning, and planting and are made available to people who carry out the prescriptions.	C	• Same as above: Prescriptions are prepared and included for each project's environmental assessment/EIS	•

<b>7.1.d. Rationale for the rate of annual harvest and species selection</b>		•	•
7.1.d.1. The management plan is based on the best available data on growth, yield, stocking, and regeneration. <i>(see also 5.6.b).</i>	C	• The Continuous Vegetation Survey; now FIA, is used as the basis for growth and stocking information.	•
7.1.d.2. Species selection meets the economic goals and objectives of the forest owner or manager, while maintaining or improving the ecological composition, structures, and functions of the forest.	C	• Not much planting is done on MTHNF; seeds come from local provenances. • The rationale for species preferences is described in EA/EIS	•
<b>7.1.e. Provisions for monitoring forest growth and dynamics (see also Principle 8)</b> <i>Note: The Working Group considers this criterion sufficiently explicit and measurable. Indicators are not required.</i>	C	• MTHNF Forest Plan, Chapter 5-6 • CVS/FIA	•
<b>7.1.f. Environmental safeguards based on environmental assessments (see also Criterion 6.1.)</b> <i>Note: The Working Group considers this criterion sufficiently explicit and measurable. Indicators are not required.</i>	C	• There is an EIS for MTHNF Forest Plan, and all plan amendments must go through the NEPA process. • NEPA process: Environmental Assessments occur to assess risk. • Standards and guidelines for the Northwest Forest Plan.	•
<b>7.1.g. Plans for the identification and protection of rare, threatened, and endangered species. (see also Criterion 6.3.)</b> <i>Note: The Working Group considers this criterion sufficiently explicit and measurable. Indicators are not required.</i>	C	• NW Forest Plan establishes Late Successional Reserves • MTHNF Forest Plan: 4-69	•
<b>7.1.h. Maps describing the forest resource base including protected areas, planned management activities, and land ownership.</b>		•	•
7.1.h.1. Appropriate to the scale and intensity of the operation, and to the relevance of the management of the FMU, the following maps are included in the management plan: <ul style="list-style-type: none"> <li>▪ property boundaries</li> <li>▪ roads</li> <li>▪ areas of timber production</li> <li>▪ forest types by age class</li> <li>▪ topography</li> <li>▪ soils</li> <li>▪ riparian zones</li> <li>▪ streams, springs, and wetlands</li> <li>▪ archaeological sites</li> <li>▪ areas of cultural and customary use</li> <li>▪ locations of and habitats for rare species</li> <li>▪ designated High Conservation Value Forests</li> </ul> <p>Maps of some features may be kept confidential to protect their integrity.</p>	C	• Extensive mapping has been done in GIS • Watershed analyses contain detailed maps	• MTHNF plan maps are lacking only in regards to High Conservation Value Forests (HCVF) maps (see Principle 9)
<b>7.1.i. Description and justification of harvesting techniques and equipment to be used. (see also Criterion 6.5)</b> <i>Note: The Working Group considers this criterion sufficiently explicit and measurable. Indicators are not required.</i>	C	• There are project-specific prescriptions which contain these justifications. • Contract specifications contain guidance.	•
<b>C7.2. The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and</b>	C	• Although there is non-conformance at indicator level, the audit team concludes there is conformance at	•

<p><b>technical information, as well as to respond to changing environmental, social and economic circumstances.</b></p>		<p>Criterion level due to multiple efforts to update watershed analyses, planning for specific projects, etc.</p> <ul style="list-style-type: none"> <li>• Amendments address new scientific and technical information</li> </ul>	
<p>7.2.a. Relevant provisions of the management plan are modified: (1) every 10 years or in accordance with the frequency of harvest for the stand or forest, whichever is longer; (2) in response to effects from illegal and/or unauthorized activities (e.g., damage to roads, depletion of timber and non-timber resources), (3) in response to changes caused by natural disturbances.</p>	NC	<ul style="list-style-type: none"> <li>• There are have been 15 amendments to the MTHNF Forest Plan; the 16<sup>th</sup> is noxious weeds</li> <li>• There are plans to update each of the Watershed Analyses</li> <li>• MTHNF is starting the process now of updating their entire Forest Plan, with a goal date of 2011.</li> <li>• “Management Plan” refers to the entire suite of documents pertaining to planning – by this rationale, there <i>are</i> up-to-date plans even if the “Forest Plan” itself has not been not formally updated.</li> </ul>	<ul style="list-style-type: none"> <li>• The Forest Plan was created originally in 1990 and is now considerably past due for a re-write, even in light of 15 plan amendments.</li> <li>• The Northwest Forest Plan which was incorporated into the MTHNF through Forest Plan Amendment #8 itself is now rather dated</li> <li>• Minor CAR 2006.16:</li> <li>• Although conformance was found at the Criterion level, a minor CAR (discretionary) is being issued</li> </ul>
<p><b>C7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.</b> <i>Note: The Working Group considers this criterion sufficiently explicit and measurable. Indicators are not required.</i></p>	C	<ul style="list-style-type: none"> <li>• Forest service employees receive extensive training in implementation of planning documents: for example, there is an entire week-long course devoted to NEPA training (1900-1901)</li> <li>• Contractors do not have much discretion - they have adequate training for what their required tasks are.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p><b>C7.4. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.</b> <i>Applicability Note: Forest owners or managers of private forests may withhold proprietary information (e.g., timber volumes by size and age class, marketing strategies, and other financial information). (see also Criterion 8.5)</i>  <i>Note: The Working Group considers this criterion sufficiently explicit and measurable. Indicators are not required.</i></p>	C	<ul style="list-style-type: none"> <li>• The MTHNF Stewardship Plan summarizes key elements of the Forest Plan</li> <li>• All FS documents are publicly available, and can be requested under FOIA if not already accessible.</li> </ul>	
<p><b>P8 Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.</b> <i>Applicability Note: On small and medium-sized forests, an informal, qualitative assessment may be appropriate. On large and/or intensively managed forests, formal, quantitative monitoring is probably required.</i></p>			
<p><b>C8.1. The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</b></p>	C	<p><b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b></p>	
<p>8.1.a. Implementation of the management plan is periodically monitored to assess:</p> <ul style="list-style-type: none"> <li>▪ the degree to which management vision, goals, and objectives have been achieved</li> <li>▪ deviations from the management plan</li> <li>▪ unexpected effects of management activities</li> <li>▪ social and environmental effects of management activities</li> </ul>	C	<ul style="list-style-type: none"> <li>• MTHNF produces an annual Monitoring and Evaluation Report which tracks implementation of the Forest Plan.</li> <li>• As a pilot forest under the LUCID initiative, MTHNF’s overall level of systematic monitoring—and reporting thereof—is quite exemplary</li> </ul>	

<p>8.1.b. Inventories noted under section 8.2 below, are updated over periods not to exceed ten years, or the harvest frequency on the ownership, whichever is longer. Relevant ecological indicators (e.g., the status of and capacity for regeneration, habitat qualities of rare species, impacts to the quality of soil and water) are monitored before and after field management activities take place. Detailed monitoring is implemented at sites of special ecological significance (<i>see Appendix G</i>).</p>	C	<ul style="list-style-type: none"> <li>Inventories are updated annually.</li> </ul>	
<p><b>8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators:</b>  <b>a) Yield of all forest products harvested.</b>  <b>b) Growth rates, regeneration and condition of the forest.</b>  <b>c) Composition and observed changes in the flora and fauna.</b>  <b>d) Environmental and social impacts of harvesting and other operations</b>  <b>e) Cost, productivity, and efficiency of forest management</b></p>		<p><b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b></p>	
<p><b>8.2.a. Yield of all forest products harvested</b></p>	C		
<p>8.2.a.1. The forest owner or manager maintains records of timber-harvest volumes.</p>		<p>Records of timber harvest volumes are maintained for each sale, and annual totals are summarized and reported in the annual monitoring report for the Mt. Hood National Forest</p>	
<p>8.2.a.2. The forest owner or manager maintains records of the yield of harvested non-timber forest products.</p>		<ul style="list-style-type: none"> <li>Some but not all non-timber forest products are tracked by harvest volume. Instead, records are kept of the number of permits.</li> </ul>	<ul style="list-style-type: none"> <li>No special monitoring for moss or mushroom harvest is done on Mt. Hood National Forest, although the lessons learned from such monitoring on nearby forests in the region are applied on the MTHNF</li> </ul>
<p>8.2.a.3. Significant, unanticipated removal (e.g., theft and poaching) of forest products is monitored, and recorded, and appropriate action is taken.</p>		<p>Significant poaching or theft is rare on MTHNF.</p>	
<p><b>8.2.b. Growth rates, regeneration, and condition of the forest</b></p>	C		
<p>8.2.b.1. An inventory system is maintained to monitor:</p> <ul style="list-style-type: none"> <li>growth, mortality, stocking, and regeneration of the timber</li> <li>stand composition and structure</li> <li>effects of disturbances to the resources (e.g., disease, wind, fire, damage by insects and/or mammals)</li> <li>abundance, regeneration, and habitat conditions of non-timber forest products</li> <li>characteristics of water quality, such as temperature, sedimentation, and chemical loads (<i>see Appendix G; Karr 1981</i>)</li> <li>characteristics of terrestrial and aquatic habitats</li> <li>Soil characteristics</li> </ul>	C	<ul style="list-style-type: none"> <li>Mt. Hood National Forest has long had a continuous forest inventory system (CVS) with a ten-year re-measurement period. This system is being phased out, with final measurements this year. In its place a customized version of the FIA plot system is being implemented that uses the FIA framework but involves increased plot intensity and additional measurements.</li> <li>Both CVS and FIA-based Continuous forest inventory (CFI) covers timber and non-timber vegetation</li> <li>There is a vegetation mapping process using remote sensing that is updated periodically; a new and more sophisticated “IMAP” approach is being developed; mapping of trees affected by insects and disease is done annually</li> <li>Stands with proposed treatments are inventoried as</li> </ul>	

		<p>part of the planning process to determine stocking, species composition, and stand structure</p> <ul style="list-style-type: none"> <li>• Remote sensing methods are used to develop risk assessment maps annually that incorporate fuel loading and forest health information</li> <li>• Ongoing water monitoring includes stream temperature, sediment loading, and aquatic surveys. The later is funded through the Forest Service Regional Office to ensure consistent procedures. Note: in FY 07 the R6 Monitoring Budget will be cut by \$3million which is at least a 20% cut.</li> <li>• Under NEPA all projects must incorporate monitoring of impacts. One example provided was the “Bull Run Road Decommissioning Monitoring” which included Procedural Monitoring, Water Quality Monitoring, and Water Quality Sampling designed to assess the effectiveness of BMP practices for protecting water quality at culvert removal sites. Results were sufficiently robust to determine that sediment increases generally occur during the first significant storm following completion of crossing removals, and then disappear. Benefits from decreased stream “flashiness” due to increased infiltration rates for “mulched” roads were discussed with auditors but not covered in this particular report.</li> </ul>	
<b>8.2.c. Composition and observed changes in the flora and fauna</b>			
8.2.c.1. Forest owners or managers periodically monitor and assess (1) their contribution toward recovery goals for threatened and endangered species in relation to changes in major habitats and populations, (2) changes in major habitat elements, and (3) presence and/or absence of and changes in the occurrence of Rare species.	NC	<ul style="list-style-type: none"> <li>• The FS does a thorough job of assessing rare fish and plant species.</li> <li>• FS fish biologists regularly exchange information with National Marine Fisheries Service (NMFS) and Oregon Department of Fish &amp; Wildlife (ODFW) as to their contribution to salmon recovery.</li> <li>• MTHNF managers regularly monitor spotted owl habitat trends.</li> </ul>	<ul style="list-style-type: none"> <li>• The FS is not as strong in assessing conditions for wildlife as they are in fisheries and botany</li> <li>• ODFW has reported to FS biologists that local deer herds are in decline and the 1990 Forest Plan established deer habitat management standards, but the Forest is no longer attempting to meet their own standards nor are they modifying practices to improve deer and elk populations.</li> <li>• Minor CAR 2006.17</li> </ul>
<b>8.2.d. Environmental and social impacts of harvesting and other operations</b>	C	<ul style="list-style-type: none"> <li>• The agency has been involved in pilot monitoring efforts: For example, for the LUCID project, MTHNF retained 2 PSU professors to complete a social impact assessment</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
8.2.d.1. The environmental impacts of site-disturbing activities (e.g., road construction and repair, harvesting, and site preparation) are monitored after completion.	C	<ul style="list-style-type: none"> <li>• The FS performs post-harvest inspections &amp; monitoring of other site-disturbing activities.</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
8.2.d.2. A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.	C	<ul style="list-style-type: none"> <li>• The FS has attempted to compensate for the loss of the road crew by having every employee do an informal survey of roads and drainages as they perform their usual duties in the field.</li> </ul>	<ul style="list-style-type: none"> <li>• Road crew eliminated; see 6.5.g.</li> </ul>

8.2.d.3. Generation or maintenance of local jobs and public responses to management activities are monitored.	C	<ul style="list-style-type: none"> <li>Public responses to management are monitored</li> </ul>	<ul style="list-style-type: none"> <li>REC 2006.12.</li> </ul>
8.2.d.4. The influence of forest management on the viability of forest-based livelihoods is monitored, especially in the case of large forest holdings.  <i>For example, the destination of forest resources is documented.</i>	C	<ul style="list-style-type: none"> <li>LUCID project; the FS monitors effects on local economy.</li> </ul>	<ul style="list-style-type: none"> <li>See REC 2006.12 under d.3. above</li> </ul>
8.2.d.5. The opportunity to jointly monitor sites of special significance ( <i>see also criteria 3.2 and 3.3</i> ) is offered to tribal representatives in order to determine adequacy of the management prescriptions.	C	<ul style="list-style-type: none"> <li>When sites of cultural significance are found, representatives from CTWS are invited to monitor and participate in management planning.</li> <li>There is multi-party monitoring with local stewardship groups</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>
<b>8.2.e. Cost, productivity, and efficiency of forest management</b>		<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li>REC 2006.13</li> <li>\$ return for unit of energy expended, particularly on boughs, should be analyzed.</li> </ul>
8.2.e.1. Forest owners and managers monitor cash flows, costs, revenues, profit margins, and other financial indicators, to assure long-term financial viability.	C	<ul style="list-style-type: none"> <li>R6 (Peggy Kain) tracks sale program costs and efficiency</li> <li>“Work Plan System” of Forest Service is a tool for aligning project plan budgets with overall budgets</li> <li>Mt. Hood National Forest has business staff, although most support functions are being centralized</li> </ul>	
8.2.e.2. Forest owners and managers take into account the economic benefits of all forest goods and services, including water quality, fish and wildlife, aesthetics, recreational uses, and carbon sequestration, and identify ways in which they might generate income.	C	<ul style="list-style-type: none"> <li>Degree to which certification is being considered shows consideration of economic benefits of forest goods and services.</li> <li>See “Northwest Forest Plan—the first 10 years (1994–2003): socioeconomic monitoring results. Gen. Tech. Rep. PNW-GTR 649”</li> <li>Forest Service has a group in the national office exploring payments for ecosystem services</li> </ul>	<ul style="list-style-type: none"> <li>Other forests are exploring more diverse benefits, e.g. Washington Department of Natural Resources &amp; carbon sequestration</li> </ul>
<b>C8.3. Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."</b> <i>Note: The Working Group considers this criterion sufficiently explicit and measurable. Indicators are not required.</i>	NC	<ul style="list-style-type: none"> <li></li> </ul>	<ul style="list-style-type: none"> <li>The audit team concludes that MTHNF is not in conformance with this Criterion, due to the fact that this is a certification case study. Were the Forest Service to undergo a real certification audit and were there no Chain-of-custody procedures in place at the time of the audit, there would be a CAR</li> <li>Major CAR 2006.3</li> </ul>
<b>C8.4. The results of monitoring shall be incorporated into the implementation and revision of the management plan.</b>	C	<b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b>	<ul style="list-style-type: none"> <li></li> </ul>
8.4.a. Discrepancies between outcomes (i.e., yields, growth, ecological changes) and desired future conditions (i.e., plans, projections, anticipated impacts) are appraised. Management plans and actions are revised to better achieve the desired future		<ul style="list-style-type: none"> <li>The Northwest Forest Plan was driven by regional monitoring results that indicated the need for changes to maintain and restore habitat for late-seral dependent</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>

