



**NSF International Strategic Registrations, Ltd.**

October 18, 2007

Gary Larson, Forest Supervisor  
Mt. Hood National Forest Mt. Hood National Forest  
Sandy, OR

Re: SFI Assessment Report for the Mt. Hood National Forest

Dear Mr. Larson:

NSF-ISR has completed the report of the certification pilot study of Mt. Hood National Forest's SFI program. As you know, a team of foresters and biologists visited the forest September 18 through September 22, 2006. The team assessed conformance of the forest against both FSC and SFI requirements for forest certification. A draft was provided in November, 2006; your team provided comments/edits on the report. I now provide the final version.

This final report incorporates the majority of the comments from you and your staff. One change I did not make was the suggestion to classify the SFI-specific requirements as "Not Applicable". I don't agree with this approach because I feel it could lead to confusion; these requirements would be applicable to any landowner seeking SFI Certification. The Forest Service view that these requirements may not be applicable to this Pilot Study is understandable, but I have chosen to list these items as gaps.

As you may recall, our audit team found that the Mt. Hood National Forest meets most of the 2005-2009 Sustainable Forestry Initiative Standard® (SFI) requirements, but still has major gaps in its program relative to the standard. We also found many requirements that the forest clearly exceeds, and several areas where the team identified opportunities for improvement. The detailed findings are presented in the attached draft report.

Because the Mt. Hood National Forest has not formally applied for "SFI Program Participant" status most of the gaps or non-conformances involve SFI-specific items. These can not be resolved without a formal commitment to the SFI standard. Three significant gaps involved forest management practices beyond SFI-oriented approaches, relating to harvest levels, forest health, and road maintenance and decommissioning.

The detailed findings can be viewed in the "Audit Matrix" starting on page 70 (requirements and category of finding) and on page 84 (description of evidence and rationale for findings). In this table the term gap should be considered to be equivalent to a finding of non-conformance in an

Certification Dual Assessment Case Study – Mount Hood National Forest

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official certification audit.

If this were a formal certification NSF would have issued Corrective Action Requests (CARs) and your team would have been granted time to determine the causes of the “gaps” and devise plans to address them. However our proposal for this pilot project specified that we would not issue formal CARs. Further, the short time between the readiness review/scoping visit and the certification audit visit (four weeks) made it difficult to resolve these issues even if that was an objective.

It has been a great pleasure to work with you and with your fine staff on this innovative project.

Sincerely yours,



Mike Ferrucci, Lead Auditor  
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cc: Petie Davis, NSF-ISR Audit Program Manager

Enclosure: Final SFIS Certification Pilot Audit Report

# **CERTIFICATION EVALUATION REPORT**

## **SUSTAINABLE FORESTRY INITIATIVE® STANDARD**



### **Mt. Hood National Forest**

**Evaluation: September 18-22, 2006**  
**November 30, 2006**

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# SFI Certification Assessment Findings Summary

An assessment of the Mt. Hood National Forest against the requirements of the 2005-2009 Sustainable Forestry Initiative Standard® (SFIS) was conducted as part of a pilot test of forest certification being conducted by the USDA Forest Service and the Pinchot Institute. A seven-person audit team reviewed documentation, interviewed forest service staff and external stakeholders, and visited portions of the forest in August and September, 2006. The audit team found that the Mt. Hood National Forest meets most of the 2005-2009 Sustainable Forestry Initiative Standard® (SFI) requirements, but has major gaps in its program relative to the standard. There are many requirements that the forest clearly exceeds, and several areas where opportunities for improvement were identified. The detailed findings are presented in the following report.

The SFIS incorporates three tiers of requirements, listed in the audit matrix found at Attachment 3 in the Appendix (page 70). The top tier consists of 13 objectives comprising the fundamental goals of sustainable forest management. Certification is assessed against the requirements of the middle and lower tiers, termed Performance Measures and Indicators. Performance Measure are designed to be means of judging whether the Objectives are fulfilled, and Indicators are specific metrics providing information about an organization's forestry and environmental performance.

The Sustainable Forestry Initiative Standard was written to apply to all types of forestry organizations throughout the United States and Canada. As such, not all of the provisions of the standard would be expected to apply to all organizations. Some of the requirements were found to not apply and are so indicated in the audit results matrix.

Each applicable SFI requirement was assessed by the audit team, with one or more of the following potential findings:

- Exceeds the Requirements: The requirement is clearly exceeded.
- Full Conformance: The requirement is met.
- Opportunity for Improvement: Although the requirement is met, there are opportunities to improve in this area
- Minor Gap: An isolated lapse in SFIS program implementation which does not indicate a systematic failure to consistently meet an SFI objective, performance measure or indicator.
- Major Gap: One or more of the SFIS performance measures or indicators has not been addressed or has not been implemented to the extent that a systematic failure of the SFI system to meet an SFI objective, performance measure or indicator occurs.

The evaluation matrix provides a description of evidence reviewed and findings for all applicable requirements.

The Mt. Hood National Forest was judged by the audit team to be in full conformance with the majority of applicable requirements. Further, the Forest was found to exceed the requirements in the following areas:

- Indicator 2.1.3 - Minimized plantings of exotic trees:

The Mt. Hood National Forest does not plant exotic species.

- Indicators 4.1.2 and 4.1.3 – Protection of threatened and endangered species;  
Plans to locate and protect known sites associated with viable occurrences of critically imperilled and imperilled species and communities:  
Protections for threatened and endangered species are exceptional. The Forest Service goes well beyond protection of known sites to devote considerable resources to expanding information about threatened, endangered, sensitive, and candidate species and communities with local, regional or national importance.
- Indicator 4.1.4 – Protection of stand-level wildlife habitat elements:  
The Forest Service has developed and implemented provisions for an impressive array of stand-level habitat elements including coarse woody debris, green trees, snags, old-growth fragments, and sites used as bat roosts.
- Indicator 4.1.5 - Assessment of forest cover types and habitats at the individual ownership level and, where credible data are available, across the landscape, and incorporation of findings into planning and management activities:  
The Northwest Forest Plan provides a sterling example of such landscape-scale planning.
- Indicator 4.1.6 - Plans or programs for the conservation of old-growth forests:  
Old growth protections are a significant driver of the Northwest Forest Plan. Further, standards and guidelines for protection of old growth are also contained in the Mt. Hood National Forest Plan.
- Indicator 4.1.7 - Activities as appropriate to limit the introduction, impact, and spread of invasive exotic plants and animals:  
Plans are being developed (with some implementation underway) for comprehensive and site-specific invasive plant treatments on a large portion of problem areas on the Forest.
- Objective 6 - Management of lands that are ecologically, geologically, historically, or culturally important in a manner that recognizes their special qualities:  
Efforts to manage and protect special sites and lands are exemplary.
- Performance Measure 12.1 - Support of efforts by other landowner organizations or programs to apply principles of sustainable forest management:  
The Forest Service, through its State and Private Forestry Program is a leader in these efforts, and Mt. Hood National Forest personnel contribute to these efforts on the Forest and within their communities.
- Indicator 12.2.3 - Recreation opportunities for the public, where consistent with forest management objectives:  
Recreation has a high emphasis within the Mt. Hood National Forest, going well beyond requirements to merely allow recreation if it doesn't interfere with forest management objectives to attain the status of an important regional and national recreation attraction.
- Performance Measure 12.3 - Participation in the development of public land planning and management processes:  
The Mt. Hood National Forest has impressive outreach efforts for all land management decisions, including many exemplary collaborations with citizen groups. This Forest is an outstanding model for successful public involvement.

- Indicator 13.1.1 – System to review commitments, programs, and procedures to evaluate effectiveness:  
Mt. Hood National Forest has a robust, comprehensive, and effective monitoring program.

Four Opportunities for Improvement were noted:

- Indicator 2.3.5 - Retention of vigorous trees during partial harvesting:  
There is an opportunity to improve the protection of residual trees during partial harvests.
- Indicator 3.1.1- Program to implement Best Management Practices (BMPs) during all phases of management activities:  
There is an opportunity to improve in the regular implementation of road grading.
- Indicator 4.1.8- Program to incorporate the role of prescribed or natural fire:  
There is an opportunity to improve by increasing the use of prescribed fire.
- Performance Measure 12.4 - Program Participants ... shall confer with affected indigenous peoples:  
There is an opportunity to improve by exploring opportunities for contacting a broader range of tribes than currently consulted.

There were no Minor Gaps identified. All identified gaps were judged to be major, in large measure because they are systematic and not isolated.

Thirteen SFI requirements were judged to be not addressed or implemented at the level of a Major Gap. These Major Gaps fell into eight broad categories:

1. Harvest levels
2. Road maintenance and decommissioning
3. Forest health
4. Oregon SFI Implementation Committee
5. SFI-specific roles and responsibilities and commitment
6. Contractor qualifications requirements
7. SFI-specific reporting
8. Management system and management review

### **Harvest Levels - Performance Measure 1.1**

Ample evidence was provided that the harvest levels are well below planned levels. In addition to the harmful economic effects, delays in implementing needed treatments are having ecological impacts including reduced tree vigor and lost opportunities to implement habitat improvements.

### **Road Maintenance and Decommissioning – Indicator 2.3.7**

The current road system does not match management needs, as it was designed for a time when timber harvest levels were nearly ten times current levels. Many existing roads are not needed

because of changed management direction. Road maintenance funding is not adequate to maintain the current transportation system, and there are clear signs that the road system is starting to suffer from lack of funds for regular grading, ditch maintenance, or upgrades.

### **Forest Health – Performance Measure 2.4, Indicator 2.4.2**

Many of the stands in the forest are overstocked, leading to high risk of uncharacteristically severe, stand-replacing wildfire or insect infestation. The audit team was not provided convincing evidence of a plan (including a timeline and resources needed) to address this overstocking and restore forest health. The “National Fire Plan” (see <http://www.fireplan.gov/>) is partially responsive, although not specific to the Mt. Hood National Forest.

### **Oregon SFI Implementation Committee – Indicators 10.2.1, 12.1.1, 12.2.1, 12.5.1**

These indicators involve SFI-specific activities that would be expected to occur in concert with the SFI Implementation Committee. The Mt. Hood National Forest has not committed to the SFI Program and employees are not involved in supporting the efforts of the Oregon SIC at this time.

### **SFI Commitment and SFI-Specific Roles and Responsibilities – Indicators 10.1.1 & 10.1.2**

There has been no commitment to the SFI Standard. Land managers and specialists have not received specific assignments for implementation of SFI requirements.

### **Contractor Qualifications – Indicator 10.1.4**

There is no skill, training, or experience requirement for timber harvesters, directly required by the Forest Service.