<p>conditions.</p>		<p>species and listed fish</p> <ul style="list-style-type: none"> <li>• “Survey and Manage” provisions of the plan mandate an adaptive approach</li> <li>• Fifteen amendments have been made to the Mt. Hood National Forest Plan, some driven by monitoring results. For example, standards for watershed recovery were formerly based on canopy characteristics including canopy closure, DBH (diameter at breast height) and age. Monitoring of these showed that they did not correlate with results in the streams, so the use of fire regime indicators was adopted</li> <li>• Monitoring of noxious weeds led to the development of the <i>DRAFT EIS for Site Specific Invasive Plant Treatments</i>: <a href="http://www.fs.fed.us/r6/mthood/projects/">http://www.fs.fed.us/r6/mthood/projects/</a>. This is now in the comment period. If adopted it will become Forest Plan Amendment #16</li> </ul>	
<p><b>C8.5. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.</b></p> <p><i>Applicability Note: Forest owners or managers of private forests may withhold proprietary information (e.g., timber volumes and age classes, marketing strategies, and other financial information).</i></p>	<p>C</p>	<p><b>Over the breadth of Indicators that elaborate this Criterion, the audit team concludes that MTHNF operations can be considered to be in adequate conformance.</b></p>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>8.5.a. A summary of monitoring results is maintained up-to-date and is made available to the public on request, either at no cost or at a nominal price.</p>	<p>C</p>	<ul style="list-style-type: none"> <li>• Monitoring and Evaluation Report, Mt. Hood National Forest Land and Resource Management Plan, FY 2004; FY 2005 were provided to the audit team and used extensively during the evaluation</li> <li>• The annual monitoring reports are available on the web, and printed copies can be requested as well</li> </ul>	
<p><b>P9 Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</b></p> <p><b>High Conservation Value Forests are those that possess one or more of the following attributes:</b></p> <p><b>a) forest areas containing globally, regionally or nationally significant : concentrations of biodiversity values (e.g. endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance</b></p> <p><b>b) forest areas that are in or contain rare, threatened or endangered ecosystems</b></p> <p><b>c) forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control)</b></p> <p><b>d) forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health) and/or critical to local communities’ traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).</b></p> <p><i>Applicability note: Classification of a forest as a “high conservation value forest” (HCVF) does not automatically preclude active management. In addition to the forest types listed in sections (a) through (d) of the HCVF definition, HCVFs in the Pacific Coast region include:</i></p> <ul style="list-style-type: none"> <li>• forest types listed in Appendix D (i.e., rare communities in the region), unless further refined by consultations with heritage programs, local native plant societies, local experts, and NGOs</li> <li>• primary, late-successional, or old-growth forests (<i>see also criterion 6.3.</i>)</li> <li>• roadless areas (areas that have never had logging roads, skid trails, etc.) larger than 500 acres or that have unique attributes</li> <li>• habitats for rare species, and may include: <ul style="list-style-type: none"> <li>○ water catchments that provide water supplies to municipalities</li> <li>○ buffers and corridors within landscape-level plans that are critical to the maintenance of processes and functions of high conservation value areas (see also criteria 6.3 - 6.5); and</li> </ul> </li> </ul>			

- o native grasslands, wetlands, and other ecologically important non-forested sites within the forest.

*Note: The status of HCVFs on American Indian lands requires special consultation between certifying teams and the affected tribe or nation.*

<b>C9.1. Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</b>	NC	MTHNF managers need to create a HCVF crosswalk that demonstrates how their programs and policies meet the analytical requirements found in Principle 9	<b>The audit team concludes that in the absence of a crosswalk that demonstrates conformance the MTHNF operations cannot be found in conformance with this Criterion. Major CAR 2006.4</b>
9.1.a. Attributes and locations of High Conservation Value Forests are determined by the identification of globally, nationally, regionally, and locally unique HCV attributes ( <i>see Appendix D</i> ) that may be present in or adjacent to the forest, and their delineation by habitat descriptions and maps.	NC		An assessment of how the management of the Unit addresses the FSC concept of High Conservation Value Forests has not been completed using established HCVF procedures (such as the FSC HCVF Tool Kit). Areas that would likely qualify as HCVF have not been officially designated as such (e.g. wilderness areas, old-growth stands, municipal water supplies, roadless areas larger than 500 acres) Because such an assessment has not taken place, the audit team cannot confirm that all high conservation values on the forest are being adequately protected.
<b>C9.2. The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</b>	NC		<b>The audit team concludes that in the absence of a crosswalk that demonstrates conformance the MTHNF operations cannot be found in conformance with this Criterion. Major CAR 2006.4</b>
9.2.a. Consultations are held with stakeholders and scientists to confirm that proposed HCV locations and attributes have been accurately identified. On public forests, a transparent and accessible public review of proposed HCV attributes and areas is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions and delineations.	NC		No HCVF process has taken place, see 9.1
<b>C9.3. The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.</b>	NC		<b>The audit team concludes that in the absence of a crosswalk that demonstrates conformance the MTHNF operations cannot be found in conformance with this Criterion. Major CAR 2006.4</b>
9.3.a. Where the identification of HCVF attributes and areas is incomplete at the time of certification, forest owners or managers identify HCVF attributes and areas, develop a plan to maintain and/or enhance them, and begin implementation of the plan within one year of certification.	NC		No HCVF process has taken place, see 9.1
9.3.b. Stands and forests designated as HCVFs, which have been entered for timber harvest, are managed over the long term to assure that both the quality of their HCVF attributes and their area are maintained.	NC		No HCVF process has taken place, see 9.1
9.3.c. Forest owners and managers of HCVFs (forests and/or stands) coordinate conservation efforts with owners and managers of other	NC		No HCVF process has taken place, see 9.1

HCVFs within their landscape.			
<p><b>C9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</b></p> <p><i>Applicability note: Except where HCV attributes change rapidly or demonstrate ecological instability, annual monitoring may be informal and may be combined with other field activities. Attributes and locations that are highly vulnerable (e.g., small and/or unstable populations) and those that are intensively managed are monitored formally on an annual basis.</i></p>	NC		<p><b>The audit team concludes that in the absence of a crosswalk that demonstrates conformance the MTHNF operations cannot be found in conformance with this Criterion. Major CAR 2006.4</b></p>

## 1.1 Evaluation of Conformance with the Additional Considerations for National Forest Management

MTHNF was also evaluated against the National Forest Additional Considerations (see Section A, 2.0 for more details). The role of these Additional Considerations (“ACs”) was to simulate the type of supplemental indicators that may be developed under the direction of FSC-US for use in National Forests, *if* certification of federal lands were ever to become a real possibility. Since these ACs were not part of the duly approved standard, the Forest Service’s conformance to them was not considered when determining the overall conformance to the Standard. Similarly, CARs were not developed for ACs for which the audit team reached a finding of non-conformance.

Note: “C” = conformance

“NC” = non-conformance

<p>AC 1.1.1. By policy and action, managers of National Forests demonstrate a pattern of compliance with applicable federal laws and administrative requirements (e.g. NEPA, ESA, Clean Water Act, NFMA, MUSYA, The Wilderness Act, Wild and Scenic Rivers Act, Organic Act, CFR, Title 7, applicable sections of the US Code, the Forest Service Manual, and Forest Service Handbooks).</p>	C	<ul style="list-style-type: none"> <li>• Same as for Indicator 1.1.a</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>
<p>AC 1.5.1. National Forest managers assure that motorized recreational access opportunities and use patterns do not lead to significant adverse environmental impacts. A variety of approaches are used to manage and limit both authorized and unauthorized ATV/OHV activity and related damage. (Note: Examples of such approaches include:</p> <ul style="list-style-type: none"> <li>• Deploying law enforcement resources at a scale that is commensurate with the scale and intensity of motorized recreation use activity occurring on the Forest;</li> <li>• Establishing and enforcing penalties for unauthorized use sufficient to act as effective deterrents;</li> <li>• Ensuring that users are clear about closures through improved signage and other information sharing means;</li> <li>• Engaging in active and focused outreach/communications with user groups;</li> <li>• Fostering collaborative efforts with ATV/OHV clubs that promote ecologically and socially responsible use of recreational vehicles.)</li> </ul>	NC	<ul style="list-style-type: none"> <li>• A travel management plan is being developed</li> <li>• The agency is aware of OHV related problems and has blocked major access points to off-limit areas</li> <li>• The agency is working with groups, but is challenged by disparate OHV groups.</li> <li>• Guard rails were put up alongside the road in the Ladee Flat area to prevent OHV access</li> <li>• Example from the North Fork Mill Creek area, where a motorcyclist had created his own trails &amp; distributed maps; the FS put up cameras, identified him and took appropriate actions</li> <li>• Cleaning up illegal dumping</li> </ul>	<ul style="list-style-type: none"> <li>• FS currently does not meet this AC—A CAR would need to be issued if this AC were in fact adopted by the FSC</li> <li>• OHV use is a growing problem which will worsen with increasing population pressures; Ladee Flat as an example</li> <li>• Educational efforts and law enforcement, though ongoing, are inadequate to address the current and increasing OHV destruction</li> <li>• Law enforcement budget inadequate to address scale and scope of OHV issues</li> <li>• FS no longer bothers posting signs, as they get shot up or torn down almost immediately by users</li> <li>• Lack of posting, whether by inaction or action of OHV users, creates an impossible enforcement problem given the level of damaging use.</li> <li>• The Forest Service suggests that OHV is limited relative to other recreational use, but impact appears disproportional.</li> <li>• As staff are stretched thin due to budget constraints, it will be harder to enforce regulation of unauthorized/illegal activities</li> <li>• Travel Management Plan not due to come out until 2009</li> </ul>
<p>AC 3.3.1. Solicitation of tribal collaboration is designed around culturally sensitive approaches that honor nation-to-nation relationships.</p>	C	<ul style="list-style-type: none"> <li>• Gary Larsen (MTHNF Forest Supervisor) is the Forest Service official emissary and Bobby Bruno for CTWS; government to government relationship is recognized and embraced</li> </ul>	<ul style="list-style-type: none"> <li>○ While interaction with the Confederated Tribes of Warm Springs is generally exemplary, there remain occasional written notification and invitations for tribal notification and participation that may not be</li> </ul>

		<ul style="list-style-type: none"> <li>• The Mt. Hood actively works with the Confederated Tribes of Warm Springs, and employees down the line are sensitive and aware of tribal issues</li> <li>• Reflective of a successful relationship, Forest Service staff are invited to and attend annual “Harmony Sessions” to foster understanding of CTWS culture</li> <li>• There are a number of MOUs between the Tribes and MTHNF</li> </ul>	as culturally inviting as face-to-face communication.
AC 3.3.2. Affirmative methods of tribal outreach in accordance with cultural protocols (e.g., in-person meetings, order of contact) are attempted in order to generate substantive tribal response.	C	<ul style="list-style-type: none"> <li>• Quarterly meetings are held between CTWS and MTHNF representatives</li> <li>• Harmony Sessions are an example of the FS commitment to learn about and interact with CTWS</li> </ul>	•
AC 4.1.1. Non-local and migrant worker conditions (including transit to and from work sites) are actively monitored by both contractors and Forest Service personnel.	C	<ul style="list-style-type: none"> <li>• There are policies in place for equality of local and non-local workers, but only cursory monitoring of the working conditions</li> <li>• There is a national directive coming from the FS Chief’s office in Washington regarding non-local workers</li> </ul>	<ul style="list-style-type: none"> <li>• Marginal conformance would lead to a recommendation: more in-depth monitoring and more Spanish language speakers needed</li> <li>• Closer monitoring of field work and laborer conditions</li> </ul>
AC 4.4.1. Where they exist, forest managers participate in and contribute to local community fire protection planning and organizations, such as Fire Safe Councils.	C	<ul style="list-style-type: none"> <li>• Each county has a Community Wildfire Protection Plan (CWPP) that the Forest Service participates in.</li> <li>• The agency has participated directed and in some instances helped foster the development of community wildfire protection plans</li> <li>• The agency is not only a participant in groups, it catalyzes CWPP and other joint venture/partnership work</li> </ul>	•
AC 4.4.2. Forest managers develop and implement guidelines for appropriate public involvement that incorporate best practices for stakeholder consultation. The guidelines are distinct from legal timelines for soliciting public comments.	C	<ul style="list-style-type: none"> <li>• The MTHNF is very proactive in involving the public &amp; stakeholder consultation and has published material about its commitment to and work on stakeholder involvement and consultation processes</li> <li>• Mt. Hood Stewardship Partnerships</li> </ul>	•
AC 4.5.1. Managers of National Forests establish a policy and mechanism for informally resolving disputes and make it readily available to the general public.	C	<ul style="list-style-type: none"> <li>• The appeals reform act provides for multiple levels of formal and informal dispute resolution</li> <li>• On Forest Service web pages, there is a link for making contact if there are any concerns or disputes</li> </ul>	•
AC 5.2.1. Forest Service personnel utilize available contracting authorities (e.g., Stewardship and Best-Value contracts) in affording preference for local, financially competitive service providers, value-added processing and manufacturing facilities.	C	<ul style="list-style-type: none"> <li>• Best-Value contracts and Stewardship contracts are both utilized, which leads to use of local and financially competitive service providers</li> <li>•</li> </ul>	•
AC 6.1.1. Managers of National Forests use the best available science and information to prepare, at the scale of watersheds or larger, a written description of the historic range of variability of forest conditions and disturbance regimes, including: <ul style="list-style-type: none"> <li>• Description of the intensity, distribution, frequency, size, resulting landscape patterns, and residual stand structures of the major disturbance regimes.</li> <li>• Description of the historic range of variability of estimated composition of forest cover types, typical age class</li> </ul>	C	<ul style="list-style-type: none"> <li>• Fire condition class mapping has been completed for the region.</li> <li>• Watershed analyses and Late-Successional Reserve Assessments (all except Surveyor’s Ridge) do include descriptions of HRV</li> <li>• In recent years, there have been many peer-reviewed publications on this topic by Forest Service scientists</li> <li>• Each Watershed Analysis attempts to quantify how many acres are in a particular stage, and to compare that</li> </ul>	<ul style="list-style-type: none"> <li>• REC/OFI: Comparison of HRV to current conditions is not done in a uniformly high quality manner in each of the watershed analyses</li> </ul>

<p>distribution, and estimated stand structures;</p> <ul style="list-style-type: none"> <li>• Estimates of average fire return intervals for low, medium, and high (stand replacing) intensity fires.</li> </ul>		<p>amount to historical values</p> <ul style="list-style-type: none"> <li>• HRVs are compared to current conditions in a qualitative manner</li> </ul>	
<p>AC 6.1.2. The description of the historic range of variability of forest conditions is afforded external expert review as well as general public review. Comments received during such reviews are addressed in the final draft of the description of the historic range of variability.</p>	NC	<p>Is an external review of HRV done? As part of the Watershed Analysis review?</p>	<ul style="list-style-type: none"> <li>• Possible Minor CAR: Analysis of HRV is not peer reviewed</li> </ul>
<p>AC 6.1.3. Current forest conditions are compared, at appropriate scales, with the historic range of variability of forest conditions. Measures of current forest condition include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Area, composition (e.g., species and age class distribution), patch size and spatial representation of ecological types including old growth and late seral forests;</li> <li>• Composition and distribution of snags, den trees, mast trees, coarse woody debris and other habitat-related structural elements.</li> </ul>	C	<ul style="list-style-type: none"> <li>• Fires class condition mapping compares historic ranges to current conditions</li> <li>• This comparison has occurred for Late Successional Reserve planning as well as for Watershed Analyses.</li> <li>• Examples: White River LSR Assessment, East &amp; Middle Fork Hood River Watershed Analysis.</li> <li>• There are 25 different conditions referenced for forest types on the MTHNF</li> </ul>	
<p>AC 6.1.4. National Forest managers include considerations of the effects (both direct and cumulative) of management activities on neighboring lands as part of the scope of environmental impact assessments.</p>	C	<ul style="list-style-type: none"> <li>• MTHNF is quite cognizant of the implications of management activities on the border shared with the Confederated Tribes of Warm Springs.</li> <li>• For one Watershed Analysis, only 15% was in MTHNF but impacts on neighboring lands were still assessed.</li> <li>• The surrounding counties each have done fire hazard assessments that tie into MTHNF forest management</li> <li>• Watershed collaboratives such as that for the Clackamas River are examples of where neighboring lands are considered in management actions.</li> </ul>	
<p>AC 6.2.1. A comprehensive list of the species of interest and species of concern (e.g., species with notable conservation need) is maintained for each National Forest. Managers demonstrate through policies and actions that said species are duly considered in the course of forest management.</p>	C	<ul style="list-style-type: none"> <li>• There is a Regional Forester's list of sensitive species that covers those on the MTHNF</li> </ul>	
<p>AC 6.3.1. On National Forests, a desired future condition is defined and measurable targets are established for restoring forest composition and structure that are under-represented relative to the historic range of variability (as per analysis from AC 6.1.1-6.1.3). Targets are established with consideration of existing social, environmental and economic factors; management policies and actions demonstrate progress in achieving these targets and do not retard the natural rate of recovery of ecosystems.</p>	C	<ul style="list-style-type: none"> <li>• The Forest Service has clearly defined Desired Future Conditions for the MTHNF based on the Historic Range of Variability.</li> <li>• Example: Under the 1990 MTHNF Forest Plan, there are specific target acreages for deer &amp; elk forage habitat</li> </ul>	<ul style="list-style-type: none"> <li>• There needs to be more attention paid to ensuring adequate amounts of early successional habitat across the landscape (but not at the expense of late-successional habitat)</li> <li>• Funding is deficient, and limits MTHNF's ability to make progress towards these goals</li> </ul>
<p>AC 6.3.2. Connectivity between important wildlife habitats and key landscape features (such as HCVEFs) is retained while implementing even-aged timber management on National Forests.</p>	C	<ul style="list-style-type: none"> <li>• The spatial scale as well as intensity of even-aged management across MTHNF is so small that this is not a problem (e.g. 15% retention in stands limited to</li> </ul>	<ul style="list-style-type: none"> <li>•</li> </ul>