### **SFI-Specific Reporting – Performance Measure 12.6, 12.6.1**

Mt. Hood National Forest and the Forest Service are not currently SFI Program Participants and thus do not participate in the SFI survey nor report annual to the SFI Program on compliance with the standard.

### **Management System and Management Review – Performance Measure 13.1**

Mt. Hood National Forest is not currently a SFI Program Participant, and thus has not developed a system for reviewing SFI-specific requirements, reporting information to management regarding progress in achieving SFI Standard objectives and performance measures, or to assess changes and improvements necessary to continually improve their SFI Program.

Additional details for all findings (for each applicable SFI requirement) are provided in the evaluation matrix starting on page 70.

Beyond these core findings against the 2005-2009 Sustainable Forestry Initiative Standard® requirements, the team found a very professional, dedicated, and creative staff striving to manage a diverse forest under a complex and shifting mandate for a public demanding results that include often incompatible goals. Thanks to its dedicated staff, the Mt. Hood National Forest is often a leader in using new programs (stewardship contracting) or existing authorities (concessionaires) in creative ways to conserve, protect, and manage the forest and all of its

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resources and benefits. The public servants employed here are to be commended for the fine results of long-term management in this incomparable forest.

## Implications

Most of the major gaps in conformance with the 2005-2009 Sustainable Forestry Initiative Standard® relate to “SFI-specific” requirements. These include, for example, not having a statement of commitment to the SFIS, not having assigned SFI roles and responsibilities, not supporting the efforts of the SFI Implementation Committees, not filling out the SFI Annual Progress Report, and not conducting an annual management review of the effectiveness of the SFI Program. Interested parties within and outside of the Forest Service believe that these gaps could be easily addressed should the Forest Service decide to seek SFI certification, and the Lead Auditor concurs. These SFI-specific issues could have been considered to be “Not Applicable” for purposed of the evaluation, but will have to be addressed if SFI Certification is sought.

The management system requirements (Performance Measure 13.1, all three indicators) focus on SFI-specific aspects of management review. These requirements have a strong relationship to the Environmental Management Systems (EMS) being developed for all Forest Service units in coordination with all new management plans.

The contractor qualifications requirements (see Indicator 10.1.4) are not met with existing bid specifications. In other public lands certification projects the logging and forestry community was generally quite supportive of skills-training requirements for logging contractors.

The most significant findings are the major gaps relating to harvest levels, forest health, and roads. The audit team considered a wide range of evidence and consulted various stakeholders in reaching these conclusions, which are all linked. Difficulties in attaining desired harvest levels are affecting the ability to manage for healthy forest conditions. A lack of consensus on the proper role of the national forests is a major contributing factor. The current road system is a legacy from an era when the national forests were viewed primarily as sources of wood fiber. The reaction to the excesses of that era has been complex planning and administrative rules that are subject to regular and often disruptive court action.

The Forest Service is well aware of challenges regarding forest health, harvest levels, and road maintenance. Numerous studies and initiatives attempt to address the causes and to provide solutions. Although significant and high-quality efforts are being made on this Forest, the audit team does not feel that management practices being implemented at this time are sufficient to meet the SFI requirements. Two reasons were paramount in reaching these conclusions. First, the array of documents provided did not include a plan with priorities, timelines, and budgets for addressing the identified issues. Second, those documents that address the issues are not specific to the Mt. Hood National Forest, but instead covered larger areas, generally relating to all western forests managed by the Forest Service.

At the forest level there is no clear plan with a timeline to meet the needs for healthy forest conditions, planned harvest levels, or a properly-functioning road system. Projects are proposed (and often implemented, provided they survive the many legal challenges) that will advance forest goals and provide movement towards closing these gaps. However these projects are destined to come up short, because staff and funding are not based on forest-level needs, but on top-down funding decisions. In short, although local staff are capable of, and are doing, superb

work, the continued difficult legal climate and reduced resources result in a program that does not meet the SFI requirements for certification as sustainable.

## Project Background

The assessment of the Mt. Hood National Forest was conducted as part of a pilot test of forest certification being conducted by the Forest Service and the Pinchot Institute. The goal of the study is to *“explore what could be learned from testing third party auditing to both SFI and FSC standards and help the agency determine what policy and management changes might be needed if the Forest Service elects to pursue third party certification to externally developed standards of its national forests and grasslands.”*<sup>1</sup>

Actual certification of national forests is not part of the project, and is not an expected outcome. Current Forest Service policy is to not seek certification for Forest Service lands. The Forest Service, since 2000, has been interested in exploring the value of independent, third party environmental audits. Since then, the use of EMS approaches has become an official policy of the Forest Service, and are required as part of the new planning rule.<sup>2</sup>

The 2005-2009 Sustainable Forestry Initiative Standard® is one of two certification standards being tested in the project. The Forest Stewardship Council Pacific Regional Standard is the other. For both standards the assessment is being conducted using regular methods, replicating an actual assessment as closely as possible.

### **Mt. Hood National Forest**

Considerable information regarding the Mt. Hood National Forest, the certification assessment test projects, and forest certification

#### **FOREST CERTIFICATION: Background on the National Forest Certification Case Studies**

(source: Pinchot Institute web site 11.05.05, [http://www.pinchot.org/certification/national\\_forest.htm#what](http://www.pinchot.org/certification/national_forest.htm#what) )

The National Forest Certification Case Studies will compare current land and resource management activities on national forests with the requirements of the two major forest certification programs now operating in the U.S. While the overall effort will be coordinated by the Pinchot Institute, the comparison will involve independent auditing firms. These firms will be contracted to carry out actual certification assessments, emulating a process that would be used for landowners actually seeking certification.

**Five case** study areas in the National Forest System have been chosen. In total, the seven case study areas include portions of ten national forests: the entirety of five forests, three forests managed under one plan as the Florida National Forests, and a special unit that includes portions of the Winema and Fremont National Forests. The case study areas are the:

- [Allegheny National Forest](#) (PA)
- [Chequamegon-Nicolet National Forest](#) (WI)
- [Mt. Hood National Forest](#) (OR)
- National Forests in Florida (FL)
- [Lakeview Federal Stewardship Unit on the Fremont-Winema National Forest](#) (OR)

The Forest Service selected these study areas based on several criteria, including stakeholder inquiries about certification and the readiness and interest of forest management staff. Also, it is important that the study areas represent diverse geographical, socio-political, economic and ecological settings.

<sup>1</sup> Forest Certification Fact Sheets, USDA Forest Service Forest Certification Test Project, <http://www.fs.fed.us/news/2005/releases/08/factsheets.pdf> 11.05.05

<sup>2</sup> “Forest Service ISO ... will require independent third party certification to standards developed through the forest planning process with public involvement. The key difference is the source of the standards.”

in general is available on the following web sites:

<http://www.fs.fed.us/r6/mthood/> Mt. Hood National Forest home page

<http://www.fs.fed.us/r6/mthood/projects/> focus on particular projects on the forest

<http://www.fs.fed.us/r6/mthood/projects/certification/index.shtml> Certification Project Site

The latter of these sites contains information describing the Mt. Hood National Forest and was used to provide evidence of conformance in a format easily accessible to the audit team and available to any interested party.

One section of the Forest's web site provides a good description of the Forest as provided below.

#### **The Mt. Hood National Forest**

Located twenty miles east of the city of Portland, Oregon, and the northern Willamette River valley, the Mt. Hood National Forest extends south from the strikingly beautiful Columbia River Gorge across more than sixty miles of forested mountains, lakes and streams to Olallie Scenic Area, a high lake basin under the slopes of Mt. Jefferson. The Forest encompasses some 1,067,043 acres.

Our many visitors enjoy fishing, camping, boating and hiking in the summer, hunting in the fall, and skiing and other snow sports in the winter. Berry-picking and mushroom collection are popular, and for many area residents, a trip in December to cut the family's Christmas tree is a long standing tradition.

The Cascade Range Forest Reserve was established in 1893, and divided into several National Forests in 1908, when the northern portion was merged with the Bull Run Reserve (city watershed) and named Oregon National Forest. The name was changed again to Mt. Hood National Forest in 1924.

Some popular destinations that offer rewarding visits are Timberline Lodge, built in 1937 high on Mt. Hood, Lost Lake, Trillium Lake, Timothy Lake, Rock Creek Reservoir and portions of the Old Oregon Trail, including Barlow Road.

There are 189,200 acres of designated wilderness on the Forest. The largest is the Mt. Hood Wilderness, which includes the mountain's peak and upper slopes. Others are Badger Creek, Salmon-Huckleberry, Hatfield, and Bull-of-the-Woods. Olallie Scenic Area is a lightly-roaded lake basin that provides a primitive recreational experience.

(source: <http://www.fs.fed.us/r6/mthood/about/> )

### **SFI Standard**

The 2005-2009 Sustainable Forestry Initiative Standard®<sup>3</sup> consists of a tiered array of Principles, Objectives, Performance Measures, and Indicators that collectively comprise an approach to forestry that is sustainable. Organizations or individuals that manage forestland or procure wood for use in the manufacture of forest products can subscribe to this voluntary standard in order to demonstrate a commitment to forestry programs that are economically viable, environmentally appropriate, and socially acceptable. Program Participants must follow

<sup>3</sup> For a complete copy of the SFI Standard go to <http://www.abouthfb.org/sfiprogram.cfm> and download the PDF document at <http://www.abouthfb.org/generalPDFs/SFBStandard2005-2009.pdf> .

these standards, and can choose to undergo a third-party certification against the standards to further demonstrate their commitment to following good practices.

The SFI Principles (listed below) describe the overall approach to sustainable forestry that is embedded in all SFI requirements. Certification audits focus on the applicable Objectives, Performance Measures, and Indicators. Objectives are the broad categories of issues considered in SFI certification. In cases like the Mt. Hood National Forest where only land management is involved Objectives 1-7 and 9-13 apply. The actual metrics are found in the indicators. For this project 79 SFI Indicators organized under 26 SFI Performance Measures were deemed relevant.

## **SFI Principles**

### **1. Sustainable Forestry**

To practice sustainable forestry to meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing, and harvesting of trees for useful products with the conservation of soil, air and water quality, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics.

### **2. Responsible Practices**

To use and to promote among other forest landowners sustainable forestry practices that are both scientifically credible and economically, environmentally, & socially responsible.

### **3. Reforestation and Productive Capacity**

To provide for regeneration after harvest and maintain the productive capacity of the forestland base.

### **4. Forest Health and Productivity**

To protect forests from uncharacteristic and economically or environmentally undesirable wildfire, pests, diseases, and other damaging agents and thus maintain and improve long-term forest health and productivity.

### **5. Long-Term Forest and Soil Productivity**

To protect and maintain long-term forest and soil productivity.

### **6. Protection of Water Resources**

To protect water bodies and riparian zones.