		60 acre maximum cuts)	
AC 6.3.3 In the absence of overriding ecological considerations, even-aged rotations (for planned “green sales”) on National Forests are at least as long as the culmination of mean annual increment, measured in board feet at the stand level.	C	<ul style="list-style-type: none"> <li>Although the MTHNF Forest Plan states that stands must have reached 95% of CMAI before a regeneration harvest, the audit team feels that +/- 5% is still within the flat portion of the MAI curve.</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>
AC 6.5.1. Forest managers, as part of their transportation system planning effort, complete a review of all legacy roads in the National Forest and develop a management strategy to plan for continued use, necessary upgrades for continued use, or abandonment. This review prioritizes the schedule of road management activities in order to minimize the impact of the overall road system.	NC	<ul style="list-style-type: none"> <li>The FS has only completed elementary planning for this issue.</li> </ul>	<ul style="list-style-type: none"> <li>Every NF has been mandated to complete a Transportation Management Plan – MTHNF has does not have the resources to move faster on the project.</li> <li>A Minor CAR would likely be stipulated: MTHNF should go through NEPA to prioritize which roads to close/reclassify. See also 6.5.g and 6.5.l.</li> </ul>
AC 6.5.2. Forest management practices, such as management of cattle grazing, maintain or restore aquatic ecosystems and habitat features, wetlands, and forested riparian areas (including springs, seeps, fens, and vernal pools).	C	<ul style="list-style-type: none"> <li>MTHNF management practices, as guided by the Northwest Forest Plan, exercise the precautionary principle and do maintain aquatic ecosystems and habitats.</li> </ul>	<ul style="list-style-type: none"> <li></li> </ul>
AC 6.9.1. Managers of National Forests identify high risk activities by which invasive exotic plants become established in and/or spread through the Forest. Control mechanisms are implemented for high risk activities associated with Forest Service management responsibilities.	C	<ul style="list-style-type: none"> <li>Operators are required to wash all harvesting equipment before leaving the work site</li> <li>Recreational vehicles have been recognized as a vector and a program is in place to educate users regarding invasives.</li> <li></li> </ul>	<ul style="list-style-type: none"> <li>Control mechanisms exist but not completely implemented or thoroughly implemented, perhaps due to lack of funding</li> </ul>
AC 9.1.1. National Forest managers use either the FSC HCVF Tool Kit, Canadian National Framework for HCVF, or develop their own comparable approach for identifying HCVF. The adapted mechanism/methodological approach is made available for external expert review and broad stakeholder comment.	NC		No HCVF process has taken place, see 9.1
AC 9.1.2. By policy and action, managers of National Forests demonstrate compliance with Section 2(c) of the Wilderness Act and the Wild and Scenic Rivers Act in the course of identifying and designating HCVF.	NC		No HCVF process has taken place, see 9.1

## 1.2 Controversial Issues

Based on findings from the pilot evaluation of the Mt. Hood National Forest, as well as through stakeholder interactions, the audit team has determined that the following topics merit consideration as “controversial issues”:

- FSC Certification of National Forests in the United States
- Commercial timber harvesting on MTHNF, particularly in old growth stands
- Salvage logging after fire events
- OHV management

## **2.0 TRACKING, TRACING AND IDENTIFICATION OF FOREST PRODUCTS**

This section of the report addresses the procedures employed by the forest managers to track the flow of wood products from the point of harvest through to the point where custody is assumed by another entity (i.e., the wood products purchaser). The fundamental requirement that must be demonstrated by the forest management operation is that product from the certified forest area not be mixed with product from non-certified sources. This requirement is attained by compliance with the FSC Criteria for chain of custody. It is against these Criteria that SCS evaluates applicant forest managers for potential award of chain of custody certification.

Given the nature of this pilot test, the chain-of-custody of certified material was not evaluated. Currently, certification of National Forests is prohibited by FSC policy, so evaluating MTHNF on their use of the FSC logo would be highly premature. If, hypothetically, MTHNF ever were to become certified, a documented control system would be needed in order to ensure that uncertified wood products are not sold as certified. The partial estate nature of such a certification (i.e., MTHNF being a subset of the National Forest System) could be a potential stumbling block in creating such a system.

## Appendix 1 List of Federal Statutes Related to Forest Service Activities

- 05-10-1872: U.S. Mining Laws
- 08-01-1888: Right of Eminent Domain
- 06-06-1897: Organic Administration Act
- 02-28-1899: Mineral Springs Leasing
- 03-03-1899: Public Land Surveys
- 02-01-1905: Transfer Act
- 06-08-1906: Preservation of American Antiquities
- 03-04-1907: Disposition of Receipts from National Forest Revenues
- 05-23-1908: Twenty-Five Percent Fund
- 06-25-1910: Indian Allotments
- 03-01-1911: Weeks Law
- 03-04-1913: Expenditures from Receipts
- 06-30-1914: Cooperative Funds
- 03-04-1915: Occupancy Permits
- 08-11-1916: Deposits from Brush Disposal
- 08-11-1916: Wildlife Game Refuges
- 03-04-1917: Mineral Resources on Weeks Law Lands
- 07-03-1918: Migratory Bird Treaty Act of 1918
- 02-25-1920: Mineral Leasing Act
- 06-05-1920: Federal Power Act
- 03-20-1922: General Exchange Act
- 06-07-1924: Clarke-McNary Act
- 01-31-1925: Affidavits, Affirmations and Oaths
- 03-03-1925: Facilitate and Simplify Work of Forest Service and to Promote Reforestation
- 04-12-1926: Timber Exportation
- 05-15-1926: Limitation of National Forest Designation
- 12-22-1928: Color of Title
- 02-18-1929: Migratory Bird Conservation Act
- 04-28-1930: Title Adjustment
- 05-27-1930: Damage to Private Property (Search and Rescue)
- 06-09-1930: Knutson-Vandenberg Act
- 02-26-1930: Land Acquisition - Declaration of Taking
- 03-03-1931: Davis-Bacon Act
- 06-30-1932: Contracts Prior to Appropriations
- 03-03-1933: Buy American Act
- 03-10-1934: Fish and Wildlife Coordination act
- 06-04-1936: Funding Employment and Equipment
- 06-30-1936: Walsh-Healey Act
- 07-22-1937: Bankhead-Jones Farm Tenant Act
- 02-26-1938: Sale of Photographic Reproductions and Maps
- 02-16-1938: Federal Crop Insurance - Title V
- 05-28-1940: Domestic Water Supply
- 06-08-1940: Bald and Golden Eagle Protection Act

- 06-15-1940: Deposit of Sale Instruments in Treasury
- 07-08-1943: Land Acquisition - Title Adjustment
- 03-29-1944: Sustained Yield Forest Management
- 09-21-1944: Department of Agriculture Organic Act of 1944
  - Title II - Authorizing Rewards
  - Title VII - Uses of Appropriated Funds
- 12-22-1944: Federal-State Cooperation for Soil Conservation
- 06-25-1947: Federal Insecticide, Fungicide, and Rodenticide Act
- 07-31-1947: Minerals Act of 1947
- 08-07-1947: Mineral Leasing Act for Acquired Lands
- 06-25-1948: U.S. Criminal Code ("Title 18, U.S.C. Chapter 91-Public Lands")
- 06-25-1948: Tort Claims Procedure ("Title 28, U.S.C.")
- 06-30-1948: Clean Water Act (Federal Water Pollution Control Act)
  - Title I - Research and Related Programs
- 06-21-1949: Mining Assessment Work
- 06-30-1949: Federal Property and Administrative Services Act of 1949
  - Title VIII - Urban Land Utilization
  - Title IX - Selection of Architects and Engineers
- 10-11-1949: Anderson-Mansfield Reforestation and Revegetation Joint Resolution
- 04-24-1950: Granger-Thye Act
- 09-06-1950: General Appropriation Act, 1951
  - Chapter XII - General Provisions (Expenditure Limitations)
- 05-23-1952: Smokey Bear Act
- 07-30-1953: Small Business Act
- 08-04-1954: Watershed Protection and Flood Prevention Act
- 09-03-1954: Permits for Public Buildings and Other Public Works
- 07-14-1955: Clean Air Act
- 07-23-1955: Multiple Use Mining Act of 1955
- 08-11-1955: Mining Claims Rights Restoration Act of 1955
- 07-26-1956: Interchange with Department of Defense
- 08-03-1956: Department of Agriculture Organic Act of 1956
- 08-08-1956: Fish and Wildlife Act of 1956
- 06-20-1958: Forest Service Omnibus Act of 1958
- 07-31-1958: Townsite Act
- 08-27-1958: Forest Highways
- 09-02-1958: Weeks Act Status for Certain Lands
- 09-08-1959: Wild Horse Protection
- 06-11-1960: Functions Transfer (Interior to Agriculture)
- 06-12-1960: Multiple Use-Sustained Yield Act 1960
- 09-15-1960: Sikes Act (Fish and Wildlife Conservation)
- 03-03-1962: Leases Around Reservoirs
- 08-13-1962: Contract Work Hours and Safety Standards Act
- 09-05-1962: Joint Surveys of Watershed Areas
- 09-28-1962: Petrified Wood (Exclusion from Deposits)
- 10-10-1962: McIntire-Stennis Act
- 10-23-1962: Mining Claim Occupancy Act

- 10-23-1962: Forest Service Omnibus Act of 1962
- 09-03-1964: Wilderness Act
- 09-03-1964: Land and Water Conservation Fund Act of 1965
- 10-13-1964: National Forest Roads and Trails Act
- 07-09-1965: Federal Water Project Recreation Act
- 07-22-1965: Water Resources Planning Act
  - Title I - Water Resources Council
  - Title II - River Basin Commission
- 10-20-1965: Solid Waste Disposal Act
- 10-22-1965: Service Contract Act of 1965
- 06-24-1966: Public Lands, Grants to States
- 07-18-1966: Statutes of Limitations for Certain Actions Brought by the Government
- 09-06-1966: Government Organization and Employees
  - Chapter 5 - Subchapter H, Administrative Procedures
  - Chapter 57 - Subchapter I, Travel and Subsistence Expenses; Mileage Allowances
- 09-09-1966: Highway Safety Act
- 10-15-1966: National Historic Preservation Act
- 12-04-1967: Sisk Act (Land Exchanges with Local Governments)
- 08-12-1968: Architectural Barriers Act of 1968
- 10-02-1968: Wild and Scenic Rivers Act
- 10-02-1968: National Trails System Act
- 10-16-1968: Intergovernmental Cooperation Act of 1968
- 10-17-1968: Carlson-Foley Act (Control of Noxious Plants)
- 01-01-1970: National Environmental Policy Act
- 04-03-1970: Environmental Quality Act of 1970
- 08-13-1970: Youth Conservation Corps
- 12-24-1970: Geothermal Steam Act of 1970
- 12-29-1970: Occupational Safety and Health Act of 1970
- 12-31-1970: Mining and Minerals Policy Act of 1970
- 01-02-1971: Uniform Relocation Assistance and Land Acquisitions Policies Act of 1970
- 01-05-1971: Intergovernmental Personnel Act of 1970
- 08-10-1971: Cooperative Law Enforcement (Authority for)
- 12-15-1971: Wild Horses and Burros Protection Act
- 05-18-1972: Volunteers in the National Forests Act of 1972
- 08-30-1972: Rural Development Act of 1972
- 09-18-1972: Supplemental National Forest Reforestation Fund
- 10-06-1972: Federal Advisory Committee Act of 1972
- 10-25-1972: Real Property Quiet Title Actions
- 08-10-1973: Agriculture and Consumer Protection Act of 1973
- 09-26-1973: Rehabilitation Act of 1973 (Title V)
- 12-28-1973: Endangered Species Act of 1973
- 05-22-1974: Disaster Relief Act of 1974
- 05-24-1974: Preservation of Historical and Archeological Data
- 06-22-1974: Woodsy Owl-Smokey Bear Act
- 08-17-1974: Forest and Rangeland Renewable Resources Planning Act of 1974
- 08-30-1974: Federal Procurement Policy Act

- 11-21-1974: Freedom of Information Act
- 12-31-1974: Privacy Act of 1974
- 01-03-1975: Eastern Wilderness Act
- 01-03-1975: Federal Noxious Weed Act of 1974
- 12-12-1975: Cooperative Funds and Deposits
- 12-22-1975: Energy Policy & Conservation Act
- 09-13-1976: Government in the Sunshine Act
- 10-11-1976: Toxic Substances Control Act
- 10-20-1976: Payments in Lieu of Taxes Act
- 10-21-1976: Federal Land Policy and Management Act of 1976
- 10-22-1976 National Forest Management Act of 1976
- 08-03-1977: Surface Mining Control and Reclamation Act of 1977
- 09-29-1977: Food and Agriculture Act of 1977
  - Title XIV - National Agricultural Research, Extension and Teaching Policy Act of 1977
  - Title XVIII - Department of Agriculture Advisory Committees
- 11-16-1977: Safe Drinking Water Amendments of 1977
- 11-18-1977: Soil and Water Resources Conservation Act of 1977
- 06-30-1978: Renewable Resources Extension Act of 1978
- 06-30-1978: Forest and Rangeland Renewable Resources Research Act of 1978
- 07-01-1978: Cooperative Forestry Assistance Act of 1978
- 08-04-1978: Emergency Flood Prevention (Agricultural Credit Act of 1978)
- 08-11-1978: American Indian Religious Freedom
- 10-10-1978: Secretary of Agriculture-Jurisdiction of Lands
- 10-10-1978: Acceptance of Gifts
- 10-25-1978: Public Rangelands Improvement Act of 1978
- 11-01-1978: Contract Disputes Act of 1978
- 11-09-1978: Public Utility Regulatory Policies Act of 1978
- 10-31-1979: Archaeological Resources Protection Act of 1979
- 06-30-1980: Energy Security Act
- 09-26-1980: National Aquaculture Act of 1980
- 09-29-1980: Fish and Wildlife Conservation Act of 1980
- 10-14-1980: Recreational Boating Safety and Facilities Improvement Act of 1980
  - Title III - Reforestation Tax Incentives and Trust Fund
- 10-14-1980: Fifth Circuit Court of Appeals Reorganization Act of 1980
- 10-21-1980: Stevenson-Wydler Technology Innovation Act of 1980
- 12-02-1980: Alaska National Interest Lands Conservation Act
- 12-11-1980: Comprehensive Environmental Response Compensation and Liability Act of 1980
- 12-12-1980: RPA Statement of Policy of 1980 (Interior Department and Related Agencies, Appropriations for FY 1981)
- 12-17-1980: Donation of Real Property to U.S.
- 12-19-1980: Wood Residue Utilization Act of 1980
- 12-22-1980: Salmon and Steelhead Conservation and Enhancement Act
- 11-16-1981: Lacey Act Amendments of 1981
- 12-22-1981: Agriculture and Food Act of 1981
  - Title XV - Resource Conservation
- 09-13-1982: Money and Finance