### **7. Protection of Special Sites and Biological Diversity**

To manage forests and lands of special significance (biologically, geologically, historically or culturally important) in a manner that takes into account their unique qualities and to promote a diversity of wildlife habitats, forest types, & ecological or natural community types.

### **8. Legal Compliance**

To comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations.

### **9. Continual Improvement**

To continually improve the practice of forest management and also to monitor, measure and report performance in achieving the commitment to sustainable forestry.

*Source: Sustainable Forestry Initiative® (SFI) Standard, 2005–2009 Edition*

## Methods Used for Pilot Study

The goal of the pilot study, to “*explore what could be learned from testing third party auditing to both SFI and FSC standards and help the agency determine what policy and management changes might be needed if the Forest Service elects to pursue third party certification to externally developed standards of its national forests and grasslands.*”<sup>4</sup>, was best achieved by conducting the study as similarly as possible as an official SFI certification. Thus NSF employed its SFI Standard Operating Procedures and utilized an approved lead auditor and audit team members who meet the SFI requirements. Brief bios for the audit team members are found in the audit plan, which is Attachment 2 of this report.

Throughout the pilot study all certification activities were conducted as closely as possible to an actual certification project. Some normal SFI certification processes could not be followed however. Because the Forest Service has not made a decision to become SFI certified and has not become an SFI Program Participant, there are some requirements that could not be met, including responding to annual surveys from the Sustainable Forestry Board on forestry practices. Further, the Forest Service has not become involved with the Oregon SFI Implementation Committee, which is associated with several SFI requirements. Thus there were numerous SFI requirements that could not have been met by the Mt. Hood National Forest for structural reasons. These issues will have to be addressed if SFI Certification is sought.

Perhaps most significantly, the Corrective Action Request process was not utilized completely. Formal SFI certification includes an iterative series of visits by auditors to determine conformance with all of the requirements. The first visit is called a “readiness review” and the next visit is the certification audit. If certification is granted then follow-up visits called surveillance audits would occur, normally at least annually. Significant gaps discovered during the readiness review would normally be addressed before the certification audit was conducted. In this pilot study the SFI gaps found in the readiness phase were not addressed. The certification audit phase was conducted despite this, in accordance with the pilot study methodology.

As part of a standard SFI audit when gaps (termed non-conformances in an official audit) are found the Lead Auditor issues a Corrective Action Request describing the gap and providing a template for response. The response from the Program Participant would then include an explanation of the reason for the non-conformance, a plan to correct it, and a plan to prevent it from reoccurring. This three-part response is termed a “Corrective Action Plan”. For the pilot study there was no expectation that non-conformances discovered during the readiness review or during the certification audit would be addressed by the Mt. Hood National Forest. Thus there were no formal corrective action plans developed or reviewed.

SFI Certification is awarded after all Major Non-conformances are corrected (plans are implemented) and approved by the Lead Auditor, and after plans for all Minor Non-conformances are approved by the Lead Auditor. As noted above, during this pilot study non-conformances were identified by the audit team but no effort was made by the Forest Service to remedy the gaps. Thus even if certification was sought (it was not) it could not be awarded.

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<sup>4</sup> Forest Certification Fact Sheets, USDA Forest Service Forest Certification Test Project, <http://www.fs.fed.us/news/2005/releases/08/factsheets.pdf> 11.05.05

## Assessment Itinerary and Participants

The project began with a Readiness Review conducted on August 22-23, 2006. Readiness Review findings are generally focused on the adequacy of documentation and existence of programs for each relevant Performance Measure. The goal of an SFI readiness review is to ensure that the organization seeking certification understands the standard and has adequate program substance to justify the cost and expense of a full SFI Certification Audit. The review process is designed to identify gaps in programs or documentation rather than determining actual conformance with the requirements. The results of this initial phase were provided in a report to the Forest Service which is provided as Attachment 1.

In conjunction with the readiness review phase a formal Certification Audit Plan was developed to guide the implementation of the September, 2006 pilot certification audit (provided as Attachment 2). This plan was modified during the audit to respond to opportunities and identified needs, as is typical of all audits. The actual audit activities are summarized in a description of the itinerary which follows below<sup>5</sup>. The participating personnel are listed following the description of each day's activities.

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 Mt. Hood National Forest (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 Mt. Hood National Forest. 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 Mt. Hood National Forest's level of conformance to the 2005-2009 Sustainable Forestry Initiative Standard®.

### **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

<sup>5</sup> This itinerary section was prepared by Sterling Griffin of Scientific Certification Services, which support on this and other audit tasks was greatly appreciated. The same information is provided in the FSC report.

Please see FSC report 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 National Environmental Policy Act [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 (RD)*

**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  
John Tullis  
Petr Kakes  
Steve Lenius  
Steve Wilent  
Susan Corwin

#### **Affiliation**

Executive Director – Bark  
Community member, Log Scaler  
Volunteer – Bark  
Community member, Engineer  
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

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 Certification Dual Assessment Case Study – Mount Hood National Forest
 

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Jennie O'Connor  
Sharon Hernandez  
Doug MacCleery

Robert Bergamini  
Nancy Lankford

Glenda Goodwyne  
Burnham Chamberlain

Gwen Collier  
Andrei Rykoff

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

- Introductions and overview of the certification pilot study process – Ferrucci and Hrubec
- 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 wind throw 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, Rykoff

Visited Old Lemiti thinning project, areas of mountain pine beetle epidemic, and a Hazard Management Project with The Confederated Tribes of Warm Springs (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	Nancy Lankford	Roy Shelby	Ray Weiss	Dan Fissel
Rich Thurman	Doug MacCleery	Daina Bambe	Darcy Morgan	Jim Rice
Kevin Slagle	Cheryl Sonnabend	Chris Rossel	Michael Dryden	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 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 & Barlow Ranger Districts precommercial thin 200-900 acres per year, depending on 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 2005-2009 Sustainable Forestry Initiative Standard®.

### **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	

## **Attachments**

Attachment 1: Readiness Review Report

Attachment 2: Evaluation Plan

Attachment 3: Evaluation Matrix

Certification Dual Assessment Case Study – Mount Hood National Forest

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## **Attachment 1**

# **READINESS REVIEW REPORT**

## **SUSTAINABLE FORESTRY INITIATIVE® STANDARD**



**Mt. Hood National Forest**

FRS: 8Y581

**Evaluation: August 22 – 23, 2006**

**NSF International Strategic Registrations, Ltd.**

**789 North Dixboro Road**

**Ann Arbor, MI 48105**

**888-NSF-9000**

**[www.nsf-isr.org](http://www.nsf-isr.org)**



September 7, 2006

Nancy Lankford, Silviculturist  
Mt. Hood National Forest  
Sandy, OR

Re: Draft Readiness Review Report and Preliminary Audit Plan

Dear Ms. Lankford,

NSF-ISR has completed the Readiness Review of Mt. Hood National Forest's programs and has found that the Mt. Hood National Forest has several gaps in relative to the 2005-2009 Sustainable Forestry Initiative Standard®. If this were not a pilot project we would recommend that you fill all of these gaps before proceeding. Instead, the agreed-upon approach is to proceed with the second phase of the Dual Assessment Case Study involving a certification visit by a full team of auditors. Thus we made plans for the Pilot Joint SFIS Certification Audit / FSC Assessment now scheduled for Monday September 18 through Friday September 22, 2006.

During our Readiness Review visit we reviewed your management program against the SFI Standard. The results are provided in the "Readiness Review Summary Sheet" provided as Attachment 1. In addition, I have entered some preliminary findings in the "SFI Audit Matrix" document (provided separately as a tool to help your staff prepare) that will form the bulk of the final report to be provided after the September visit. Because the Mt. Hood National Forest has not signed on as an SFI Program Participant most of the gaps involve SFI-specific items, which can not be resolved without a formal commitment to the SFI standard. In this report I have listed these as "gaps" and have not issued formal "non-conformances" or CARs. If you have any questions regarding these gaps please feel free to call me at 203-887-9238.

The Preliminary Draft Audit Plan for the upcoming audit is included, describing the schedule and conduct of the SFIS Certification Audit. Please review and confirm the details contained in the Audit Plan, preferably by September 12, 2006.

Sincerely yours,

A handwritten signature in black ink that reads "Mike Ferrucci". The signature is written in a cursive, flowing style.

Mike Ferrucci, Lead Auditor

Enclosure: Readiness Review Report and Certification Audit Plan

cc: Petie Davis, NSF-ISR Audit Program Manager  
Robert Hrubes, Dave Wager, Andrea

## Certification Dual Assessment Case Study for the Mt. Hood National Forest

### Project Background

The assessment of the Mt. Hood National Forest was conducted as part of a pilot test of forest certification being conducted by the Forest Service and the Pinchot Institute. The goal of the study is to *“explore what could be learned from testing third party auditing to both SFI and FSC standards and help the agency determine what policy and management changes might be needed if the Forest Service elects to pursue third party certification to externally developed standards of its national forests and grasslands.”*<sup>6</sup>

Actual certification of national forests is not part of the project, and is not an expected outcome. Current Forest Service policy is to not seek certification for Forest Service lands. The Forest Service, since 2000, has been interested in exploring the value of independent, third party environmental audits. Since then, the use of EMS approaches has become an official policy of the Forest Service, and are required as part of the new planning rule.<sup>7</sup>

The 2005-2009 Sustainable Forestry Initiative Standard® is one of two certification standards being tested in the project. The Forest Stewardship Council Pacific Regional Standard is the other. For both standards the assessment is being conducted using regular methods, replicating an actual assessment as closely as possible. This document reports on the findings of the first phase of the SFI portion of the project, deemed an SFI Readiness Review.

### Mt. Hood National Forest

Considerable information regarding the Mt. Hood National Forest, the certification assessment test projects, and forest certification in general is available on the following web sites:

#### FOREST CERTIFICATION: Background on the National Forest Certification Case Studies

(source: Pinchot Institute web site 11.05.05, [http://www.pinchot.org/certification/national\\_forest.htm#what](http://www.pinchot.org/certification/national_forest.htm#what) )

The National Forest Certification Case Studies will compare current land and resource management activities on national forests with the requirements of the two major forest certification programs now operating in the U.S. While the overall effort will be coordinated by the Pinchot Institute, the comparison will involve independent auditing firms. These firms will be contracted to carry out actual certification assessments, emulating a process that would be used for landowners actually seeking certification.

Seven case study areas in the National Forest System have been chosen. In total, the seven case study areas include portions of ten national forests: the entirety of five forests, three forests managed under one plan as the Florida National Forests, and a special unit that includes portions of the Winema and Fremont National Forests. The case study areas are the:

- [Allegheny National Forest](#) (PA)
- [Chequamegon-Nicolet National Forest](#) (WI)
- [Medicine Bow National Forest](#) (WY)
- [Mt. Hood National Forest](#) (OR)
- [Siuslaw National Forest](#) (OR)
- National Forests in Florida (FL)
- [Lakeview Federal Stewardship Unit on the Fremont-Winema National Forest](#) (OR)

The Forest Service selected these study areas based on several criteria, including stakeholder inquiries about certification and the readiness and interest of forest management staff. Also, it is important that the study areas represent diverse geographical, socio-political, economic and ecological settings.

<sup>6</sup> Forest Certification Fact Sheets, USDA Forest Service Forest Certification Test Project, <http://www.fs.fed.us/news/2005/releases/08/factsheets.pdf> 11.05.05

<sup>7</sup> “Forest Service ISO ... will require independent third party certification to standards developed through the forest planning process with public involvement. The key difference is the source of the standards.”

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 Certification Dual Assessment Case Study - Mt. Hood National Forest
 

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<http://www.fs.fed.us/r6/mthood/> Mt. Hood National Forest home page

<http://www.fs.fed.us/r6/mthood/projects/> focus on particular projects on the forest

<http://www.fs.fed.us/r6/mthood/projects/certification/index.shtml> Certification Project Site

The latter of these sites contains information describing the Mt. Hood National Forest and will be used to provide evidence of conformance in a format easily accessible to the audit team and available to any interested party.

One section of the Forest's web site provides a good description of the Forest as provided below.

**The Mt. Hood National Forest**

Located twenty miles east of the city of Portland, Oregon, and the northern Willamette River valley, the Mt. Hood National Forest extends south from the strikingly beautiful Columbia River Gorge across more than sixty miles of forested mountains, lakes and streams to Olallie Scenic Area, a high lake basin under the slopes of Mt. Jefferson. The Forest encompasses some 1,067,043 acres.

Our many visitors enjoy fishing, camping, boating and hiking in the summer, hunting in the fall, and skiing and other snow sports in the winter. Berry-picking and mushroom collection are popular, and for many area residents, a trip in December to cut the family's Christmas tree is a long standing tradition.

The Cascade Range Forest Reserve was established in 1893, and divided into several National Forests in 1908, when the northern portion was merged with the Bull Run Reserve (city watershed) and named Oregon National Forest. The name was changed again to Mt. Hood National Forest in 1924.

Some popular destinations that offer rewarding visits are Timberline Lodge, built in 1937 high on Mt. Hood, Lost Lake, Trillium Lake, Timothy Lake, Rock Creek Reservoir and portions of the Old Oregon Trail, including Barlow Road.

There are 189,200 acres of designated wilderness on the Forest. The largest is the Mt. Hood Wilderness, which includes the mountain's peak and upper slopes. Others are Badger Creek, Salmon-Huckleberry, Hatfield, and Bull-of-the-Woods. Olallie Scenic Area is a lightly-roaded lake basin that provides a primitive recreational experience.

(source: <http://www.fs.fed.us/r6/mthood/about/> )

## SFI Standard

The 2005-2009 Sustainable Forestry Initiative Standard®<sup>8</sup> consists of a tiered array of Principles, Objectives, Performance Measures, and Indicators that collectively comprise an approach to forestry that is sustainable. Organizations or individuals that manage forestland or procure wood for use in the manufacture of forest products can subscribe to this voluntary standard in order to demonstrate a commitment to forestry programs that are economically viable, environmentally appropriate, and socially acceptable. Program Participants must follow these standards, and can choose to undergo a third-party certification against the standards to further demonstrate their commitment to following good practices.

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<sup>8</sup> For a complete copy of the SFI Standard go to <http://www.abouthfb.org/sfiprogram.cfm> and download the PDF document at <http://www.abouthfb.org/generalPDFs/SFBStandard2005-2009.pdf> .

The SFI Principles (listed on the following page) describe the overall approach to sustainable forestry that is embedded in all SFI requirements. Certification audits focus on the applicable Objectives, Performance Measures, and Indicators. Objectives are the broad categories of issues considered in SFI certification. In cases such as the Mt. Hood National Forest where only land management is involved Objectives 1-7 and 8 -13 apply. The actual metrics are found in the indicators. For this project 81 SFI Indicators organized under 25 SFI Performance Measures were deemed relevant.

## **SFI Principles**

### **1. Sustainable Forestry**

To practice sustainable forestry to meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing, and harvesting of trees for useful products with the conservation of soil, air and water quality, biological diversity, wildlife and aquatic habitat, recreation, and aesthetics.

### **2. Responsible Practices**

To use and to promote among other forest landowners sustainable forestry practices that are both scientifically credible and economically, environmentally, & socially responsible.

### **3. Reforestation and Productive Capacity**

To provide for regeneration after harvest and maintain the productive capacity of the forestland base.

### **4. Forest Health and Productivity**

To protect forests from uncharacteristic and economically or environmentally undesirable wildfire, pests, diseases, and other damaging agents and thus maintain and improve long-term forest health and productivity.

### **5. Long-Term Forest and Soil Productivity**

To protect and maintain long-term forest and soil productivity.

### **6. Protection of Water Resources**

To protect water bodies and riparian zones.

### **7. Protection of Special Sites and Biological Diversity**

To manage forests and lands of special significance (biologically, geologically, historically or culturally important) in a manner that takes into account their unique qualities and to promote a diversity of wildlife habitats, forest types, & ecological or natural community types.

### **8. Legal Compliance**

To comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations.

### **9. Continual Improvement**

To continually improve the practice of forest management and also to monitor, measure and report performance in achieving the commitment to sustainable forestry.

*Source: Sustainable Forestry Initiative® (SFI) Standard, 2005–2009 Edition*

## **Findings of Readiness Review**

Readiness Review findings are generally focused on the adequacy of documentation and existence of programs for each relevant Performance Measure. They are designed to ensure that the organization seeking certification understands the standard and has adequate program substance to justify the cost and expense of a full SFI Certification Audit. They are designed to identify gaps in programs or documentation rather than determining actual conformance with the requirement. Therefore this report focuses on areas where the Mt. Hood National Forest's programs and practices are not likely meeting the SFI requirements at this time.

The majority of the Gaps relate to SFI Program specific requirements. These include, for example, not having a statement of commitment to the SFIS, not having assigned SFI roles and responsibilities, not supporting the efforts of the SFI Implementation Committees, not filling out the SFI Annual Progress Report, and not conducting an annual management review of the effectiveness of the SFI Program. The complete list of gaps is found in Attachment 1, including a summary keyed to the standard and details for each gap.

The report sections which follow comprise the typical contents of an SFI Readiness Review and Audit Plan (text on this and previous pages was added to the typical NSF SFI Report Template to ensure that the following report would be understandable in the context of the pilot project). This explanatory text will be included in the final report as well.

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 Certification Dual Assessment Case Study - Mt. Hood National Forest
 

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**A. Operation(s) within the scope of SFIS Certification Audit:**

FRS #1 : ##### Location: Mt. Hood National Forest

**B. NSF Audit Team:**

Lead Auditor: Michael Ferrucci Auditor: Robert Hrubec

**C. Corrective Action Requests (CARs) Issued During the RR:**

MAJOR(S) : NA MINOR(S) : NA

The Program Participant is required to take appropriate corrective action prior to the SFI Certification Audit. Corrective Action Plans should be forwarded to the NSF Lead Auditor

Note: CARs were not issued – Gaps are identified, and will become CARs during Certification Audit unless measures are taken by the Forest Service to develop programs to fill these gaps.

**D. Audit Team Recommendation:** **Continue SFIS Certification Process.**

The SFIS Certification Evaluation has been tentatively scheduled for September 18 to 22, 2006.

 **Program Participant has major non-conformances that are being addressed and will be resolved prior to the SFIS Certification Audit.**

CAR Number(s) Requiring Proof of Corrective Action Implementation:

 **Program Participant has major non-conformance(s) that will not be resolved prior to the SFI Certification Audit. Client is advised to correct the deficiencies and submit a Corrective Action Plan to the lead auditor for approval prior to initiation of the SFIS Certification Audit.****E. Scope of the SFIS Certification:**

The scope of the organization includes: Forest Management Only. The specific SFIS Performance Measures and Indicators that are outside the scope of the Program Participant's SFI Program are described in Attachment 1 "Readiness Review Summary Sheet".

The wording of the scope of the SFIS Certification as described on the NSF Facility Record Sheet (FRS) has been reviewed with a representative of the Program Participant. The proposed scope: "Forest management activities on the Mt. Hood National Forest ."

 Is correctly listed on the FRS form Has been modified as follows:**F. Proprietary Issues:**

**Are there any proprietary issues?** (e.g., restricted access to areas of the site; restricted access to information such as attorney-client privileged compliance documents, etc.)  Yes  No  
(check one box)

If Yes, please explain:

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 Certification Dual Assessment Case Study - Mt. Hood National Forest
 

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**G. Readiness Review Summary:**

The SFIS Readiness Review (RR) visit was performed at the Mt. Hood National Forest's offices in Sandy, Oregon and selected field sites. Participants are documented in Attachment 3. The primary objectives of the review were to define the audit scope, define audit criteria, determine if the Program Participant is ready to continue with the NSF-ISR SFIS Certification process, and develop an audit plan.

**1. During the RR visit the lead auditor reviewed the following items with the Program Participant's management representative(s): (check all that apply)**

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> NSF SFI Procedures  | <input checked="" type="checkbox"/> The SFIS Certification Audit Matrix      |
| <input checked="" type="checkbox"/> Safety Awareness Issues   | <input checked="" type="checkbox"/> Population of Field Sites for Inspection |
| <input type="checkbox"/> Provided Corrective Action Requests  | <input type="checkbox"/> Identified Interviewees                             |
| <input checked="" type="checkbox"/> The Composition of the Audit Team and the need for any Special Expertise    |  |
| <input checked="" type="checkbox"/> Reviewed the Program Participant's SFI Program and supporting documentation |  |
| <input checked="" type="checkbox"/> Outlined the Audit Plan   | <input type="checkbox"/> Completed the Audit Plan                            |

**2. The review conducted by the lead auditor confirms the following items: (check all that apply)**

- Program Participant has customized indicators and evidence to demonstrate conformance with the SFI Standard? (If yes, attach SFIS indicators documents to the SFIS Audit Plan.)
- Program Participant has sufficient documentation of SFIS Conformance to proceed with Audit.
- The Program Participant's SFI Program appears to address each of the SFIS Performance Measures and Indicators that apply, including written policies as required under (LIST).
- The Program Participant has notified the Sustainable Forestry Board that it is initiating independent certification.
- At least one BMP Monitoring and Management Review cycle has been completed.
- Other: Comments: As noted above, this is a pilot project, and significant gaps exist in SFI requirements.