- Chapter 13 - Subchapter III, Limitations, Exceptions, and Penalties
- Chapter 15 - Subchapter II,
- Chapter 37 - Subchapter II, Claims of the United States Government
- Chapter 63 - Using Procurement Contracts and Grants and Cooperative Agreements
- Chapter 65 - Intergovernmental Cooperation
- Chapter 69 - Payment for Entitlement Land
- 06-12-1983: Prompt Payment Act
- 01-12-1983: Small Tracts Act
- 10-16-1984: Federal Timber Contract Payment Modification Act
- 12-23-1985: 1985 Farm Bill
  - Title XII - Conservation Reserve Program
- 10-22-1986: National Forest Ski Area Permit Act of 1986
- 10-27-1986: National Forest System Drug Control Act of 1986
- 08-20-1988: Federal Land Exchange Facilitation Act of 1988
- 09-09-1988: Temporary Emergency Wildfire Suppression Act
- 10-04-1988: Rails to Trail
- 10-24-1988: Forest Ecosystems and Atmospheric Pollution Research Act of 1988
- 10-24-1988: Firefighter Pay Cap
- 11-05-1988: Federal Energy Management Improvement Act of 1988
- 11-18-1988: Anti-Drug Abuse Act of 1988
- 11-18-1988: Federal Cave Resources Protection Act of 1988
- 11-18-1988: Federal Employees Liability Reform and Tort Compensation Act of 1988
- 12-13-1989: North American Wetlands Conservation Act
- 07-26-1990: Americans with Disabilities Act
- 08-20-1990: Customs and Trade Act of 1990
  - Title IV - Forest Resource Conservation and Shortage Relief Act of 1990 (Log Export Restrictions)
- 11-05-1990: Foreign Operations Appropriations Act
  - Title VI - International Forestry Cooperation Act of 1990
  - 11-16-1990: National Forest Foundation Act (Title IV)
- 11-16-1990: Native American Graves Protection and Repatriation
- 11-16-1990: National Environmental Education Act
- 11-28-1990: National 1990 Farm Bill
  - Title XII - Forest Stewardship Act of 1990
    - Subtitle A - Cooperative Forestry Assistance Act
    - Subtitle B - Research and Education
    - Subtitle C - America The Beautiful
    - Subtitle D - Miscellaneous Provisions
  - Title XV - Agricultural Development and Trade Act of 1990 (Rural Communities Revitalization)
  - Title XXIV - Global Climate Change Prevention Act of 1990
- 11-28-1990: Take Pride in America Program (Title XI)
- 11-28-1990: National Indian Forest Resources Management Act (Title III)
- 11-29-1990: Federal Debt Collection Procedures Act
- 12-18-1991: ISTEA (Intermodal Surface Transportation Efficiency Act of 1991)
  - Title I - Part A - Scenic Byways Program
  - Title I - Part B - Symms National Recreational

- 01-03-1992: Pacific Yew Act
- 09-30-1992: Tourism Policy and Export Promotion Act of 1992
- 10-05-1992: Appeals Reform act - Sec 322 Forest Service Decision-making And Appeals Reform
- 01-07-2003: Healthy Forests Restoration Act of 2003

## Appendix 2 List of Forest Service Personnel Participating in the Evaluation Process

<b>Name</b>	<b>Title</b>
Nancy Lankford	Forest Silviculturist/Project Manager
Gary Larsen	Forest Supervisor
Rick McClure	Forest Archaeologist/Heritage Program Manager
Doug MacCleery	Senior Policy Analyst, FS Washington Office
Jennie O'Connor	Natural Resource Planner
Christine Arredondo	Recreation/Lands, Planning Staff Officer
Jeff Jaqua	Zigzag District Archaeologist
Jim Wrightson	Forest Fire Planner
Deb Roy	Acting Fire Staff
KJ Silverman	Deputy Forest Supervisor
Jim Rice	Forest Products Program Manager
Malcolm Hamilton	Recreation Program Manager
Jim Tierney	Engineering Zone Manager – Roads
Daina Bambe	Hood River District Ranger, acting ZZ Ranger
Mike Redmond	Environmental Coordinator
Andrei Rykoff	Clackamas River District Ranger
Jim Roden	Timber Sale Planner, Clackamas RD
Robert Bergamini	Fisheries Biologist, Clackamas RD
Glenda Goodwyne	District Silviculturist, Clackamas RD
Gwen Collier	District Soil Scientist, Clackamas RD
Sharon Hernandez	District Wildlife Biologist, Clackamas RD
Burnham Chamberlain	Silvicultural Technician, Clackamas RD
John Dodd	Soil Scientist, Barlow/Hood River RDs
Roy Shelby	FSR/Sale administrator
Ray Weiss	FMO Eastside
Rich Thurman	Wildlife Biologist, Hood River RD
Darcy Morgan	Fisheries Biologist, Hood River RD
Kevin Slagle	Recreation/Special Uses, Hood River RD
Cheryl Sonnabend	SFP Manager, Barlow/Hood River RDs
Chris Rossel	Fisheries Biologist, Barlow RD
Michael Dryden	Archaeologist, Barlow/Hood River RDs
Scott MacDonald	Assistant Fire Management Officer, Barlow RD
Erin Black	Eastside NEPA Planner
Peggy Kain	Regional Office NR
Dan Fissell	Range & Weeds, Barlow RD
Larry Rector	Reforestation/TSI
Mark Kreiter	Hydrologist
Kim Smolt	Eastside Silviculturist
Ivars Steinblum	Forest Hydrologist
Dan Shively	Fisheries Program Manager
Jeanne Rice	Forest Ecologist
Lisa Norris	Forest Natural Resources Staff Officer

### **Appendix 3 List of Stakeholders**

#### ***Stakeholders Interviewed***

Doug Jones, Hood River Ranger District  
Jeff Gerwig, Forest Ecologist and Clackamas County Stewardship Partners  
Chuck Burley, AFRC  
Cal Mukumoto, Confederated Tribes of Warm Springs  
Bud Kahn, Thousand Trails Management  
Jose Perez, Perez Reforestation  
Frank Backus, SDS Lumber  
Rex Storm, Associated Oregon Loggers  
Barbara Wilson, Friends of Mt Hood  
Alex brown, BARK  
Ivan Maluski, Sierra Club  
Susan Jane Brown, Lewis and Clark Law, Pacific Environmental Advocacy Center  
Christine Caurant, Oregon Natural Resources Council

#### ***Stakeholder Contacted, but not Interviewed***

Hal Salwasser, Dean of Forestry, Oregon State University  
Bobby Bruno, Confederated Tribes of Warm Springs  
Jim Crocker, Confederated Tribes of Warm Springs  
Jodi Kaleeka, Confederated Tribes of Warm Springs  
Richard Dodge, Dodge Logging  
Jennifer Clark, Wasco County Soil and Water Conservation  
Ken Hanson, Backcountry Horsemen  
Bob Freimark, The Wilderness Society  
Jurgen Hess, Columbia Gorge Institute  
Michael Tehan, Director, National Marine Fisheries Service  
Bob Progulske, Forest Resources, US Fish and Wildlife Service  
Ann Saxby, Hood River Watershed Council  
Roy Hillmick, Lost Lake Resort  
Cass Moseley, Researcher, University of Oregon  
Ginny Van Loo, Clackamas Board of Commissioners  
Larry Sowa, Clackamas County Commissioner  
Carol York, Hood River County Commissioner  
Ralph Blumers, CRAG  
Mary Swanson, Clackamas County Parks Department  
Emily Platt, Gifford Pinchot Task Force  
Rowanneh, Immigrant and Refugee Community  
Scott McKay  
Wasco County Commissioners  
Joe, Backcountry Horsemen of Oregon  
Les Mead, City of Dufur  
Fifteenmile Watershed Council

Frank Gearheart, Citizens Interested in Bull Run  
Michael Carlson, Clackamas River Basin Council

**Appendix 4 MTHNF Preliminary Evaluation Report**



**A Pilot Test Preliminary Assessment of the Management of the:**

**Mt. Hood National Forest  
As managed by the  
USDA Forest Service**

**Relative to the Standards of Third-Party Certification under the  
Forest Stewardship Council**

**Date of Field Evaluation: August 22-23, 2006**

**Date of Draft Report: September 10, 2006**

**Date of Final Report: September 18, 2006**

**By:**

**SCIENTIFIC CERTIFICATION SYSTEMS  
2000 Powell St. Suite Number 1350  
Emeryville, CA 94608, USA**

**SCS Contact: Dr. Robert J. Hrubes**

## INTRODUCTION

The Pinchot Institute for Conservation (PIC), acting in collaboration with the USDA Forest Service (FS) retained Scientific Certification Systems to provide detailed information about the feasibility and costs of achieving third-party certification of the management of the Mt. Hood National Forest, located approximately 50 miles east of Portland, Oregon. Certification of forest management programs by independent, third parties has become increasingly common world-wide for a variety of reasons. Of note, numerous state forestry agencies have sought independent, third-party certification of state forestlands under their management over the past several years. Certification provides assurance to customers, managers, landowners, and the general public that objective standards are being met in the management of forests. Certification also helps land managers understand how their programs and practices compare with other organizations and helps these managers improve their forestry and conservation practices.

To further its understanding of certification, PIC/FS issued a request for proposals for the execution of dual feasibility studies (also referred to as scoping assessments or preliminary evaluations) of the Mt. Hood National Forest relative to the Principles & Criteria of the Forest Stewardship Council (FSC) and the 2005-2009 standard of the Sustainable Forestry Initiative® (SFI) certification programs.

Scientific Certification Systems (SCS) of Emeryville, California and NSF International Strategic Registrations (NSF) of Ann Arbor, Michigan joined to prepare and submit a joint proposal in response to the Pinchot Institute's request for proposals. PIC awarded a contract, and the two firms began work in August, 2006. This report summarizes the findings of the FSC portion of this joint FSC – SFI Gap Analysis and Readiness Review, otherwise known as a Preliminary Evaluation or Scoping Visit.

### **The Forest Service Pilot Test Program**

The assessment and results presented in this report are part of a broader certification pilot project being undertaken by the USDA Forest Service. Five National Forest units have undergone or will undergo a simulated dual (FSC/SFI) certification evaluation process (scoping visits followed by full evaluations) for the purpose of generating experiential information with which the Forest Service can determine if it wishes to, in fact, seek third-party certification for some or all of the National Forest units it manages. In order to provide the greatest amount of directly relevant strategic information from these pilot tests, they are structured so as to be “full simulations” of the full protocols of both the FSC and SFI programs. As such, the pilot test for Mt. Hood National Forest includes the following steps:

- Selection of and signing a contract with an entity(ies) duly accredited to conduct audits against the FSC and SFI standards
- Scoping Visit
  - Pre-field document collation and review
  - Public notice and solicitation of comment (FSC, only)
  - On site visit including field reconnaissance and staff interviews
  - Stakeholder consultation (FSC, only)
  - Report preparation (separate for FSC and SFI)
- Development of special considerations/supplemental indicators through a transparent and participative process (FSC, only)
- Public notice and solicitation of comment, connected to the full evaluation (FSC, only)

- Full field evaluation, including stakeholder consultation
- Rendering of a certification decision on the basis of information gathered (simulated)
- Preparation of reports (separate for FSC and SFI)

For more information on the pilot test case studies, go to: [http://www.pinchot.org/certification/national\\_forest.htm](http://www.pinchot.org/certification/national_forest.htm).

To be clear, award of certification is not a possible outcome of these pilot projects.

To further underscore this key point, the following is a statement prepared by the Pinchot Institute:

“The findings contained in this report are the results of an independent evaluation of the management of a National Forest, which has been commissioned by the Pinchot Institute for Conservation (PIC). The findings are not determinations of conformance with Forest Stewardship Council (FSC) and Sustainable Forestry Initiative (SFI) requirements as would be reported for a landowner qualified to seek certification under either of these programs. The Forest Service and any other party may not: (a) use the names, logos, seals, certification marks or trademarks, or assessment systems or procedures, of the contracting firm(s) or the FSC and SFI certification programs for any purpose whatsoever, including, without limitation, the marketing, sale or promotion of any forest products; or (b), make any claim of conformity or near conformity with FSC and/or SFI requirements or any portion thereof, or any other operation, until and unless a certificate is awarded by an FSC and/or SFI accredited firm subject to a qualified FSC and/or SFI certification assessment.”

## **FORMAT USED TO ADDRESS ASSESSMENT ISSUES**

PIC/FS requested a joint FSC – SFI preliminary evaluation and selected the SCS/NSF-ISR team, which proposed to employ a single two-person audit team. The evaluation was conducted by:

- FSC Lead Auditor, Dr. Robert Hrubes, SCS
- SFI Lead Auditor, Mike Ferrucci, NSF-ISR

Resumes of the audit team members can be found in Appendix 1.

### **The preliminary evaluation/gap analysis consisted of the following phases:**

Phase I - Scheduling, Document Request and Planning

Phase II - Office Review and Field Assessment

Phase III - Report Preparation and Revisions

The purpose of a scoping visit/preliminary evaluation is to provide a forestland owner or manager with early and strategic insight as to their preparedness to achieve FSC or SFI endorsed certification, were a full evaluation to be carried out. As such, a preliminary evaluation constitutes a “gap analysis” with which forestland owners and managers are better able to identify aspects of their management program that may be deficient relative to the certification standard and, thus, could serve as obstacles to achieving certification, were a full evaluation to be undertaken.

## SCS BACKGROUND INFORMATION

Scientific Certification Systems (SCS) is an FSC-accredited auditing and certification company that has certified forest operations world wide, totaling over 14 million acres. In the U.S., SCS has worked with state forestry agencies in the following states:

- Wisconsin
- Michigan
- Washington
- Maine
- Pennsylvania
- Maryland

SCS has issued over 600 chain-of-custody certificates, also under the aegis of the FSC. These certificates are associated with over 35 countries, around the world. SCS has been a FSC-accredited certification body since 1995.

Preliminary evaluations are a standard first step in the FSC-endorsed certification process and are designed to afford insight to a forest management entity as to general areas of strength and weakness relative to the standards of certification. The results of a preliminary evaluation will enable forest managers and decision-makers to make more informed decisions as to the merits and potential costs or implications of seeking FSC-endorsed certification.

It is important for all interested parties to understand that a preliminary evaluation does not provide any guarantees as to the outcome of a full certification evaluation. Because of its preliminary and limited nature, this first step in the certification process is properly framed as an indication and expert judgement as to the likely outcome of a full evaluation, were one to be conducted. But both false positive and false negative preliminary judgements could arise during a preliminary evaluation, though SCS employs only its senior staff and experienced outside consultants to conduct preliminary evaluations so as to enhance the robustness of the process.

### Summary of Events

The field component of the scoping visit was conducted from August 21-23, 2006 and included the following activities:

#### Monday, August 21:

Hrubes (FSC lead auditor) and Ferrucci (SFI lead auditor) travel to Sandy, Oregon; final evaluation preparations that evening

#### Tuesday, August 22:

8 AM: Opening meeting at the Mt. Hood Supervisor's Office (SO) in Sandy, Oregon; group discussion with Forest Supervisor and a cross section of SO staff

- introductions
- overview of the pilot tests, FSC and SFI certification programs
- general overview of the Mt. Hood National Forest
- presentation by the Forest Supervisor

2 PM: Field visit to Zig Zag District

- Clear Fork flood restoration project (Duane Bishop)
- Trail head/discussion of recreation mgt. (Malcolm Hamilton)
- Tour of Zig Zag recreation residences

6 PM: Public stakeholder meeting

- held at the SO and attended by 7 individuals

7:30 PM: Evening discussion with members of the Forest Leadership Team and other staff

Wednesday, August 23

7 AM: Field Visit to Clackamas River Ranger District

- Recent commercial thinning in 35-45 year old planted stands (Jim Rice)
- Commercial thinning practices of 10 years ago
- Regeneration Harvest in O.G. (Alan Dyck)
- Discussion of NWFP harvesting and stream course guidelines

1:30 PM: Follow-up interviews with SO and Zone Personnel in Sandy

- Timber sale contracting (Tim Johnson)
- Service contracting./ migrant workers (Dave Hallen)
- Insects and disease (Bruce Hostetler)
- Fisheries program (Dan Shively)

4:00 PM: Audit planning for the main assessment, scheduled for September 17-22, 2006

5:00 PM: Closing meeting

- presentation of preliminary observations/impressions
- review of the remaining stages of the pilot project

## **Individuals Interviewed**

During the course of the office meetings and field inspections, the lead auditors had the opportunity to meet and talk with a good number and diversity of Forest Service employees attached to the Mt. Hood National Forest, from Forest Supervisor Gary L. Larsen down to field technicians. Interviews took place in both individual and group settings, both in offices and in the field. Additionally, the auditors held an open invitation public meeting on the evening of Day 1, held at the Supervisor's Office in Sandy.