**H. Agreement Not to Disclose and Consult:**

All findings and reports generated as a result of the RR visit are confidential and governed by the provisions for confidentiality, which are described in the NSF-ISR Policies for Confidentiality.

**Appendices:**

- 1 Readiness Review Summary Sheet
- 2 Participants in Scoping / Readiness Review Meetings
- 3 Summary of Readiness Review Events
- 4 Tentative SFI Audit Plan (Note: may be provided as a separate document)

## Certification Dual Assessment Case Study - Mt. Hood National Forest

**APPENDIX 1**  
**NSF-ISR SFI Readiness Review Summary Sheet**  
**2005-2009 Sustainable Forestry Initiative Standard ®**

Reviewed by: Michael FerrucciDate of Review: August 22 and 23, 2006Program Participant Name and Location: Mt. Hood National Forest

Clause	Performance Measure Description	Indicators Which Do Not Apply	Programs & Documents Are Complete *	Programs & Documents Are <u>Not</u> Complete
Objectives 1 to 7	<b>Requirements for Land Management</b>			
1.1	Sustainable Long-Term Harvest Levels		All	
2.1	Reforestation		All	
2.2	Minimize Use of Chemicals		All	
2.3	Forest & Soil Productivity		All	
2.4	Forest Protection		All	
3.1	Best Management Practices		All	
3.2	Riparian Protection Measures	3.2.5	All	
4.1	Conservation of Native Biodiversity		All	
4.2	Application of Research & Science		All	
5.1	Visual Quality of Harvests		All	
5.2	Clear-cut Size, Shape, Placement	All		
5.3	“Green Up” or Alternative Methods	All		
6.1	Identification & Management of Special Sites		All	
7.1	Efficient Utilization		All	
Objective 8	<b>Requirements for Procurement</b>	All N.A.		
8.1	Good Forestry Practices for Landowners	All N.A.		
8.2	Use of Qualified Professionals	All N.A.		
8.3	Inventory and Procurement Practices	All N.A.		
8.4	Monitor BMP and Reforestation	All N.A.		
8.5	Prevent Illegal Logging	All N.A.		
8.6	Encourage Sound Practices	All N.A.		

\* Preliminary review indicates a program exists that aligns with SFI Requirements, and that documentation exists. Additional evidence to be reviewed by full audit team.

## Certification Dual Assessment Case Study - Mt. Hood National Forest

Clause	Performance Measure Description	Indicators Which Do Not Apply	Programs & Documents Are Complete *	Programs & Documents Are <u>Not</u> Complete
	<b>Requirements for All Program Participants (unless out of scope)</b>			
Objective 9	<b>Requirements for Research, Science, &amp; Technology</b>			
9.1	Funding for Research		All	
9.2	Analysis of Regeneration, Cut/Drain, BMP Implementation, & Biodiversity Information		All	
Objective 10	<b>Requirements for Training and Education</b>			
10.1	Training of Contractors and Personnel		All others	10.1.1, 10.1.2, 10.1.4
10.2	Improved Wood Producer Professionalism		All others	10.2.1
Objective 11	<b>Requirements for Legal &amp; Regulatory Compliance</b>			
11.1	Forestry Law/Reg. Compliance System		All	
11.2	Social Law Compliance		All	
Objective 12	<b>Requirements for Public &amp; Landowner Involvement</b>			
12.1	Cooperative Efforts for Sustainable Forestry		All others	12.1.1
12.2	Outreach, Education, Involvement		All others	12.2.1
12.3	Public Lands Planning Involvement		All	
12.4	Public Lands Conferring with Native Peoples		All	
12.5	Inconsistent Practices or Concerns		12.5.2	12.5.1
12.6	Annual Reporting	12.6.3		12.6.1 and 2
Objective 13	<b>Requirements for Management Review and Continual Improvement</b>			
13.1	Management Review System			All

\* Preliminary review indicates a program exists that aligns with SFI Requirements, and that documentation or other evidence exists, although the documentation may not yet have been fully evaluated. Additional evidence to be reviewed by full audit team.

## Certification Dual Assessment Case Study - Mt. Hood National Forest

Appendix 1 continued

**Details for Gaps Found**

<b>10.1.1</b>	<b>Written statement of commitment to the SFI Standard communicated throughout the organization, particularly to mill and woodland managers, wood procurement staff, and field foresters.</b>
Notes	The Forest Service has not committed to certification nor to the 2005-2009 Sustainable Forestry Initiative Standard ®
<b>10.1.2</b>	<b>Assignment and understanding of roles and responsibilities for achieving SFI Standard objectives.</b>
Notes	The Forest Service has not committed to certification nor to the 2005-2009 Sustainable Forestry Initiative Standard ®. Forest Service personnel have not been given specific SFI responsibilities.
<b>10.1.4</b>	<b>Contractor education and training sufficient to their roles and responsibilities.</b>
Notes	There is no aptitude requirement for timber harvesters. Fire contractors must prove their credentials. Other types of service contractors are beginning to include the ability to look at past performance, and consider training claims (performance-based contracting). Employees do not have primary responsibility for contractor safety, but can comment or refer situations to staff safety specialists. Safety provisions are part of all contracts, and in bid forms.
<b>10.2</b>	<b>Program Participants shall work closely with state logging or forestry associations, or appropriate agencies or others in the forestry community, to foster improvement in the professionalism of wood producers.</b>
<b>10.2.1</b>	Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producers' training courses that address a. awareness of sustainable forestry principles and the SFI Program; b. BMPs, including streamside management and road construction, maintenance, & retirement; c. regeneration, forest resource conservation, and aesthetics; d. awareness of responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act, and other measures to protect wildlife habitat; e. logging safety; f. U.S. Occupational Safety and Health Administration regulations, wage and hour rules, and other employment laws; g. transportation issues; h. business management; and i. public policy & outreach.
Notes	The Forest Service has a separate State and Private Forestry Program to provide such assistance, although no evidence was provided that such program involve logger training. Note that this indicator involves SFI-specific activities that would be expected to occur in concert with the Oregon SFI Implementation Committee.
<b>12.1</b>	<b>Program Participants shall support and promote efforts by consulting foresters, state and federal agencies, state or local groups, professional societies, and the American Tree Farm System® and other landowner cooperative programs to apply principles of sustainable forest management.</b>
<b>12.1.1</b>	<b>Support for efforts of SFI Implementation Committees.</b>
Notes	Forest Service has a separate State and Private Forestry Program to provide such assistance. However, if certification is sought some involvement with SIC will be needed. Forest Service personnel are involved in the Resources and People (RAP) Camp
<b>12.2</b>	<b>Program Participants shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education, and involvement related to forest management.</b>

## Certification Dual Assessment Case Study - Mt. Hood National Forest

12.2.1	<b>Support for the SFI Implementation Committee program to address outreach, education, and technical assistance (e.g., toll-free numbers, public sector technical assistance programs).</b>
Notes	Although Forest Service has a separate State and Private Forestry Program to provide assistance to private landowners, this indicator involves SFI-related activities.
12.5	<b>Program Participants shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees, the public, or Program Participants regarding practices that appear inconsistent with the SFI Standard principles and objectives.</b>
12.5.1	<b>Support for SFI Implementation Committee efforts (toll-free numbers and other efforts) to address concerns about apparent nonconforming practices.</b>
Notes	Mt. Hood National Forest and the National Forest System are not currently SFI Program Participants.
12.6	<b>Program Participants shall report annually to the SFI Program on their compliance with the SFI Standard.</b>
12.6.1 12.6.2	<b>Prompt response to the SFI annual progress report. Recordkeeping for all the categories of information needed for SFI annual progress reports.</b>
Notes	Mt. Hood National Forest and the National Forest System are not currently SFI Program Participants. All Program Participants receive a survey from AF&PA regarding a range of forest management and outreach activities. These surveys are reviewed as part of all SFI Audits. See <a href="http://www.aboutsfi.org/Certified_Public_Agency_Conservation_Group_and_Other_NonIndustrial_Forestland.doc">http://www.aboutsfi.org/Certified Public Agency Conservation Group and Other NonIndustrial Forestland.doc</a>
13.1	<b>Program Participants shall establish a management review system to examine findings and progress in implementing the SFI Standard, to make appropriate improvements in programs, and to inform their employees of changes.</b>
13.1.2	<b>System for collecting, reviewing, and reporting information to management regarding progress in achieving SFI Standard objectives and performance measures.</b>
13.1.3	<b>Annual review of progress by management and determination of changes and improvements necessary to continually improve SFI conformance.</b>
Notes	Mt. Hood National Forest is not currently an SFI Program Participant, and thus has not developed a system to manage and improve their SFI Program.

## Appendix 2

# Participants in Scoping / Readiness Review Meetings

### Attendees at All Meetings

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

### 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.

### Opening Meeting Monday August 22, 2006

Gary L. Larsen, Forest Supervisor, MHNH Headquarters  
Lisa Norris, Natural Resources Staff Officer, MHNH Headquarters  
Nancy Lankford, Forest Silviculturist, MHNH Headquarters  
Mike Redmond, Forest Environmental Coordinator, MHNH Headquarters  
Ivars Steinblums, Forest Hydrologist, MHNH Headquarters  
Malcolm Hamilton, Recreation Program Manager, , MHNH Headquarters  
Alan Dyck, Wildlife Biologist, MHNH Headquarters  
Jeanne Rice, Ecologist, MHNH Headquarters  
Jennie O'Connor, Forest Planner, MHNH Headquarters  
Duane Bishop, District Fisheries Biologist Zig Zag Ranger District

### Forest Service Personnel Interviewed at other Times

Alan Dyke, Wildlife Program Manager  
Malcolm Hamilton, Recreation Program Manager  
Duane Bishop, District Fisheries Biologist  
Ivars Steinblum, Forest Hydrologist  
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 Commander for two ongoing fires on the Mt. Hood National Forest  
Jim Rice, Forest Products Coordinator

### Stakeholders Interviewed:

Larry Potts, Warm Springs Tribal Enterprise

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Cal Mukumoto, 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

### Appendix 3

## Summary of Readiness Review Events

The field component of the scoping visit was conducted from August 22 through August 23, 2006 and included the following activities:

### Monday, August 21

Hrubes (FSC lead auditor) and Ferrucci (SFI lead auditor) fly into Portland and travel to Sandy, Oregon; final audit preparations that evening