### Forest Service Personnel Interviewed:

Gary L. Larsen, Forest Supervisor  
Lisa Kae Norris, Natural Resources Staff Officer  
Nancy Lankford, Forest Silviculturist  
Jenny O'Conner, Forest Planner  
Jeanne Rice, Forest Ecologist  
Mike Redmond, Forest Environmental Coordinator  
Alan Dyke, Wildlife Program Manager  
Malcolm Hamilton, Recreation Program Manager  
Duane Bishop, District Fisheries Biologist  
Ivers Steinblum, Forest Hyrdologist  
Christine Arredondo, Recreation Staff Officer  
Dave Hallen, Zone Contracting Officer-Procurement  
Tim Johnson, Zone Timber Sale Contracting Officer  
Bruce Hostetler, Entomologist, Westside Forest Insect & Disease Center  
Dan Shively, Forest Fisheries Program Manager

Dave Schultz, Incident

Jim Rice, Forest Products Program Manager

### Stakeholders Interviewed:

Larry Potts, Confederated Tribes of Warm Springs Tribal Enterprise  
Cal Mukumoto, Confederated Tribes of Warm Springs Tribal Enterprise  
Bob Freimark, The Wilderness Society  
Alex Brown, Bark  
Tamara Holcomb, USDA Forest Service (Washington Office-detached)  
Dave Butt, Government Camp Owners Association  
Petr Kakes, Hurricane Racing and Government Camp resident  
Russ Plager, Sandy River Watershed Council

## FORMAT OF FINDINGS

Under the umbrella of the FSC, forest management operations are evaluated against a set of standards known as the *FSC Principles and Criteria of Forest Stewardship*, which in this case are further elaborated by a duly endorsed regional standard, the *FSC Pacific Coast Regional Standard*. Like all National and Regional Standards, the FSC Pacific Coast Regional Standard provides regionally-specific elaborations and interpretations of the P&C, in the form of regional *Indicators* associated with each of the Criterion.

To follow are the SCS lead auditor's findings, presented in two formats:

- A general overview of strengths and gaps relative to each of the FSC Principles of Forest Stewardship.
- A summary of possible gaps/deficiencies relative to the regional indicators that elaborate upon the FSC Principles and Criteria.

The reader is reminded that preliminary evaluations (scoping visits), by their very nature, are not definitive determinations of the degree of conformance to the certification standard. Only a full certification evaluation, conducted under the auspices of the FSC and according to FSC protocols, will generate definitive determinations of conformance. In contrast, preliminary evaluations provide the audit team's professional judgments as to possible non-conformances, based upon limited exposure to the forest management operations. That is, the results of preliminary evaluations constitute findings as to the likelihood that the candidate forest management operation would be found in conformance to the standard, were a full evaluation to be conducted.

This cautionary note is all the more significant for the National Forest pilot test projects, such as the Mt. Hood National Forest pilot, because of the fact that the FSC-US has yet to develop and seek FSC International approval for the supplemental indicators for assessing management of national forests managed by the USDA Forest Service.

In instances where possible non-conformances or "gaps" are identified and discussed in this report, we recommend that the Mt. Hood National Forest management team pursue a combination of the following responses, between now and the time of the full evaluation, scheduled for late September, 2006:

- In the event that Mt. Hood personnel believe that an identified gap, in fact, does not exist despite the preliminary findings of the lead auditor, compile additional information and evidence to submit to the full evaluation team—on or before the conduct of the full evaluation--that better demonstrates how the Forest Service is conforming to the particular criterion or indicator
- Formulate, and implement as far as possible in the very limited time period between the scoping visit and the main assessment, corrective actions aimed at closing the identified gaps.

### **Development of Additional Considerations**

Per the terms of the Request for Proposal jointly issued by The Pinchot Institute for Conservation and the USDA Forest Service, this pilot test exercise is to include an additional procedural step—the identification and development, through a consultative process, of any "special considerations" that, due to the unique nature of national forest management, ought to be brought to bear in the assessment of, in this case, the Mt. Hood National Forest. Given this charge, SCS has developed a multi-staged procedure for developing these additional considerations that will be employed in the main assessment, in September 2006:

- Iteratively build upon the Additional Considerations developed for and previously employed during the pilot test audit of the Lakeview Federal Stewardship Unit, also located in Oregon
- Use the Mt. Hood scoping visit as a source of information about possible augments to or modifications of the Additional Considerations developed during the prior pilot test on the Lakeview Federal Stewardship Unit
- Conduct a second iteration of expert review of the draft Mt. Hood additional considerations
- Conduct a second iteration of solicitation of public/stakeholder web-based review and comment, this time focusing on the Mt. Hood draft additional considerations
- Finalize the additional considerations, for use in the September 2006 (simulated) full certification evaluation.

Due to this extra procedural stage of the overall process, the findings of the scoping visit are additionally provisional (i.e., subject to subsequent revision) due to the fact that these special considerations/supplemental indicators due not yet exist as, as such, have not yet been brought to bear in assessing the management of the Mt. Hood.

## FINDINGS

### General Overview

Based upon the information gathered and preliminary judgments formed from document reviews, personal interviews and field inspections conducted as part of the scoping visit, it is the SCS audit team's general sense that the Forest Service's management of the Mt. Hood National Forest is, overall, quite compatible with the general thrust and requirements of FSC certification, as detailed in the FSC Pacific Coast Regional Standard. Of significant note in this regard:

- Mt. Hood N.F. leadership recognizes the special implications of being an "urban forest" and its evolving management direction is responsive to this reality, as memorialized in the recently completed *Mt. Hood National Forest Strategic Stewardship Plan*
- The basic thrust of management activities is to restore the ecological health of the Mt. Hood with a special emphasis on restoring aquatic and riparian resources; timber management, particularly as now being pursued, is conducted within this context
- Forest managers place a high priority on incorporating a substantial amount of stakeholder consultation and input as well as mechanisms for collaborative partnerships and informal dispute resolution
- There is a well-developed and effectively structured umbrella monitoring protocol for the Mt. Hood called LUCID (Local Unit Criteria and Indicator Development) initiative and completed in collaboration with Portland State University; annual monitoring summary reports are generated
- There are established mechanisms for regularly interacting with the neighboring Native American tribe, the Confederated Tribes of Warm Springs
- There is a substantial network of areas on the Forest that are reserved from commercial timber harvesting; in fact, well in excess of half of the forest is administratively or statutorily excluded from commercial timber management
- The NW Forest Plan standards and guidelines, incorporated into the Mt. Hood National Forest Land and Resource Management Plan in the mid-1990's, assure more than adequate conformance to many key watercourse and endangered species requirements found in the FSC Pacific Coast Regional Standard

But, given the breadth and detail of requirements found within the FSC certification standards, it is essentially impossible for any forest management unit to not be deficient relative to some components of, in this case, the FSC Pacific Coast Regional Standard. At this point in time, and on the basis of the information gathered during the scoping visit, the prospects for a positive outcome during the upcoming (simulated) full certification evaluation will be enhanced if the Mt. Hood managers make a commitment to address the following areas that presently constitute potential gaps of a more substantive nature:

- Regeneration harvesting of Type 1 old growth stands is most likely a major non-conformance with the FSC certification standards and the Forest Service will need to demonstrate that such harvesting is either being ceased or that the old growth stands at issue do not meet the FSC's definition of Type 1 due to factors such as fire exclusion
- Documenting/justifying the reason behind the partial estate engagement in the FSC process
- Developing a crosswalk document that demonstrates how the Forest Service is meeting the HCVF analytical and management requirements contained in Principle 9
- Pursuing strategies for more active management of the road system
- Securing more funding and staff resources to enable more effective management and control of illegal/unauthorized activities on the Forest
- Generally, demonstrating to the audit team, as best as possible, that the very substantial reductions (greater than 50%) in annual budgets and staff is not now leaving inadequate management infrastructure in place to effectively manage a 1 million acre forest estate on the periphery of a major metropolitan area that is resulting in burgeoning public use pressures

These issues/gaps notwithstanding, it is our preliminary sense that the type of forest management being practiced by the Forest Service on the Mt. Hood National Forest, while at present not adequately covering every base required by the FSC, nonetheless has the potential to be a very "good fit" with FSC-endorsed certification.

#### Findings Relative to the FSC P&C/Pacific Coast Regional Standard

As mentioned previously in this report, award of FSC-endorsed certification does not require perfection or across-the-board exemplary performance; deficiencies are acceptable provided that:

- the totality of the management program can be considered exemplary
- there is fundamental conformance with the breadth of each of the FSC *Criteria*<sup>8</sup> and any "fatal flaw" Indicators contained in the FSC Pacific Coast Regional Standard
- provisions, i.e., *Corrective Action Requests (CARs)*, are stipulated by the certifier and accepted by the certification applicant for addressing identified non-conformances relative to the applicable approved regional indicators, or interim indicators in regions without an approved regional standard.

In the context of the FSC P&C, this concept generally means that non-conformance at the Regional Indicator level is potentially certifiable<sup>9</sup> but non-conformance at the higher level of a Criterion is not certifiable. In light of this "decision rule," a certifier's accredited procedures must expressly ferret out criterion-level non-

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<sup>8</sup> As discussed later in this report, the audit team has concluded that FSC Principle 10 does not apply to the State Forest program and its possible certification under the FSC.

<sup>9</sup> There are some criteria or sub-criteria for which non-compliance would constitute an impediment to award of certification, regardless of offsetting strengths. Such "fatal flaw" issues include: use of GMO's, use of prohibited chemicals, conversion of natural forest to plantations, lack of a written management plan.

conformance that would preclude award of certification. In the SCS Forest Conservation Program protocols, this is accomplished through two mechanisms:

- *Fatal flaw indicators/scoring guidelines* present in the relevant approved regional standard. The Pacific Coast Regional Standard identifies Indicators 6.3.d, 6.4.c, 6.4.d and 10.5.b to be “fatal flaw” indicators. Non-compliance with a fatal flaw indicator triggers the issuance of Major CARs/pre-conditions (i.e., certification cannot be awarded).
- *Accredited evaluating protocols* that lead to findings of conformance at the criterion level by individually evaluating the separate sets of indicators associated with each criterion; this determination is down collectively by the full audit team, under the facilitation of the team leader employing group consensus methodologies.

## **FSC Principles & Criteria**

### **FSC Principle 1: Compliance with Laws and FSC Principles**

This FSC Principle is elaborated through a set of 6 Criteria that focus on issues such as conformance to all applicable national and local laws and regulations, payment of legally prescribed fees, taxes and royalties, protections against illegal harvesting and other unauthorized activities, and demonstrating a long-term commitment to adhere to the FSC Principles & Criteria.

#### Comments and Observations:

With regard to the 6 Criteria and 10 Regional Indicators that elaborate upon this Principle, it is our preliminary sense that management of the Mt. Hood National Forest can demonstrate acceptable conformance with all but two Criteria. While there are parties, most commonly environmental NGOs, that appeal and occasionally litigate agency decisions, it is our clear sense that Mt. Hood managers endeavor to and succeed at respecting applicable federal laws and regulations; indeed, this commitment to compliance with applicable statutes and regulations was strongly emphasized by senior Mt. Hood staff during the scoping visit. At the time of the full evaluation, Mt. Hood managers should be prepared to demonstrate that such appeals and litigation are not, in fact, *prima facie* evidence of non-compliance with legal requirements.

Criterion 1.3 focuses on compliance with international agreements and conventions and it is our sense that Mt. Hood managers will need to undertake additional actions in order to demonstrate adequate conformance. As is commonly the case with U.S.-based forest managers, Mt. Hood managers and field staff do not appear to have a solid and comprehensive awareness of which international agreements and conventions may be applicable and what the specific requirements may be. Beneficially, staff on the Fremont-Winema National Forest has recently compiled a list of applicable international conventions, treaties and agreements; this list is known to Mt. Hood staff and can be incorporated by reference into the Mt. Hood web site. But there remains a need to take actions aimed at assuring that all key staff on the Mt. Hood have adequate knowledge of this list and what implications, if any, exist for management of the Mt. Hood. A common corrective action request that is specified with regard to this Criterion is for forest managers to develop (or, in this case, adopt) a registry of applicable international agreements and conventions and to conduct a self assessment of the adequacy of compliance.

Criterion 1.6 addresses the somewhat vague issue of “commitment of the FSC Principles & Criteria.” Helpfully, the three regional indicators provide more focus and specificity, such as on “partial estate certification.” Clearly, the Forest Service’s present engagement in FSC certification falls under the rubric of partial estate certification and, as such, it will be necessary for the agency to provide a written justification for not submitting the entire national forest estate for certification review, at this point in time. This justification should include provisions that will be put in place, should the situation arise, to assure that the general public clearly understands which units have been certified and which have not.

Likewise, Mt. Hood managers (or, alternatively, the Washington Office) will need to publicly post a written statement expressing a commitment to manage the Forest in accordance with the FSC P&C, as augmented by the Pacific Coast Regional Standard. Under the FSC’s guidelines for partial estate certification, the Forest Service will also need to help the certifiers confirm that there are not situations on other national forest units not undergoing the certification process that could constitute a major non-conformance with the applicable FSC regional standard. That is, FSC-accredited certification bodies, per FSC guidelines, cannot evaluate a partial estate “in a vacuum” where circumstances on the remainder of the estate are not considered at all.

Overall, and provided that prior to a full evaluation the Forest Service expressly addresses the likely gaps associated with Criteria 1.3 and 1.6, it is our sense that a full evaluation would confirm adequate conformance to this Principle and to the 6 Criteria contained therein such that any observed gaps would not constitute a barrier to award of certification.

## **FSC Principle 2: Tenure and Use Rights and Responsibilities**

This FSC Principle, detailed through 3 Criteria, focuses on the long-term tenure and use rights to the land that is undergoing certification evaluation. Forest managers seeking FSC-endorsed certification must establish clear and legal ownership or right to manage the defined forest area that is being evaluated. Customary use rights, if clearly demonstrated, must be appropriately honored.

### **Comments and Observations:**

In the judgment of the SCS audit team, management of the Mt. Hood National Forest, like all units within the National Forest System, appears to be well positioned relative this FSC Principle, as indicated by the following observations:

- The tenure status of the Forest, and the legal right of the Forest Service to act as manager, is clearly not in question
- There is a demonstrable and exemplary track record of allowing customary uses and activities on the Forest; the Forest employs numerous citizen and tribal advisory mechanisms to help assure that management of Mt. Hood is compatible with community expectations, the extent possible within the regulatory framework in which the Forest is managed.

Overall, it is our clear sense that a full evaluation would confirm adequate conformance to this Principle such that any observed gaps would not constitute a barrier to award of certification.

### **FSC Principle 3: Indigenous Peoples' Rights**

This FSC Principle is concerned about the rights of indigenous peoples to own, use and manage their lands and territories. There are 4 Criteria that elaborate upon this principle. For most non-Indian owned lands in the U.S., the relevance of this Principle is pertinent with respect to protection of sites of special cultural or ecological importance and with respect to compensation for the application of traditional knowledge that can be attributable to defined indigenous peoples (note: we are not aware of any instance to date where this compensation obligation has been invoked; indeed, we find such a possibility to be highly unlikely in a socio-legal framework such as exists in the U.S.).

#### Comments and Observations:

In the judgment of the audit team, the applicable components of Principle 3 in the context of the management of a national forest unit are limited to Criteria 3.2 and 3.3.

With respect to Criteria 3.2 and 3.3, it is the audit team's preliminary judgment that the Forest Service managers of the Mt. Hood are operating in generally adequate conformance, though there are opportunities for improvement that might be identified in a full evaluation, either in the form of a recommendation or a corrective action request. These opportunities for enhanced conformance generally relate to pursuing more affirmative and innovative means of reaching out to and securing the active collaboration of neighboring tribes (e.g., Confederated Tribes of Warm Springs) in the identification of cultural resources and the development of appropriate management strategies.

Overall, it is our sense that a full evaluation would likely confirm adequate conformance to the applicable Criteria subsumed in this Principle such that any observed gaps would likely yield a minor rather than major corrective action request. Please note that the FSC standard speaks to affirmative outreach using culturally sensitive methods that enhance the likelihood of active dialogue and collaboration.

### **FSC Principle 4: Community Relations and Worker's Rights**

This FSC Principle, elaborated through 5 Criteria, addresses the effects of forest management on the well being of forest workers and local communities. The Criteria focus on issues such as: preferences for local employment, compliance with employee health and safety regulations, rights of workers to organize, completion of social impact assessments, and employee grievance resolution mechanisms. In short, this Principle expresses the position that exemplary forest management must include a conscious sensitivity to the interests of the most directly impacted stakeholders: employees, contractors and local communities.

#### Comments and Observations:

Criterion 4.1 addresses local opportunities for employment and other forest services. The Regional Indicators address issues such as overall quality of employment packages, preferences for local employment and processing, and contributions to public education. With respect to 6 of the 7 Regional Indicators that elaborate upon this Criterion, it is our sense that a full evaluation will reveal that the Mt. Hood is in very solid conformance. But Indicator 4.1.b may be an issue; this Indicator requires that employment conditions for non-local forest workers are as good as for local workers. The question that will need to be vigorously investigated as part of the full evaluation is whether or not working conditions for migrant laborers employed, for instance,

by planting and vegetation control contractors that operate on the Mt. Hood demonstrate conformance with this Indicator.

Criterion 4.2 requires conformance with all applicable laws and regulations with regard to human health and safety. Here, we conclude that the demonstration of conformance is not as clear and that it is likely that more emphasis on health and safety may be needed, particularly with respect to contractors operating on the Forest. This issue will need to be examined in the full evaluation and, if there are insufficient requirements for contractors, a corrective action request would likely be issued.

Criterion 4.3 deals with the right of employees and workers to organize and collectively bargain. We note that non-supervisory Forest Service employees on the Mt. Hood are unionized, which provides unambiguous evidence of their right to organize and collectively bargain. As with the safety issue, we do not at present have evidence to confirm that the rights to organize and collectively bargain are extended to employees of contractors that operate on the Mt. Hood. And more specific to the one Regional Indicator associated with this Criterion, we have not seen evidence confirming that the Forest Service requires its contractors to have effective dispute resolution mechanisms in place. To the extent that Forest Service contracts include standard provisions requiring contractors to comply with all applicable state and federal regulations, then minimally adequate conformance to this Criterion can likely be demonstrated for employees of contractors. If such provisions are not part of the standard contracts, a (simulated) CAR asking for such an inclusion would be likely as part of the main assessment.

Criterion 4.4 requires social impact evaluations as part of management planning and operations. It also requires stakeholder consultation. With respect to the first requirement, it is our sense that Mt. Hood managers do engage in periodic review of relevant socio-economic indicators, certainly more so than most private and non-federal forest managers and perhaps more than most national forest managers (e.g., Mt. Hood Annual Monitoring and Evaluation Report as developed under the LUCID initiative). As such, it is not likely that a finding of non-conformance would result from a full evaluation, but avoidance of a non-conformance would be enhanced if Mt. Hood managers provided the full audit team with a written summary of the means and methods by which they consider potential social impacts of their actions and policies. With respect to the second focus of this Criterion, stakeholder consultation, it is our clear sense that adequate conformance would be confirmed during a full evaluation. However, the new planning regulations are widely perceived by ENGOs as reducing their opportunities to provide meaningful input and we can anticipate this being an issue that arises during the audit team's stakeholder outreach as part of the full certification evaluation. We do take very positive note, however, of the strong emphasis placed by the Forest Supervisor on collaborative partnerships with a long list of stakeholder groups.

Criterion 4.5 focuses on dispute resolution mechanisms and, here, it is our preliminary judgment that the manner in which Mt. Hood managers seek to resolve conflicts informally and early are responsive to this Criterion. We also note that the appeals process and, after that, the court system provides an avenue of dispute resolution that constitutes clear evidence of conformance to this Criterion.

Overall, it is our sense that a full evaluation would confirm solid conformance to the Criteria associated with this Principle such that any observed gaps would not constitute a barrier to award of certification, were the Forest Service to decide to pursue certification upon the completion of these pilot tests.

## **FSC Principle 5: Benefits from the Forest**

This FSC Principle addresses several loosely related issues such as efficiency in the use of forest products, financial viability of the forest management operation, and diversity of environmental and social benefits from forest management. Principle 5 is elaborated through 6 Criteria. Of note, Criterion 5.6 requires that the rate of harvest not exceed levels that can be permanently sustained, perhaps one of the most focused and specific requirements found throughout the P&C. The other 5 criteria within this principle address matters such as balancing financial objectives with full cost accounting (including environmental costs), optimal use of harvested products and local processing, minimization of waste and residual stand damage, diversification of products from the forest, and protection of forest services such as watershed functions and fisheries values.

### **Comments and Observations:**

Clearly, the Mt. Hood National Forest generates important benefits to the people of northwest Oregon, southwest Washington and beyond, as well as citizens throughout the U.S. that perceive a stake in how our national forests are managed. Benefits associated with the Mt. Hood include:

- Timber (sawlogs, pulp logs, biomass chips) harvested from the Unit and that is earmarked for processing by the lone remaining sawmill in the county
- Employment opportunities, both directly with the Forest Service and through contractors and lessees
- Public outdoor recreational opportunities and the associated economic benefits to the regional economy of northwest Oregon and southwest Washington, through employment and user expenditures; such recreational opportunities also enhance the quality of life of the residents of the region
- Bio-diversity and habitat benefits of maintaining healthier forests on properties under management driven by stewardship rather than revenue maximization
- Quality watersheds—over 95% of the Forest is in a municipal watershed

This Principle also includes the issue of economic viability, more specifically the expectation that forest managers *strive toward* economic viability. While the long-term viability of the Forest Service’s management of the Mt. Hood is incrementally and cumulatively threatened by ongoing and deepening budget reductions, it is nonetheless clear that Mt. Hood managers have been active and creative in seeking/striving to maintain viability in the face of these shortfalls. But there is a limit to how long the Forest Service can “make do with less” before the overall program functionality suffers to a much more significant extent than as thus far been the case.

With respect to optimal use and local processing (Criterion 5.2), our impression is that Mt. Hood will be able to demonstrate adequate conformance during the main assessment. However, we are less confident about the issue of efforts undertaken to explore and develop new markets for common but less used species. We also take positive note of the fact that non-timber forest products are expressly addressed in the Mt. Hood LRMP. With respect to minimization of waste and damage to residual trees (Criterion 5.3), the auditors were able to make direct observations of a couple of active logging during the brief scoping visit and the available evidence clearly indicates that Mt. Hood managers place a high priority on waste minimization and avoiding residual stand damage. During the upcoming main assessment, the full audit team will be able to more effectively ascertain the level of conformance to this Criterion.

With respect to taking action to avoid dependence on a single forest product (Criterion 5.4), no evidence of obvious no-conformances arose during the scoping visit.

With respect to Criterion 5.5, where it requires that forest management recognizes, maintains and enhances the value of non-market forest services such as watersheds and fisheries, it is our strong sense that a full evaluation will lead to a finding a very solid conformance (notably, the Pacific Coast Regional Standard contains no regional indicators for this Criterion). It is our impression that Mt. Hood management is strongly oriented towards maintaining high quality water for the municipalities that derive their drinking water from the watersheds in which the Mt. Hood National Forest is located. As well, the Forest Service is engaged in a very active program of aquatic and riparian resource restoration on the Forest.

With respect to Criterion 5.6, we note that actual timber harvest levels are very substantially below maximum sustainable levels in the classic sense of that term as well as the allowable harvest levels generated through the LRMP process. In the context of FSC certification, conservative harvest levels such as has been the norm on the Mt. Hood for and least the past 15 years is very much a positive situation as it no doubt is associated with a much wiser and environmentally and socially exemplary balancing of timber and non-timber considerations than is typically associated with regimes oriented towards realizing maximum sustainable harvest levels. That said, the drastically reduced harvest levels on the Mt. Hood over the past 10-15 years has a down side, both with respect to regional socio-economic issues (a focus of other Criteria) as well as with respect to conformance with Regional Indicator 5.6.c. This Indicator addresses the issue of well-stocked stands and the relationship to harvest levels and stand-level harvesting practices. With respect to stand-level harvesting practices, our preliminary sense is that Unit timber management prescriptions—particularly commercial thins in planted stands--do indeed result in appropriate stocking levels. And, quite positively, the timber management program on the Mt. Hood is now focusing almost exclusively (?) on intermediate treatments in planted stands. But the problem is that due to the lack of adequate budgets and staff resources, there is a large backlog of overstocked stands in need of active management.

Overall, it is our sense that a full evaluation would confirm adequate conformance to the Criteria comprising this Principle such that any observed gaps may result in the issuance of findings of minor rather than major non-conformances.

## **FSC Principle 6: Environmental Impact**

This FSC Principle is elaborated by a set of 10 Criteria that focus on issues such as impact assessments, protection of listed species, biodiversity, reserve areas, stream-side and wetlands buffers, erosion control, exotic species, chemical use, high conservation value forests, and forest conversions. Of all the FSC Principles, this one is the most expansive in scope, with an associated high level of emphasis on data and information collection and analysis. Collectively, the thrust of this principle manifests a clear bias towards the maintenance and restoration of natural forest conditions.

### **Comments and Observations:**

Over the breadth of this expansive Principle, it is the audit team's preliminary judgment that the Forest Service's management of the Mt. Hood is generally consonant with the wide array of subjects addressed in this Principle. But there is one very substantial issue that is likely to be problematic: timber harvesting in stands that meet the FSC definition of Type 1 and Type 2 old growth. While it is likely that a full evaluation would

reveal non-conformances with perhaps several of the 72 Regional Indicators that have been specified for this Principle, it is our sense on the basis of the scoping visit that the distribution of these non-conformances would be such that there would still be a finding of adequate conformance with 9 of the 10 Criteria, Criterion 6.3 being the exception. At the field level, the auditors did not observe systematic and significant patterns where inappropriate levels of environmental impact are occurring as a result of forestry operations. Indeed, we observed circumstances indicating that forest management activities are now being carried out in a manner that avoids adverse impacts such as soil loss, rutting and compaction, watercourse degradation, damage to residual stands and non-timber vegetation, as well as loss of aesthetic quality. Resource management operations in the Unit appear to be conducted with competent and substantive consideration of potential adverse environmental impacts. Furthermore, the principal emphasis of the management program is on restoration activities. As well, the management approaches do not substantially rely upon chemicals, exotic species or conversion of forested areas to non-forest cover.

The issue of old growth management stands out as the single most problematic issue with respect to the attainment of FSC certification on the Mt. Hood. We take very positive note of the fact that timber management on the Mt. Hood is now focusing on intermediate stand treatments in planted stands and that there are no harvests contemplated in old growth stands for the next 10 years. But this assurance is offset by two factors:

- There is apparently still some harvesting in old growth stands taking place, under contracts awarded some years ago
- The Forest Service is reserving the right to return to the harvesting of previously un-entered old growth stands sometime in the future after the current emphasis on thinning planted stands runs its course.

With respect to Criterion 6.1, which addresses environmental impact assessments and is elaborated with 5 Regional Indicators, it is our preliminary judgment that the management of the Mt. Hood is in clear conformance. The Forest Service regulations place a very high priority on environmental analyses at multiple spatial and temporal scales. The basic theme of national forest management—now commonly referred to as ecosystem management—is to restore forest conditions to less altered states, closer to historic conditions. Analysis are carried out in advance of site-disturbing activities; all significant actions in the field result from a process of elaborating and selecting from a set of alternative courses of action, per NEPA requirements.

With regard to addressing threatened and endangered species issues (Criterion 6.2, augmented with 3 Regional Indicators), the auditors did not observe anything that would indicate a major gap. Indeed, it is our sense that management of all national forest units, not just the Mt. Hood, has been marked for well over a decade by a major emphasis on maintaining/enhancing habitat conditions for federally listed species. Relative to the 3 Regional Indicators for this Criterion, it is our sense that a full evaluation would likely confirm a solid level of conformance.

FSC Criterion 6.3, focusing on the maintenance of ecological functions and values, is quite expansive in scope, as indicated by 6 sub-criteria that each have between 3 and 5 Regional Indicators. As discussed above, it is our preliminary judgment that a full evaluation of the agency's management of the Mt. Hood will lead to a conclusion that the program not only maintains but enhances ecological functions such as forest regeneration and succession, biological diversity, and natural cycles *with the exception of the matter of old growth management*. That is, the management regimes and policies now in place on the Mt. Hood generally are leading to ecologically healthier forests, over time.

Underscoring its significance of the old growth subject area, sub-criterion 6.3(d) of the Pacific Coast Regional Standard, which addresses old growth, has been designated a “fatal flaw” requirement. This means that certification is precluded in the event of a finding of non-conformance with this sub-criterion (i.e., a Major CAR is required). Throughout the Pacific Coast region, and on federal lands in particular, the certification standards “place the bar high” with respect to requiring:

- No entry/harvest in Type 1 old growth stands
- No net loss of acreage of Type 2 and Type 3 old growth stands

Old growth is a particularly significant issue on the Mt. Hood National Forest (as with most western national forest units) due to the fact that most of the forested areas that have not been clearcut since the advent of intensive management starting in the 1960’s-1970’s qualify as one of the three types of old growth. As such, the no entry/no net loss requirement is relevant to timber management operations taking place in stands other than second growth thinning operations.

Based upon the information gathered during the scoping visit, it is our sense that:

- Areas within the Mt. Hood meeting the definition of Type 1 old growth were still being scheduled for regeneration harvesting as recently as a few years ago and, in fact, there is some limited harvesting of old growth stands still taking place under the sales sold some years ago.
- Harvesting prescriptions applied in Type 2 old growth have not met the “no net loss” requirement found in the FSC standard.

Another issue that falls within the scope of C6.3, perhaps somewhat less controversial but nonetheless a “hot button,” is salvage logging after wildfire. It is our understanding that several if not all of the salvage sales offered on the Mt. Hood over the past several years have been appealed by ENGOs. While the filing of an appeal is not prima facie evidence of impropriety, it does nonetheless raise questions about the adequacy with which the Forest Service is balancing ecological and economic considerations, as required by Regional Indicator 6.3.c.4. At the time of the full evaluation, Mt. Hood managers should expect that the audit team will investigate salvage timber sales in some detail and, as such, Mt. Hood managers should be prepared to demonstrate how ecological considerations are being appropriately factored into the decisions of where and how to salvage harvest.

Criterion 6.4 pertains to a representative system of reference areas. It is our sense that an appreciable portion of the Mt. Hood is allocated to “management areas” that function as reference areas. We are not as sure as to the ecological representivity of the current array of such reference areas and the extent to which the establishment of such areas incorporates public input. At the time of the full evaluation, Mt. Hood managers should be prepared to present evidence with respect to both representivity and public involvement.

Criterion 6.5 requires written guidelines to avoid environmental impacts. Further, the Regional Indicators associated with this Criterion speak to field conditions that should be observable in response to adherence to these written guidelines. With respect to written guidelines, it is our clear sense that the Forest Service can easily demonstrate solid conformance, with its full array of standards and guidelines for all aspects of national forest management. But with respect to the components of this Criterion that focus on field conditions (which most of the Regional Indicators in fact focus on, despite the thrust of the Criterion, itself), our

preliminary assessment is more mixed. In particular, it is our sense that there may be gaps that are revealed in the full evaluation with respect to:

- Indicator 6.5.g: It is our preliminary sense that the Mt Hood’s road system, and the planning that supports it, may not be found to be in adequate conformance, especially relative to the strong emphasis on a well-planned/designed road network that is envisioned in this Indicator
- Indicator 6.5.i: This Indicator speaks to “controlling” and “restricting” access to road segments that “are not immediately needed for purposes of management.” While such an expectation should appropriately be balanced against public use considerations, we nonetheless have a preliminary sense that Mt. Hood managers could be more active and strategic in closing off non-critical road segments; this issue will become all the more important over time as public use pressures increase
- Indicator 6.5.l: This Indicator directs that unnecessary roads are permanently decommissioned or “put to bed.” While there is a road decommissioning program on the Mt. Hood, budget reductions have substantially limited the level of activity.
- Indicator 6.5.t: This Indicator requires that cattle/sheep grazing is controlled in order to protect riparian vegetation and stream channel banks. We did not have the opportunity to investigate grazing on the eastside of the Forest during the scoping visit, but there will be focused attention on this topic during the main assessment including field visits on the eastside. Grazing is a controversial land use on the National Forests, generally, and the Mt. Hood managers should be prepared to provide evidence that its management of grazing on the eastside complies with this Indicator
- Indicator 6.5.u: Here, the regional standard addresses stream crossings and elimination of impediments to fish passage. We note that the Forest Service is engaged in an active program of eliminating fish passage impediments on the Mt. Hood but the key issue is whether or not current and expected funding levels will enable the problem to be addressed and eliminated in a reasonable time frame.

It is our sense on the basis of the scoping visit that the current level of conformance with the full scope of Criterion 6.5 may be marginal and the common underlying cause may be inadequate funding to carry out important field-level restoration and control activities.

Criterion 6.6 focuses on chemical use. More accurately, it focuses on the expectation that forest managers employ every effort to avoid and/or minimize chemical use. Further, there are certain chemicals that simply cannot be used on certified forests (WHO Type 1A and 1B chemicals). Generally, we note that the Forest Service uses very little in the way of chemical herbicides on the Mt. Hood and elsewhere. As such, it is our sense that a full evaluation would confirm a solid conformance to the “avoid and minimize” aspect of this Criterion.

However, Criterion 6.6 also prohibits the use of a specific (and expanding) list of chemical substances. The Forest Service is possibly using a few chemicals that are prohibited from use on FSC certified forests and that will have to be ceased prior to award of certification. Of note, the list of prohibited chemicals on FSC-certified forests was substantially increased in November, 2005. If these chemicals are still in use at the time of the full evaluation, the audit team will be obligated to issue a (simulated) Major CAR. Prior to a full evaluation, the appropriate personnel Mt. Hood National Forest should secure the list of prohibited chemicals to compare with the list of chemicals used on the Unit. The list of chemicals used should also be conveyed to SCS prior to or during the full evaluation.