### Tuesday, August 22:

Time	Meeting/Project	Location/Route	Information	Lead
0800-0900	Opening meeting	HQ Camas Room	Orientation of the assessment process	Robert Hrubes & Mike Ferrucci
0900-0930	Overview of the Mt Hood NF	HQ Camas Room	Overview of the Mt Hood NF and its management challenges	Gary Larsen
0930-1030	Description of the management direction for the Mt Hood NF	HQ Camas Room	Laws and forest plans, landscape level analyses, project level including NEPA	<b>Mike Redmond</b>
1030-1300	Interviews with staff	HQ Camas Room	Interviews with resource program managers – <b>Jeanne Rice, Jim Wrightson</b>	Robert Hrubes & Mike Ferrucci
1230-1300	Working lunch	HQ	Nancy to arrange lunches	
1300-1330	Zigzag RD	Travel to Zigzag RD	Pick up Zigzag folks	
1330-1430	Clear Fork Flood Restoration	FS Road 1825 Lolo Pass road	Restoration of fish habitat	<b>Duane Bishop</b>
1430-1500	Riley/Lost Crk/McNeil Campgrounds	FS road 1825	Horse campground Accessible campground Wilderness access	<b>Malcolm Hamilton</b>
1500-1630	Driving tour	FS road 2612 Hwy 26	Rec Residences Hwy 26 corridor Urban forest/development	<b>Malcom Hamilton</b>

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			Ski areas	
1630-1700	HQ	Travel to HQ		
1800-1900	Stakeholders meeting	HQ Camas Room	Public meeting	
1930-2200	Dinner	Nancy's house	BBQ—NW Theme	Nancy Lankford

**Wednesday, August 23:**

<b>Time</b>	<b>Meeting/Project</b>	<b>Location/Route</b>	<b>Information</b>	<b>Lead</b>
0700-0830	Meet HQ parking lot	Hwy 224	Stop at Clackamas RD to pick up folks	
0830-0930	'O' Thin	FS Road 4640	Riparian thinning	<b>Jim Rice</b>
0930-1100	'O' Thin Partner Thin	FS Road 4640 FS Road 5710	Matrix thinning – recent Matrix thinning - older	<b>Jim Rice</b> <b>Alan Dyck</b>
1100-1145	Tarzan	FS Road 4670	Regeneration Harvest under the NWFP	<b>Jim Rice</b>
1145-1300	HQ	Travel to HQ		
1300-1500	Interview with staff	HQ Camas Room	Continue interviews with resource program managers – <b>Ivars Steinblums, Dan Shively, Tim Johnson</b>	Robert Hrubes & FS staff
1300-1500	Audit Planning	HQ Camas Room	Planning and logistics for September audit	Mike Ferrucci & FS staff
1500-1700	Wrap Up discussions	HQ Camas Room		

Both lead auditors returning home.

## **Attachment 2**

# **Tentative Evaluation Plan for the Mt. Hood National Forest**

**September 7, 2006**



**Sustainable Forestry Initiative® Standard  
2005-2009 Edition**

**NSF International Strategic Registrations, Ltd.**

**789 North Dixboro Road**

**Ann Arbor, MI 48105**

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## **Project Background**

A field assessment of the Mt. Hood National Forest will be completed as part of a pilot test of forest certification being conducted by the USDA Forest Service and the Pinchot Institute. The project will be structured as if the Mt. Hood National Forest was seeking independent certification that its SFI Program conforms to the requirements of the Sustainable Forestry Initiative® (SFI) Standard, 2005-2009 Edition. This evaluation describes the conduct of the SFIS Certification Audit conducted by an audit team assembled by NSF-ISR to determine SFI conformance.

Additional information about NSF-ISR's SFIS Certification Audits is contained in the NSF-ISR SFIS Certification Process Standard Operating Procedure (AA-971-0003), which is consistent with the Sustainable Forestry Initiative® Audit Procedures and Qualifications (SFI APQ) 2005–2009 Edition. Audits for SFI Standard are also conducted in accordance with the principles of auditing contained in the International Organization for Standardization (ISO) 19011:2002 guidelines for quality and/or environmental management systems auditing.

## **SFIS Certification Scope and Objective**

The SFIS Certification Evaluation will apply to the Mt. Hood National Forest's SFI Program implementation including its forest management operations and other related activities that are covered by the SFI Standard. The evaluation objective is to establish whether the Mt. Hood National Forest's SFI program is in conformance with the SFIS Objectives, Performance Measures, and Indicators

## **Certification Criteria**

Determination of conformance to the SFI Standard will be based solely on the requirements of the 2005-2009 Sustainable Forestry Initiative® Standard. Findings will be based upon the standard language of the SFIS Objectives, Performance Measures and Indicators. The NSF-ISR Audit Team will not impose additional requirements that are not specified in the SFI Standard.

The verification indicators to be used are as listed in the 2005-2009 Sustainable Forestry Initiative Standard® (see <http://www.abouthfb.org/sfiprogram.cfm>). The SFIS Performance Measures that are included in and excluded from the scope of the SFIS Certification Audit are outlined in Appendix 1: Readiness Review Summary Sheet.

The Sustainable Forestry Initiative® Audit Procedures and Qualifications (SFI APQ) allows for the substitution or modification of SFI Indicators under certain conditions, or the use of additional indicators.<sup>9</sup> No substitute or additional indicators are to be utilized in this project.

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<sup>9</sup> 6.1.3. Substitution and Modification of SFI Program Participants, with consent of the audit firm, may substitute or modify indicators to address local conditions based on a thorough analysis and adequate justification to the audit firm, which is responsible for ensuring that revised indicators are consistent with

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Note: This plan is intended primarily to meet the requirements for a formal audit plan under the SFI Program. However it is also designed to meet the needs of the FSC Assessment. The major difference in the two programs is that the FSC reviews are somewhat less scripted, with greater flexibility during the field audits, and more ad hoc decisions regarding audit locations. This plan retains this flexibility, which is also a needed part of any SFI audit. Thus Forest Service personnel involved in the evaluation should be prepared for changes to this plan and actual audit activities. The FSC Lead Auditor, SFI Lead Auditor, and Mt. Hood National Forest Certification Management Representative will all work jointly to ensure a smooth audit.

### **Roles and Responsibilities**

The Mt. Hood National Forest's management representative with respect to this SFIS Certification Audit will be Lisa Norris, Natural Resources Staff Officer. The main contact for planning is Nancy Lankford, Silviculturist, Mt. Hood National Forest. Other members of the Mt. Hood National Forest's staff will be involved in the SFIS Certification Audit as determined by the above individuals.

The NSF-ISR lead auditor will be Michael Ferrucci. The other members of the audit team will include: Robert Hrubes, Ph.D. Forest Economist and Registered Professional Forester; Jim Spitz, Forestry Consultant; Dave Vesely, Pacific Wildlife Research, Corvallis, Oregon; Dr. David Perry, Professor, University of Hawaii at Manoa; Dr. Jonathan Kusel; and Karen Steer, Sustainable Northwest. Audit procedures and auditor qualifications are consistent with Sustainable Forestry Initiative® Audit Procedures and Qualifications (SFI APQ) 2005–2009 Edition. Information regarding auditor qualifications is provided in Appendix 4-A.

### **Confidentiality and Conflict of Interest**

All NSF-ISR auditors will maintain complete and strict confidentiality regarding all aspects of the audit. The Mt. Hood National Forest reserves the right to release NSF-ISR and its subcontractors from specific terms of this confidentiality agreement. NSF-ISR will retain one copy of the Mt. Hood National Forest's SFIS Indicators and evidence for its records.

All NSF audit team members will sign confidentiality agreements that include provisions regarding the avoidance of conflict of interest, including requirements of the SFI Standard. Prior to finalizing the audit team, the auditor and audit team members shall disclose to Mt. Hood National Forest any prior land appraisal or assessment work or land brokerage activity they or their employers conducted related to the property to be audited.

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the spirit and intent of the SFI Standard performance measures and indicators, and that changes are appropriate for the specific local conditions and circumstances and the Program Participant's scope of operation. Additional indicators beyond those identified in the SFI Standard, if included by the Program Participant, shall be audited like all other indicators.

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### **Readiness Review and Report**

A Readiness Review meeting between Forest Service staff and the lead auditors for NSF and for SCS was held at the Mt. Hood National Forest's offices on August 22-23, 2006. A general document review was performed, field sites were visited, the auditor's credentials were confirmed, and the overall substance of the audit plan was discussed. As an outcome, the lead auditor determined that the Mt. Hood National Forest is prepared, and necessary documentation appears sufficient\*, to undergo a full SFIS Certification Audit as outlined in this plan. The lead auditor has prepared a Readiness Review Report documenting that the Mt. Hood National Forest is ready to proceed with the SFIS Certification Audit, with appropriate cautions regarding exiting gaps and the nature of the pilot project. \* Note: Arrangements were made to provide supplemental information to the audit team before the assessment visit, with provisions for organizing the information to facilitate the review.

### **Project Timeline**

Revised Timeline - Certification Assessments (as of August 24, 2006)

***Completed on or before      Phase - Task***

Scoping Assessment

July 17, 2006	II.A) Scheduling and Logistics Phone Call
July 17, 2006	II.B) Document Request & Review sent to MTHNF
August 22-23, 2006	II.C) On-site Scoping Assessment (2 days)
September 6, 2006	II.D) Draft Scoping Reports Issued
September 12, 2006	II.D) Comments from MTHNF on the reports
September 15, 2006	II.D) Final Scoping Assessment Report provided

Full Certification Assessment – Option for Sept, 2006 Field Visit

Sept. 6, 2006	II.A&B) Document request for selected districts;
Sept 18-22, 2006	III.C,D) On-site full joint certification assessment
Oct. 27, 2006	IV.E) Delivery of draft reports
Nov. 24, 2006	IV.E) Comments from CNNF due on the reports
Dec. 1, 2006	IV.E) Both reports sent out for peer review
Dec. 22, 2006	IV.F) Delivery of final reports
TBD, if requested	V OPTIONAL Presentation of results

### **Field Sites and Interviewees**

#### **Potential Field Visit Sites**

The NSF-ISR audit team will inspect a variety of field sites to assess conformance with the SFI Standard. During audit planning the Lead Auditor and the Mt. Hood National

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Forest's representative reviewed the range of field activities and formulated a sampling plan. Selection of actual sites was based on a list of projects from the PALS database for 2005 and 2006, and a list of all timber sales projects that are under contract, or which have been closed in 2006.

**West-Side Field Sites:**

These lists were developed by Mt. Hood National Forest staff and provided to the SFI lead auditor. The lead auditor, working with Mt. Hood National Forest staff, devised the preliminary agendas for the west-side ranger districts (two of three field days) from the PALS list. Field sites were selected with the goal of covering a range of treatments and forest types, and including planned, on-going, and completed projects. This part of field site planning was started during the scoping visit.

(Note: Locations of timber sales projects that are under contract, or which have been closed in 2006 on the east-side were provided to the lead auditor late in the planning process. These are included in the Appendix Tables, and will be added to the planned field audits as per instructions provided below.)