Criterion 6.7 deals with disposal of hazardous materials and, here, the audit team did not observe any significant nonconformance issues in the field. At the time of the full evaluation, Mt. Hood managers should be prepared to present to the audit team an overview of its chemical disposal and safety procedures, such as spill management/containment protocols and off-site disposal protocols. But, all in all, we consider it relatively likely that adequate conformance can be confirmed at the time of the full evaluation.

In that biological control agents and/or genetically modified organisms (GMOs) are not employed on the Mt. Hood, Criterion 6.8 is largely non-relevant. Criterion 6.9 deals with the use of exotic species. It is our understanding that Forest Service on the Mt. Hood National Forest does not employ exotic species, with the possible exception of grass mixes used to cover bare soil.

Finally, Criterion 6.10 deals with conversion of forests to non-forest uses. On the basis of the scoping visit, we consider this issue to be essentially irrelevant as no forest conversions to non-forest uses is taking place or is contemplated to take place on the Mt. Hood.

### FSC Principle 7: Management Plan

This Principle is elaborated through 4 Criteria, which collectively call for a very high level of commitment to management planning. A public summary of the management plan is required, as are regular updates to that public summary.

#### Comments and Observations:

Criterion 7.1 requires that certified forests are guided by a written management plan that covers an enumerated list of subjects, both bio-physical and socio-economic. Our review of the body of documents that collectively comprise the “management plan” for the Mt. Hood leads us to the preliminary conclusion that the main assessment will reveal a solid level of conformance to this Criterion.

Criterion 7.2 requires that the management plan is periodically revised to incorporate results of monitoring or new scientific and technical information as well as to respond to changing environmental, social and economic circumstances. The most obvious issue related to this Criterion is that the Mt. Hood LRMP was written in the late 1980’s on the basis of information collected from the mid- to late 1980’s, with the intent that it would undergo a major revision in 10-15 years. Due to ongoing budget cuts throughout the Forest Service, almost all LRMPs are now well past the intended dates for revision—this is the case for the Mt. Hood, as well. At present, we are told that the Mt. Hood will be scheduled for a plan revision in 2011 which means that it will be in excess of 20 years from the date of finalization of the LRMP—hardly an exemplary situation. On the positive side, there have been numerous plan amendments (most notably, the mid-90’s incorporation of the NWFP standards and guidelines into all westside forest plans) that have been made since 1990. These amendments have, we feel, done a pretty decent job of maintaining the overall currency and relevance of the LRMP. But the inability to undertake a major plan revision on schedule is another of the significant negative ramifications of the ongoing budgetary constraints. A minor non-conformance is likely to be an outcome of the main assessment.

Criterion 7.3 addresses training of workers and employees so that the plan can be adequately implemented. It is our preliminary judgment that the Forest Service places a strong emphasis on maintaining current skills of its salaried employees. However, we note that efforts to maintain up-to-date employee records

of training received have not been maintained in recent years, thereby making it more difficult for the FS to demonstrate conformance. We are less certain as to the adequacy of the Forest Service's commitment to assuring that employees of contractors operating on the Mt. Hood receive adequate training.

Criterion 7.4 requires that a public summary of the management plan be made publicly available. As a public agency, all plans generated by the Forest Service are, we assume, publicly available. The publicly available annual Mt. Hood National Forest Monitoring and Evaluation Report (tiered to the Mt. Hood LRMP) also helps to provide the public with periodic updates of activities on the Forest. Overall, we anticipate that the main assessment will reveal solid conformance to this Criterion.

Overall, it is our sense that the main assessment will result in a finding of generally adequate conformance with this Principle. While we take positive note of the actions taken over the past 15 years to maintain the currency of the LRMP as well as the recent development of the Mt. Hood National Forest Strategic Stewardship Plan, it is possible that the main assessment as well as a ramped up time frame that would assure a speedier completion of the Forest Plan revision, than is currently likely to be the case.

### **FSC Principle 8: Monitoring and Assessment**

As a conceptual and thematic companion to Principle 7, this Principle (elaborated through 5 Criteria) requires certified operations to engage in an aggressive and formal program of periodic monitoring of the impacts of management operations, focusing upon both bio-physical and socio-economic impacts as well as the extent of plan compliance. Chain of custody is also addressed within this Principle (Criterion 8.3).

#### **Comments and Observations:**

Criterion 8.1 requires forest monitoring, particularly as tied to plan components, scaled to the size and intensity of operations. It is our preliminary sense that the level of monitoring of forest conditions on the Mt Hood is reasonably solid and in fact may be above the level of effort found on other National Forests in the Region. We take very positive note of the annual monitoring conducted in the context of the C&I's developed under the LUCID initiative and the exemplary annual reports that are produced. Overall, we anticipate that the main assessment will find good conformance with this Criterion, though there may a minor non-conformance with respect to monitoring of social impacts of Mt. Hood management.

Criterion 8.2 addresses research and data collection; notably, the Criterion explicitly lists five different subject areas upon which research and data collection should be focused. Generally, it is our preliminary sense that an appreciable amount of research and data collection is taking place on the Mt. Hood or, more broadly by the Forest Service throughout the western U.S. with relevance for the Mt. Hood. But it is our understanding that some basic types of inventory work, including timber resource inventory activities, are no longer being undertaken due to budgetary constraints.

Regional Indicator 8.2.d.5 represents a likely gap, though it would most likely be addressed through a Minor CAR rather than a Major CAR. It is our understanding that while there is active tribal interaction, there is not a express invitation to, for instance, the CTWS to engage in joint monitoring of special significance in order to more effectively assess the adequacy of the management prescriptions applied to those areas.

One subject listed in this Criterion that is commonly an issue (gap) for forest operations seeking certification is monitoring of social impacts. But the evidence provided during the scoping visit suggests that the Mt. Hood may be on the vanguard in conformance with this requirement. However, this will be investigated more thoroughly by the two forest sociologists that will serve on the main assessment audit team and it is possible that a minor non-conformity finding might arise, asking the Forest Service to more comprehensively report on the results of social impact monitoring.

Criterion 8.3 deals with chain-of-custody. Here, we note that the Forest Service sells standing trees and, as such, its CoC obligations are very limited. The main requirement is that the agency must keep accurate records of all sales—volumes (estimates if that is all that is available), species, date of sale, name of purchaser. This information, as necessary, can play a key role in allowing FSC to reconcile the flow of certified material through the supply chain. Aside from this obligation, managers of FSC certified forests can do a great service to the regional forest products industry, and to the interests of the segment of the forest products industry that trades in certified product, by helping to educate the industry on its CoC obligations. Specifically, all purchasers of timber sales on the Mt. Hood will need to hold a CoC certificate or be expressly covered by another party's certificate *if the certified status of federal timber is to be maintained once the timber leaves the Mt. Hood*. Award of certification requires that a “documented control system” be developed and submitted to SCS. This DCS would be, in this case, a relatively brief document in which the Forest Service's limited CoC obligations are described, including specification of individuals/staff positions responsible for key tasks.

Criterion 8.4 requires that the results of monitoring be incorporated into management planning. Given the state of the management planning process, as discussed above, it stands to reason that the manner by which monitoring results are incorporated into management planning is likewise in a present state of inadequate conformance to this Criterion. Hopefully, the Forest Plan revision process that will be undertaken in 2011 will be able to better demonstrate that results and findings of monitoring undertaken on the Mt. Hood over the past number of years are being incorporated into/informing the new plan.

Criterion 8.5 requires a public summary of the results of monitoring activities. Here, we see what appears to be exemplary conformance, specifically the annual Mt. Hood Monitoring and Evaluation Reports.

### **FSC Principle 9: Maintenance of High Conservation Value Forests**

This FSC Principle is elaborated upon through 4 Criteria that collectively focus on the identification and appropriate management of areas within the defined forest area(s) that possess notable attributes meriting conservation. Such attributes may be ecological or social, in nature. Areas of high conservation value are to be managed so that the defining attributes are maintained or enhanced; focused monitoring must be undertaken with respect to efficacy of HCVF management strategies.

#### **Comments and Observations:**

More so than perhaps any other Principle, P.9 requires the certified landowner to engage in some explicit analyses that are not commonly undertaken without a solid knowledge of and commitment to the P&C. That is, P9 requires actions that are unlikely to have been undertaken by an operation not already certified. The reason for this is that the entire concept of *high conservation value forests* is somewhat of an odd fit to North American forest managers, at least in the terms used by the FSC and in the manner in which there is a need to

engage in stakeholder consultation. Although, and with the notable exception of Type 1 and 2 old growth stands that are still under active timber sale contracts or that could be scheduled for regeneration harvest in the future, we do not believe that Forest Service's management of the Mt. Hood is resulting in the loss or degradation of areas meeting the FSC's definition of "high conservation value forests," the fact remains that P.9 places some affirmative procedural obligations on forest managers to expressly address, obligations that the Mt. Hood managers cannot adequately demonstrate it is meeting at this point in time without some sort of summary document. To be found in adequate conformance to P9, Unit managers will need to demonstrate in some sort of summary cross-reference presentation that it collectively addresses, in a reasonable and functionally equivalent form, the following activities:

- defining those attributes that merit designation as high conservation value
- determining the presence of HCVFs on the Mt. Hood National Forest, including some focused consultation with outside stakeholders,
- developing appropriate guidelines for the management of identified areas of HCVF
- developing monitoring protocols designed to assess the effectiveness of the HCVF management guidelines

It is our sense that the Forest Service is already covering these basis (except for Type 1 and 2 old growth subject to regeneration harvesting), but in a format and employing terms that do not provide for a concise and comprehensive verification that P.9 is being adequately addressed. But, when all is said and done, the Mt. Hood managers must nevertheless provide a reasonable demonstration that they understand their obligations regarding Principle 9 and that they are taking appropriate actions to meet those obligations. This Principle is an area of deficiency for most FSC certified operations, at this point in time, and we do not expect that, at the time of award of certification, that a complete treatment of HCVF has been completed. But it will be necessary, for award of certification, that the Forest Service demonstrate that it understands the expectations, has initiated a strategy, and is committed to completing the tasks in a reasonable time frame.

But again, it is our sense that the Forest Service is already covering the necessary HCVF bases to a pretty decent extent but that it is just not covered under a single comprehensive process nor described in a single comprehensive document. To that extent, the agency's task is more one of compilation and exposition rather than additional substantive analytical work.

### **FSC Principle 10: Plantations**

This FSC principle, elaborated through 9 Criteria, provides additional certification requirements specific to those operations where the nature and intensity of management practices and regimes is such that most, if not all, of the characteristics of a natural forest are absent. That is, plantations under the FSC use of the term are defined by the totality of the management regime, not on the means of stand establishment (e.g., clearcut and plant). The 9 Criteria address issues such as: plantation management objectives, diversity in the composition of plantations, plantation design and layout, natural areas within the plantation operation, control of pests and pathogens, periodic monitoring and conversion of natural forest to plantations. In brief, areas supporting natural forest cannot be converted to plantations through the use of plantation forest management regimes.

### **Comments and Observations:**

At issue is whether or not the type of forest management practiced on the Mt. Hood National Forest constitutes “natural forest management” or “plantation forest management” as defined by the FSC. As the Forest Service is not practicing short-rotation even-aged management and is not employing non-native tree species in its planted stands on any national forest units in Region 6, it is a simple matter to determine that the forest management being practiced on the Mt. Hood unambiguously falls under the category of “natural forest management.” Accordingly, Principle 10 is not applicable to this pilot test.

**Summary Table of Potential Non-Conformances Relative to the Regional Indicators**

**Note: The following table identifies those FSC Criteria and Indicators for which, based upon the scoping visit, there is an indication that management of the Mt. Hood National Forest may presently be in non-conformance. Due to the nature of scoping visits (gap analyses), both false positive and false negative conclusions can arise; only a full certification evaluation can definitively ascertain conformance and non-conformance to the certification standard. Corrective actions undertaken by the Forest Service prior to a full certification evaluation (simulated) could eliminate numerous of the presently identified potential gaps.**

**Note, also, that while there are numerous potential non-conformances identified and briefly discussed below, it is our sense that, overall, most components of the Mt. Hood National Forest management program are in a relative strong position relative the FSC certification standards.**

<b>C1.1 Forest management shall respect all national and local laws and administrative requirements.</b>	
1.1.a. The applicant’s forest management plans and operations in the region demonstrate compliance with federal, state, county, municipal, and tribal laws, as well as case law and regulations.	Pending and recently resolved lawsuits against the Forest Service in which the courts have sided with plaintiffs serve to detract from a demonstration of conformance with this indicator.
<b>C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.</b>	
1.3.a. Forest owners or managers comply with treaties, including those with American Indian tribes, and other international agreements that have been signed by the President of the United States, ratified by the Senate and have entered into force. (Note: see Analysis of US Government Procedures for Abiding with Treaties, FSC-US, 3/10/03).	As part of the pilot test on the Lakeview FSU, a list of applicable international agreements, conventions and treaties has been compiled and posted on the Fremont-Winema N.F. web site. Mt. Hood managers should incorporate this list onto the Mt. Hood web site, augment if appropriate, and then provide evidence that a self-evaluation as to the level of awareness of and conformance to the requirements contained therein has been conducted.
<b>C1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and by the involved or affected parties.</b>	
1.4.a. Any perceived, possible conflict between US law and FSC P&C shall be referred to FSC ABU.	Conformance would be clearly demonstrated if there was a written policy stating that the Mt. Hood managers will bring any such conflicts to the attention of the certification body.
<b>1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</b>	
1.5.a. Forest owners or managers implement measures to	Due to the proximity to a major population center, illegal and

prevent illegal and unauthorized activities in the forest.	unauthorized public use is a significant and growing management challenge on the Mt. Hood. The very significant reductions in LEO and FPO staff positions on the Forest as well as reduced operating budgets runs counter to a demonstration of conformance to this Indicator and Criterion
<b>C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</b>	
1.6.a Forest owners or managers provide written statements of commitment to the FSC Principles and Criteria. The commitment is stated in the management plan [see 7.1], a document prepared for the certification process, or another official document.	Commitment to FSC P&C is the litmus test, not just a generic commitment to sustainable forest management. A written statement of commitment posted on the Mt. Hood web site would constitute an adequate demonstration of conformance.  Aside from a written commitment to the P&C, the FSC is now emphasizing the requirement that managers of FSC-certified forests must have a demonstrable working knowledge of the applicable certification standard, which in this case is the Pacific Coast Regional Standard. At this juncture, the level of working knowledge of the standard amongst the Forest Service staff responsible for the management of the Mt. Hood is not adequate.
1.6.b Forest owners or managers document the reasons for seeking partial certification.	Were this a real certification project, the Forest Service would need to submit a written justification as to why only five national forests and not the rest of the national forest system is being put forward in the FSC certification process.
<b>C3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</b>	
3.2.b. Forest owners or managers invite the participation of tribal representatives in jointly planning forestry operations that affect tribal and other American Indian resources.	During the full certification evaluation, it will be helpful if evidence is provided as to <i>affirmative</i> efforts undertaken by FS personnel to invite active participation (not just passive responses to requests for comments) of tribal representatives in joint planning activities, where appropriate.
<b>3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.</b>	
3.3.b. Forest owners or managers and tribal representatives jointly develop measures to protect or enhance areas of special significance.	Likewise for this Indicator, evidence should be provided of affirmative efforts to secure active collaboration with CTWS but with the focus on efforts to jointly develop protection measures, where appropriate
<b>C4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</b>	
4.1.b. The conditions of employment are as good for non-local workers as they are for local workers doing the same job (e.g., remuneration, benefits, safety equipment, training, and workman's compensation).	The recent investigative news stories published in the Sacramento Bee and also addressed in several national television news programs highlight an issue that perhaps is most publicized on the national forests but that applies throughout North America: are migrant workers doing forestry work such as vegetation management and planting being exploited? This question will need to be explored vigorously during the main assessment.
4.1.f. Forest owners or managers and their contractors comply with the letter and intent of applicable state and federal labor laws and regulations ( <i>see also 1.1.a</i> ).	Conformance with MSPA is an issue that will need to be explored during the main assessment.
<b>4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labour Organization (ILO).</b>	

4.3.a. Forest owners or managers and their contractors develop effective mechanisms to resolve disputes between workers and management.	Does the FS mandate and monitor that contractors have “effective mechanisms to resolve disputes between workers and management?”
<b>4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups directly affected by management operations.</b>	
4.4.c. Significant archeological sites and sites of cultural, historical, or community significance, as identified through consultation with state archeological offices, tribes, universities, and local expertise, are designated as special management zones or otherwise protected during harvest operations.	It is possible that the main assessment will determine that there is inadequate conformance with respect to inviting and securing active tribal involvement in the identification and protection of culturally significant resources and sites.
<b>5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.</b>	
5.2.b. New markets are explored and developed for common, but less-used, species (e.g., alder, tanoak, and madrone), grades of lumber, and/or an expanded diversity of forest products (e.g., small diameter logs, flooring).	We did not get the impression that much emphasis is being placed on marketing minor forest species and products; this may be an opportunity for the FS to inform the full audit team about activities/efforts that are responsive to this Indicator
<b>C5.6. The rate of harvest of forest products shall not exceed levels that can be permanently sustained.</b>	
5.6.c. The rate and methods of harvest lead to well-stocked stands across the forest management unit (FMU). Under-stocked and over-stocked stands are returned to fully stocked levels at the earliest practicable time.	The limited amount of timber harvesting on the Mt. Hood is contributing to a situation of generally overstocked stands, adversely impacting stand health and vigor. The current emphasis on thinning operations in planted stands is positive relative to this Indicator.
<b>6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including:</b> a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem. d) Old-growth stands and forests e) Retention f) Even-aged silvicultural systems	
6.3.c.4. Prescriptions for salvage harvests balance ecological and economic considerations.	The fact that salvage sales on the Mt. Hood have been appealed and litigated by ENGOs raises questions as to conformance with this Indicator; Forest managers should be prepared to provide evidence that ecological considerations are being appropriately addressed in the design and execution of fire salvage timber sales.
<b>C6.3.d. Old-growth stands and forests<sup>10</sup></b>	It is our understanding that essentially the entire forested portion of the Mt. Hood qualifies as at least Type 3 old growth except for those areas that were clearcut and planted during the 1960's to 1990's. In fact, much of the areas not occupied by planted stands meets the Type 1 old growth definition, though none of the forest is free from past and ongoing anthropomorphic influence, such as through fire exclusion. But the definition for Type 1 is not “free from human influence” but, rather, “never been logged.” By that standard, there are large extents of the Forest that are Type 1.

<sup>10</sup> Sub-criterion 6.3.d is designated as a “fatal flaw” requirement in the Pacific Coast Standard. As such, non-conformance with this sub-criterion precludes award of certification (i.e., a Major CAR must be specified in the event of a finding of non-conformance).

<p><i>This section uses the following definitions:</i></p> <p><i>Type 1</i> stands are those stands of at least 20 contiguous acres that have never been logged and that display late successional/old-growth characteristics. Stands that have never been logged, but which are smaller than 20 acres, are assessed for their ecological significance, and may also be classified as Type 1 stands. Areas containing a low density of existing roads may still be considered Type 1 stands, provided the roads have not caused significant, negative ecological impacts.</p> <p><i>Type 2</i> stands are old unlogged stands smaller than 20 acres that are not classified as Type 1, and other stands of at least 3 contiguous acres that have been logged, but which retain significant late-successional/old-growth structure and functions.</p> <p><i>Type 3</i> stands are those that have residual old-growth trees and/or other late-successional/old-growth characteristics, but do not meet the definition of a Type 2 stand.</p>	
6.3.d.1. Non-tribal Type 1 stands are not harvested	Strict adherence to this requirement is crucial and, in fact, this constitutes the single most significant likely non-conformance on the Mt. Hood, at least up to this point in time. On the positive side, we have been informed that there are and will be no planned regeneration harvests in natural stands for at least the next 10 years.
6.3.d.2. Management activities adjacent to Type 1 stands are conducted to minimize abrupt forest/opening edge effects and other negative impacts on the ecological integrity of these areas.	Have buffers been established around all type I stands or are there other mechanisms in place for assuring that abrupt forest/opening edge effects are avoided?
6.3.d.3. Timber harvests in Type 2 and Type 3 stands maintain late-successional/old-growth structures, functions, and components, including individual trees that function as refugia. There is no net decline in the area or the old-growth characteristics of Type 2 or Type 3 stands due to forest management, with the exception of Type 3 stands that are elevated to Type 2 stands.	Harvesting in old growth stands in the recent past—and perhaps still today with regard to the final stages of timber sales awarded some years ago—is not likely to be found in conformance with this requirement as it is likely that many regeneration harvest entries in Type 1 or 2 old growth have resulted in a conversion to Type 3 stands.
<b>C6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</b>	
6.4.c. The size and extent of representative samples on public lands being considered for certification is determined through a science-based (e.g., gap analysis, regional reserve design principals and methodologies), transparent planning process that is accessible and responsive to the public.	At the time of or prior to the full certification evaluation, it would be helpful if a summary was prepared that describes the “science-based transparent planning process that is accessible and responsive to the public” that was used in support of the establishment of representative sample/natural areas on the Mt. Hood.
<b>C6.5. Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.</b>	
6.5.g. The transportation system is pre-planned, designed, located, constructed, maintained, and/or reconstructed to minimize the extent and impact of the system and its potential cumulative adverse effects.	Budgets and staff allocated to road system maintenance may not be at levels associated with exemplary performance relative to this Indicator
6.5.i. Access to temporary and permanent roads is controlled to minimize impacts to soil and biota while simultaneously allowing legitimate access as addressed by Principles 3 & 4 and identified in the management plan. Access is restricted to roads that are not immediately needed for purposes of management.	
6.5.t. Grazing by domestic animals is controlled to protect the species composition and viability of the riparian vegetation and the banks of the stream channel from erosion.	The potential adverse environmental impacts of cattle grazing will be an issue that the full audit team will need to examine closely, with a focus on the eastside of the Forest.
6.5.u. Stream crossings are located and constructed to minimize fragmentation of aquatic habitat ( <i>see Glossary</i> ), maintain water quality, and either to accommodate a 100-year peak flood event or to limit the consequences of an unavoidable failure. Road crossings, dams, and other human-made structures that impede fish passage are removed or modified to enable passage, taking legal or environmental constraints into account.	It is likely that the drastically reduced funding levels for aquatic restoration on the Mt. Hood raises questions as to the level of conformance with this Indicator

<p><b>C6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</b></p>	
<p>6.6.a. Forest owners and managers demonstrate compliance with FSC Policy paper: “Chemical Pesticides in Certified Forests, Interpretation of the FSC Principles and Criteria, July 2002” and comply with prohibitions and/or restrictions on World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement.</p>	<p>The FS will need to provide SCS with a comprehensive list, by trade name and constituent content, all chemical herbicides and pesticides used on the Mt. Hood.</p>
<p><b>C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</b></p>	
<p>6.9.b. Forest owners or managers develop and implement control measures for invasive exotic plants.</p>	<p>At the time of the full certification evaluation, Mt. Hood managers should be prepared to demonstrate that there is, in fact, an active program in place for controlling the spread of exotics.</p>
<p><b>7.1. The management plan and supporting documents shall provide:</b>  <b>a) Management objectives.</b>  <b>b) Description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.</b>  <b>c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories.</b>  <b>d) Rationale for rate of annual harvest and species selection.</b></p>	
<p>7.1.a.1. A written management plan is prepared that:  (1) includes the landowner's vision (ecological, silvicultural, social, and economic), desired future conditions, potential future outcomes, goals, and objectives, as well as short-term and long-term actions and  (2) incorporates strategies for the maintenance, enhancement, and/or restoration of forest resource. The actions and objectives are specific, achievable, measurable, and adaptive. (The elements of a comprehensive forest management plan are found in Appendix H.)</p>	<p>The issue is the currency of the Mt. Hood LRMP, even with the NWFP amendments and other amendments. Waiting until 2011 to develop a new plan for the Mt. Hood is not a strong level of conformance to the FSC planning requirements. Again, this is funding-driven non-conformity issue.</p>
<p><b>C7.2. The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.</b></p>	
<p>7.2.a. Relevant provisions of the management plan modified:  (1) every 10 years or in accordance with the frequency of harvest for the stand or forest, whichever is longer; (2) in response to effects from illegal and/or unauthorized activities (e.g., damage to roads, depletion of timber and non-timber resources); (3) in response to changes caused by natural</p>	<p>On the positive side, the Forest Service has actively sought to develop plan updates and amendments in order to maintain the currency of guidance for field activities. Of particular note in this regard is the Northwest Forest Plan developed in 1994 and subsequently incorporated into all of the “westside” forest plans, including Mt. Hood. Another very positive development</p>

disturbances.	is the recent completion of a "Mt. Hood Strategic Plan" though this is not a NEPA document and its content is not in conformance with the breadth of issues enumerated in Criterion 7.1. On the negative side, the Forest Plan is presently several years past due for a major revision and present plans do not call for the plan revision effort to occur before 2011, another 5 years. This can hardly be considered strong conformance to this Indicator.
<b>C7.3. Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.</b>	There appears to be a strong emphasis on workforce training but record keeping and consistent administration of the training activities is generally deficient.
<b>C7.4. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.</b>	Generally, the Forest Service demonstrates strong conformance because, as a public agency, all planning documents are publicly available. But an up-to-date summary of the body of documents that constitute the Mt. Hood forest plan would be helpful in more affirmatively demonstrating conformance with this Criterion.
<b>C8.1. The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</b>	
8.1.a. Implementation of the management plan is periodically monitored to assess: <ul style="list-style-type: none"> <li>▪ the degree to which management vision, goals, and objectives have been achieved</li> <li>▪ deviations from the management plan</li> <li>▪ unexpected effects of management activities</li> <li>▪ social and environmental effects of management activities</li> </ul>	While there are an array of activities that credibly fall under the rubric of "monitoring" on the Mt. Hood, a compilation or umbrella monitoring plan is presently lacking.
<b>8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators:</b> <ol style="list-style-type: none"> <li>a) Yield of all forest products harvested.</li> <li>b) Growth rates, regeneration and condition of the forest.</li> <li>c) Composition and observed changes in the flora and fauna.</li> <li>d) Environmental and social impacts of harvesting and other operations</li> <li>e) Cost, productivity, and efficiency of forest management</li> </ol>	
8.2.a.2. The forest owner or manager maintains records of the yield of harvested non-timber forest products.	While permits for the removal of non-timber forest products are required, yields may not be recorded.
8.2.d.3. Generation or maintenance of local jobs and public responses to management activities are monitored.	We are not aware of current activities that would demonstrate adequate conformance with this Indicator.
8.2.d.4. The influence of forest management on the viability of forest-based livelihoods is monitored, especially in the case of large forest holdings.	Likewise for this Indicator.
8.2.d.5. The opportunity to jointly monitor sites of special significance ( <i>see also criteria 3.2 and 3.3</i> ) is offered to tribal representatives in order to determine adequacy of the management prescriptions.	If such an offer to the Confederated Tribes of Warm Springs to jointly monitor sites of tribal significance has been extended, evidence should be presented during the full evaluation.
<b>C8.3. Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."</b>	A chain-of-custody "documented control system" must be developed if on-product claims (e.g., sale of FSC certified logs or lumber) are desired to be made and if the timber harvested from the Mt. Hood is to enter the supply stream as FSC-certified material.
<b>P9 Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation</b>	It is our sense that areas within the Mt. Hood National Forest meeting the FSC definition of "high conservation value forest areas" are, in fact, being adequately identified and appropriately

<p><b>value forests shall always be considered in the context of a precautionary approach.</b></p>	<p>managed, even though there has not been an explicit effort by FS personnel to manage in conformance with this Principle. The exception to this statement are stands meeting the FSC definition of Type 1 and 2 old growth and that have been or are being scheduled for regeneration harvests. In fact, it is possible that a main assessment will lead to a finding of major non-conformance to P9 because of old growth harvesting. To demonstrate adequate conformance, during a full evaluation, Mt. Hood managers should develop a written “cross walk” that demonstrates how the extant planning procedures and any other similar initiatives cover the HCVF analysis obligations contained in this Principle. Particular attention should be paid to the requirements for stakeholder consultation in the process of defining, identifying and developing prescriptions for the management of HCVF areas.</p>
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## **FINAL COMMENTS**

We would like to express our appreciation to the group of Forest Service employees attached to the Mt. Hood National Forest that interacted with the FSC and SFI lead auditors over the 2-day evaluation, but particularly to Nancy Lankford and Lisa Norris for their central role in planning for and helping to manage the evaluation process. The auditors found the interactions with all staff to be highly professional and effective in acquiring an initial understanding of the breadth and complexity of management programs and activities on the Mt. Hood. We are very impressed with the positive attitudes and stewardship ethic displayed by all employees with whom we interacted. The “negative” comments contained in this report should by no means be construed as an indictment of the Forest Service’s management of the Mt. Hood and the sometimes daunting job it is doing of managing a national forest unit that is subject to growing and oftentimes conflicting demands from the “public,” broadly defined. Our responsibility is to identify and discuss those aspects of a forest management operation that may not presently dove-tail well with requirements for certification under the Forest Stewardship Council. We believe that FSC-endorsed certification, were the Forest Service to pursue it on the Mt. Hood National Forest and were the FSC to allow national forest units to engage in a bona fide certification project, is reasonably within the realm of attainability particularly if the question of timber management in stands meeting the FSC definition of old growth can be appropriately sorted out. Of course, the simulated full evaluation, scheduled to take place in late September, will provide a much more definitive set of assessments as to just how well-positioned the Mt. Hood is to achieve FSC certification. Given our experiences during this scoping visit, we look forward to the next stages of this pilot project.

## APPENDIX 1: AUDIT TEAM

### SCS Lead Auditor, Robert Hrubes

Robert Hrubes is Senior Vice-President of Scientific Certification Systems. In that capacity, Dr. Hrubes is responsible for all natural resource and recycled content certification activities of the company. While providing senior leadership of these programs, Dr. Hrubes remains an active certification practitioner. He continues to lead certification evaluation teams throughout the world as well as represent both SCS and FSC and numerous public fora. He is internationally recognized as a leading authority and practitioner of third-party forest management certification.

Prior to assuming his present duties at SCS in 2000, Dr. Hrubes owned and managed, for 6 years, a forestry and natural resource economics consultancy based in northern California. During those years, he served on the founding Board of Directors of the Forest Stewardship Council. Additionally, he served as the founding Chair, Board of Directors of the Forest Stewards Guild, a U.S.-based professional society of progressively minded practicing foresters. Previous to the creation of his own consultancy, Dr. Hrubes was for 6 years a managing principal of LSA Associates, Inc., a California-based environmental consulting firm. And prior to that, Dr. Hrubes was employed for 14 years by the USDA Forest Service in a variety of positions from field forester to research economist, operations research analyst and acting Group Leader for Land Management Planning.

Dr. Hrubes holds the following degrees:

Ph.D., Forest Economics, UC-Berkeley

M.A., Economics, UC-Berkeley

M.S., Resource Systems Management, Univ. of Michigan, Ann Arbor

B.S., Forest Management, Iowa State University, Ames

### NSF-ISR Lead Auditor, Mike Ferrucci

Mike Ferrucci is the SFI Program Manager for NSF – International Strategic Registrations and is responsible for all aspects of the firm’s SFI Certification programs. Mike has led Sustainable Forest Initiative (SFI) certification and pre-certification reviews throughout the United States. He has also led joint SFI and Forest Stewardship Council (FSC) certifications in Wisconsin, Maryland, Maine and Connecticut and scoping or pre-certification gap-analysis project throughout the United States. He is qualified as a RAB EMS Lead Auditor (ISO 14001 Environmental Management Systems), as a SFI Lead Auditor, as a FSC Team Leader, and as a Tree Farm Group Certification Lead Auditor.

Mike has conducted or participated in assessments of forest management operations throughout the United States, with field experience in Maine, New Hampshire, New York, Massachusetts, Connecticut, New Jersey, Maryland, West Virginia, Tennessee, Minnesota, Michigan, Wisconsin, Arizona, California, Oregon, and Washington. Mike is a 26-year member of the Society of American Foresters. He is also active in the Association of Consulting Foresters and the Connecticut, Massachusetts, and Rhode Island SIC for the Sustainable Forestry Initiative.

Mike has 26 years of forest management experience. His expertise is in sustainable forest management planning; in certification and verification of forests as sustainably managed; in the application of easements for large-scale working forests, and in the ecology, silviculture, and management of mixed species forests, with an emphasis on regeneration and management of native hardwood species.

Mike is a founding partner and President of Interforest, LLC where he is responsible for the assembly and management of integrated teams of scientists and professional managers to solve complex forestry problems. Mike is also a Lecturer at the Yale School of Forestry and Environmental Studies, where he teaches courses and workshops in forest management, operations, professional forest ethics, private forestry, and financial analysis to graduate students.