Additional sites from Appendix Tables Table 2B-2: Recently Closed Sales and Table 2B-3: Volume Remaining As of June 30, 2006 are to be added by MHNH staff, starting from those that are highlighted in the tables. Logistics and time available will dictate final choices. More sites should be put on the schedule that can be expected to be visited, to allow for adjustments by the audit team based on the unfolding of the team's needs during the audit.

**East-Side Field Sites:**

The field sites for the third day of field visits will be finalized during the audit. A randomly prioritized list of projects was screened for projects in the east-side ranger districts. Forest staff provided descriptions of high-priority available sites from the prioritized list to assist in final selection of sites by the lead auditor. The Lead Auditor and Mt. Hood National Forest representatives will review these selections, assessing their range and how representative they are. Projects which received high priority random number selection will be considered first, with substitutions made by the Lead Auditor where logistics and sampling goals so dictate. Again, additional selections will be made by MHNH staff from the Appendix tables in this report so that some ongoing or completed work can be included in the field audit sample.

The field site list for the east-side will be somewhat larger than the number of sites expected to be visited, allowing adjustments during the audit to allow for additional samples as needed. Once selections are made, Mt. Hood National Forest staff will develop a generalized schedule the field site visits and provide this to the audit team each day of the audit. Close scheduling of audit visits will not be possible – instead the schedule should provide information regarding accessibility and travel time between sites.

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### Potential Audit Interviewees

The NSF-ISR lead auditor identified categories of potential interviewees that may be contacted during the SFIS Certification Audit. Mt. Hood National Forest personnel were asked to provide names/contact information so the audit team may conduct interviews. The contact information provided will be added to Appendix 4-C in the final report.

The following information was provided to or is available to the lead auditor:

- Top ten (10) Contract Loggers that harvest stumpage sales;
- Personnel of the Mt. Hood National Forest

The following categories require some assistance in developing contact lists for interviewees:

- Contract workers or organizations (planting, fuel management, chemical application);
- Key staff of major Oregon forestry associations;
- Staff or leadership of the SFI program State Implementation Committees;
- State or other Federal regulatory personnel responsible for the region.

### Tentative Certification Audit Schedule

The Pilot Joint SFIS Certification Audit / FSC Assessment is scheduled for Monday September 18 through Friday September 22, 2006. The agenda for the office and field audit is outlined immediately below, with additional details found in the following pages.

Dr. Robert Hrubes (FSC lead auditor) and Mike Ferrucci (SFI lead auditor) will fly into Portland and travel to Sandy, Oregon on Sunday September 17. The audit team members will make arrangements to drive to Sandy. The team will assemble and make final audit preparations that evening.

#### Monday, September 18

- 7:45            Audit Team Arrives SO
- 8 – 8:15        Welcome and Introductions, MHNF
- 8:15-9:00      Opening Session (Audit Leaders)
- 9- 9:45        Overview of MHNF   Gary Larson
- 9:45–10:30    Overview of Management Direction and Project Planning (NEPA)  
(Note: Ferrucci to be provided office space with phone from 9-10:30)
- 10:45-12:30   Breakout Sessions, (working lunches, audit team will provide their own)

Subject Areas	Auditors	MHNF
A: Timber, Roads	Mike Ferrucci and Jim Spitz	
B: Wildlife, Fisheries, Ecology	Dave Perry and Dave Vesely	
C: Recreation,	Robert Hrubes, Karen	Jeanne Rice, Gary Larson

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Tribal, Cultural	Steer, Jonathan Kusel,	
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12:30 -1 pm Travel to Zig-Zag Office

1 - 2 pm Introductions, Certification Overview (Lead Auditors), Zig Zag Overview

2-5:00 Field Tours (note Tour A may start at 1 pm)

Subject Areas	Auditors	Location(s)
A: Roads and Hydrology	Ferrucci, Spitz, Hrubes	Bull Run Road Decommissioning
B: Fisheries and Water Quality;	Perry and Vesely	MHNF selected fisheries project; 9394 Timberline Express Chairlift (no regen/ yes mature forest), Wildcat Thinning no regen/ no mature fst.) or Govt. Camp Fuels Reduction
C: Recreation	Karen Steer, Jonathan Kusel,	TBD by SCS: with tour B above OR on their own

7:30 pm Stakeholder Meeting (MHNF Supervisor's Office, Sandy)

### **Tuesday September 19 Clackamas River District**

8-9:30 Clackmas RD Office

Introductions, Certification Overview (Lead Auditors), Clackamas Overview

10 - Noon 2007 thinning project/ Sandstone/ lunch

Split:

Tarzan regen harvest (most of group)

M thinning (Ferrucci)

Ollalie Lake bug kill overview and various sites:

Group A: Vegetation Management Focus;  
additional site(s) from "Sales Under Contract" or "Recently closed sales"

Group B: Recreation Focus

Summit Thin Huckleberry Enhancement

Leave forest early enough to be in Gresham by 6 pm

Tuesday Evening: Optional Dinner FS and Team, Gresham, OR

### **Wednesday September 20 Eastside**

8:00-10 am Briefing at Hood River Ranger District , Parkdale:

Introductions (10 minutes)

MF RH Overview of Certification (15 minutes)

Hood River Overview (20 minutes)

Barlow RD Overview (20 minutes)

Discussions, with identified themes:

Fire      Forest Health      Tribal      Invasive Plants

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10-4:00 Field Visits, selections from Appendix

3 Tours:

Forest Health-related north loop

Ramsey/Sportsman's fuels

The Mt. Hood Complex (recent fires) will be a separate, side trip with at least one of the Social Scientists, potentially Robert, and Debora Roy, our Acting Fire Management Staff Officer. So Deb can escort in a separate vehicle, probably to the viewpoint which is northeast of Mt. Hood Meadows off of Hwy 35 (near Robinhood Campground on the map). The staging area at Mt. Hood Meadows has all been demobilized.

4 – 5 Return to Sandy

Evening: Auditor's begin deliberations, possibly over dinner

### **Thursday September 21**

8-9 Team deliberations (private, meeting room needed) what are the holes

9-11:30 Follow-up discussions, selected MHNF staff

Noon to 8 pm Team Synthesis

### **Friday September 22**

8- 2 Team deliberations (private, meeting room needed)

2-3 Break for audit team, Lead Auditors prepare for exit meeting

3-5 Exit Meeting

## **Process Overview and Day One Schedule Details**

### **Audit Team Meeting**

The NSF-ISR Audit Team will receive introductory materials in advance of the audit, and may have preliminary e-mail and telephone discussions regarding the assignments and logistics. The audit team will meet prior to conducting the audit to review the audit plan and make any final adjustments. This meeting will occur the night before the opening meeting, in Sandy, Oregon.

### **Opening Meeting and Interviews**

The Opening Meeting will be held at Forest Supervisor's offices in Sandy, Oregon on Monday, September 18<sup>th</sup> at 8am. Attendance at the Opening Meeting will include the Mt. Hood National Forest's leadership and NSF-ISR's Audit Team. The purpose of the meeting is to introduce all parties, review the SFIS Certification Process and the FSC process, confirm the audit plan and responsibilities, and attend to any outstanding issues.

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The lead auditor will explain the audit procedures contained in the SFIS Certification Audit Matrix and the appropriate lines of communication between the NSF-ISR lead auditor and the Mt. Hood National Forest's management representative. Similar issues will be covered for the FSC portion of the assessment, in discussions led by the SCS lead auditor.

The audit schedule will be reviewed including the dates, times and locations of meetings. The specific field sites and routes to be traveled will be finalized, based upon weather and access constraints. The interviewees will be identified and contact information will be arranged. Other aspects of the audit plan will be discussed including the content of the final and summary reports, tentative dates of publication of the final and summary reports, procedures in the event that the final report is delayed, confidentiality procedures, the NSF-ISR dispute resolution process, and the tentative date for issuance of the NSF-ISR certificate of SFIS conformance.

At the conclusion of the Opening Meeting, the Mt. Hood National Forest will present an overview of its operations, with a focus on inventory, planning, monitoring, and public involvement, and other details regarding its conformance with the certification requirements. Any health and safety and emergency procedures will also be discussed.

Following the Opening Meeting audit team members and Mt. Hood National Forest specialists will meet in smaller groups to conduct focused discussions regarding certification requirements. Breakout Sessions in three main topic areas are:

- A. Timber and Roads
- B. Wildlife, Fisheries, Ecology
- C. Recreation, Tribal, Cultural (working lunches, audit team will provide their own)

The table "SFI Objectives and Assignments" on page 51 provides the SFI assignments for each auditor, keyed to the SFI Standard. For ease of understanding the focus areas for the auditors are described below:

- Mike Ferrucci     Inventory, Planning, Outreach and Involvement
- Robert Hrubes     FSC, stakeholder involvement
- Jim Spitz             Silviculture, Chemical Use, Invasive Control, Tribal
- Dave Vesely         RTE Protection, Special Sites, Wildlife Management, Fisheries
- David Perry         RTE Protection, Special Sites, Wildlife Management, Fisheries
- Steer and Kusel     Tribal, Stakeholders, Social Issues

A similar table for the FSC responsibilities will also be provided.

### **Field Day Details for Day 2 (Clackamas) and Day 3 (East-side):**

#### **Daily Briefings**

Each day of the SFIS Certification Audit will begin with a brief opening meeting to document the day's schedule, responsibilities, and arrangements; to obtain any needed

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documents; and to answer other preliminary questions regarding the certification process. The opening meeting will be followed by office discussions as detailed below.

Where time allows, each day will conclude with a brief meeting at the same office where the day starts. Alternatively, as dictated by scheduling needs, the daily briefing may be conducted less formally between the lead auditor and the management representative during travel time. The purposes include a review of the days findings, including any non-conformances, to confirm plans for the evening, and an opportunity to revise the next day's schedule based on issues under review.

Any potential areas of minor or major non-conformance shall be identified during the field audit and discussed at the daily closing meeting. Any additional evidence or field site investigations that could clarify the areas of non-conformance should be identified and prepared for the following day.

### **Office Discussions, Ranger District Offices**

As per the schedule provided on pages 44 to 46, discussion sessions will be held in various ranger districts. These will follow the opening meeting remarks from the lead auditors described in the previous section. The ranger district meetings should include as many district staff as possible. The District Ranger or their designee will provide an overview of the district and its management issues. Auditors will then ask questions in group session and/or conduct separate interviews with district personnel. These discussions will continue throughout the day as auditors and district staff members interact during the field visit. The forest should ensure that sufficient vehicles are available so that the 5 field-oriented audit team members (the social scientists will attend some but not most field visits) can travel from site to site with different staff members.

### **Project Level Information Needed**

The auditors will travel together at times and on separate tours at other times. For pre-selected sites (see "Certification Audit Schedule" section above) information packets should be provided to each auditor that include:

- Location and project maps
- Brief project description (1 page preferred)
- Supplemental information at the discretion of RD staff or Mt. Hood National Forest specialists

More detailed information can be obtained later as needed, but Mt. Hood National Forest staff should bring their project files to the field to the extent this is practical.

### **Daily Closing Briefing (5 to 6 pm)**

The auditors will meet back at the Ranger District Office for about an hour and then conduct a Closing Meeting at the end of the second day. The purposes include a review of the days findings, including any non-conformances, and an opportunity to revise the next day's schedule based on issues under review. RD staff should also be prepared to

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provide additional documentation from their files (paper or computer) that will help the auditors in their assessment of conformance to the standards.

### **Thursday September 21**

#### Overview:

The audit team will require space at the Forest Supervisor's office, including telephone and internet access.

8-9 Team deliberations (private, meeting room needed) what are the holes?

9-11:30 Follow-up Office Discussions, selected MHNF staff

Noon to 8 pm Team Synthesis

#### Office Discussions, SO (9-11:30 am)

This working session provides the final opportunity for the audit team to ask follow-up questions and to request additional documentation. Key Mt. Hood National Forest headquarters staff should be available to the extent possible. Attendees will be at the discretion of MHNF, with additional staff involved as needed and available. The audit team will attempt to pull together a short list of key questions or issues so that the forest can respond efficiently.

#### Auditor Deliberations (Noon to 8 pm)

The audit team will require space at the Forest Supervisor's office, including telephone and internet access. The team will work together to review findings and reach preliminary conclusions regarding both SFI and FSC requirements. Observers may be invited to participate.

### **Friday September 22**

#### Overview:

The audit team will require space at the Forest Supervisor's office, including telephone and internet access.

8- 2 Team deliberations continue (private, meeting room needed)

2-3 Break for audit team, Lead Auditors prepare for exit meeting

3-5 Exit Meeting

#### Auditor Deliberations (8 am - 2 pm)

Auditor deliberations will continue throughout Friday as well.

#### Closing Meeting (3 to 5 pm)

The closing meeting will be held in the Mt. Hood National Forest's headquarters office. The audit team and all interested Mt. Hood National Forest staff will participate.

The audit team will make an oral presentation of audit findings, discuss any minor or major non-conformances, and the lead auditor's recommendation regarding overall conformance with the SFI Standard. Possible audit recommendations including Immediate Certification, Pending Certification and Deny Certification are detailed in NSF-ISR's SFIS Certification Process SOP.

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Any minor or major non-conformances shall be fully documented in the SFIS Certification Audit Matrix and Corrective Action Requests (CARs) and presented to the Mt. Hood National Forest for review and discussion. The Mt. Hood National Forest will have the opportunity to discuss and clarify any outstanding issues related to the CARs and any other aspects of the audit. Each of the Corrective Action Request forms will be signed by the Mt. Hood National Forest's management representative.

Every effort will be made to resolve all questions and issues related to the SFIS Certification Audit before the end of the Closing Meeting. The Lead Auditor shall fully explain the next steps of producing the draft final and summary reports for review by the Mt. Hood National Forest. Timeframes for completing the audit report process and issuing the final report will be finalized.

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### SFI Objectives and Assignments

Legend: Lead in **Bold**; primary support role - not bold; all team members are able to participate in review of any indicator

Criterion/Indicator	Robert Hrubes	Steer and Kusel	Jim Spitz	Dave Vesely	David Perry	Mike Ferrucci	Field Relevant Criteria
Objective 1						<b>1.1</b>	
Objective 2	<b>2.2</b>		<b>2.1 2.3</b> 2.4			2.1 2.3 <b>2.4 2.5</b>	2.1 to 2.4
Objective 3			<b>3.1</b> 3.2			3.1 <b>3.2</b>	3.1 3.2
Objective 4				<b>4.1 4.2</b>	<b>4.1 4.2</b>		4.1 4.2
Objective 5						<b>5.1 5.3</b>	5.1 5.3
Objective 6				<b>6.1</b>	<b>6.1</b>		<b>6.1</b>
Objective 7			<b>7.1</b>			<b>7.1</b>	<b>7.1</b>
Objective 8-- NA							NA
Objective 9			9.2	9.2		<b>9.1 9.2</b>	-
Objective 10	10.1					<b>10.1 10.2</b>	10.1
Objective 11	<b>11.1 11.2</b>	<b>11.2</b>	11.2			11.1	11.1
Objective 12	<b>12.3</b> 12.4	<b>12.3 12.4</b>	12.4	12.2, 12.3		<b>12.1 12.2</b> 12.3 <b>12.5 12.6</b>	-
Objective 13						<b>13.1</b>	-

Mike Ferrucci: Office and Cell 203-887-9248; [mferrucci@iforest.com](mailto:mferrucci@iforest.com)

Robert Hrubes: Phone: (510) 452-8007 Cell: (510) 913-0696; [rhrubes@scscertified.com](mailto:rhrubes@scscertified.com)

Jim Spitz- 541-389-5978; [jspitz@bendcable.com](mailto:jspitz@bendcable.com)

Dave Vesely; Phone: (541)745-5025; [dvesely@pwri.com](mailto:dvesely@pwri.com)

Dave Perry- 541-597-4650; [dave\\_perry38@msn.com](mailto:dave_perry38@msn.com)

Jonathan Kusel; Phone 530-284-1022; [jkusel@sierrainstitute.us](mailto:jkusel@sierrainstitute.us)

Karen Steer ; Phone 503-260-8335; [ksteer@sustainablenorthwest.org](mailto:ksteer@sustainablenorthwest.org)

### **Dispute Resolution Process**

The NSF Lead Auditor is responsible for making a recommendation for certification. The NSF Certification Review Board member will review the audit report, consider the Lead Auditor's recommendation, and make a final determination regarding ability of the Mt. Hood National Forest to achieve certification, should it be sought.

In the event that there is a dispute between the lead auditor and the Mt. Hood National Forest over interpretations of the SFI Standard or any other aspect of the certification audit the first step is for the Program Participant's management representative to call the Audit Manager (888-NSF-9000) to resolve the dispute. If the dispute continues, the formal dispute resolution process of NSF-ISR (AE-989-0002) will be followed.

### **Reporting**

#### **Process for Preparation and Review of the Final Report**

The lead auditor will draft an unofficial final report consistent with the format and contents outlined in the NSF-ISR SFIS Certification Process SOP. The lead auditor shall arrange to have the NSF-ISR CB Member conduct a review of the report and provide a certification recommendation at that time. The CB reviewer normally makes the final decision regarding certification and provides editing comments or suggested changes to the Lead Auditor in a timely manner.

The lead auditor shall make necessary revisions and then forward the draft final report to the Mt. Hood National Forest for a review of factual accuracy by July 10, 2006. The Mt. Hood National Forest should submit comments to the lead auditor by July 31, 2006. The lead auditor will incorporate appropriate suggestions from the Mt. Hood National Forest and then forward the Final Report to the NSF-ISR SFI CB reviewer within one week of receipt of comments.

The SFI CB reviewer will review the Final Report for thoroughness and completeness and will send the Final Report to NSF and will ensure that a copy is provided to the Mt. Hood National Forest by September 4, 2006. If additional time is required the SFI Program Manager and/or the Lead Auditor will so notify the Mt. Hood National Forest.

#### **Summary Report**

If this were a standard certification, a Public Summary Report would be provided to the Sustainable Forestry Board. The content of the summary report would be agreed to by NSF-ISR and the Mt. Hood National Forest to ensure that it captured all of the relevant findings. The lead auditor will develop a Draft Public Summary and will work with the management representative to finalize this audit summary. The summary shall include the audit scope and process, the names of the auditors, the indicators used, and a summary of relevant findings.

#### **Distribution of Reports**

The final and summary reports are the sole property of the Mt. Hood National Forest. The distribution of the final and summary reports will be at the discretion of the Mt. Hood National Forest. Consistent with the requirements of the Sustainable Forestry Initiative® Audit

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Procedures and Qualifications (SFI APQ) 2005–2009 Edition , the Mt. Hood National Forest should submit a copy of the summary report to the Sustainable Forestry Board and AF&PA.

All working documents, draft and final and summary reports in the possession of the audit team members and lead auditor shall be destroyed at the end of the SFIS Certification Audit process, unless agreed to in writing by NSF-ISR and the Mt. Hood National Forest. NSF-ISR and the lead auditor shall retain one copy of all documents related to the SFIS Certification in permanent files for purposes of conducting surveillance audits and re-audits, and for other legitimate purposes.

**Certificate of Conformance will not be Issued**

In a normal assessment, upon successful completion of the SFIS Certification Audit process as contained in this Audit Plan, NSF-ISR would issue a formal certificate of conformance with the SFI Standard. The content of the SFIS Certificate is outlined in the NSF-ISR SFIS Certification Process Standard Operating Procedure. As this is only a pilot project no certificate will be issued.

**Surveillance Audit and Re-audit Schedule**

The final step in the audit planning process is normally to tentatively schedule periodic surveillance audits. If this were a formal certification, the periodic surveillance audits would be scheduled within twelve months of the initial audit, and will generally occur annually.

**Appendices for Audit Plan**

- Appendix 2-A: Qualifications of Auditors
- Appendix 2-B: Potential Field Sites
- Appendix 2-C: Potential Interviewees

## Appendix 2-A

### Qualifications of Auditors

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

##### **Role: SFI Team Leader Scoping and Full Assessments**

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 precertification reviews throughout the United States. He has also led joint SFI and Forest Stewardship Council (FSC) certification projects in Wisconsin, Michigan, Maryland, Maine, and Connecticut and a joint scoping or precertification gap-analysis project on tribal lands throughout the United States. He is qualified as a RAB EMS Lead Auditor (ISO 14001 Environmental Management Systems), as an SFI Lead Auditor, as an FSC Team Leader, and as a Tree Farm Group Certification Lead Auditor.

Mike has 26 years of forest management experience. His expertise is in sustainable forest management planning; in certification 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. He has also developed expertise in the conservation of forest biodiversity at multiple spatial scales through his involvement in the founding and administration of The Conservation Forestry Network and through his work with the Northern Forest Protection Fund.

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, Rhode Island, New Jersey, Pennsylvania, Maryland, West Virginia, Kentucky, Tennessee, Georgia, Alabama, Minnesota, Michigan, Wisconsin, Arizona, California, Oregon, and Washington. Mike is a 26-year member of the Society of American Foresters and is active in the Association of Consulting Foresters and the Connecticut, Massachusetts, and Rhode Island State Implementation Committee (SIC) for the Sustainable Forestry Initiative.

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

##### **Role: FSC Team Leader on Scoping and Full Assessments**

Dr. 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

### **Dave Vesely, M.S. Forest Science**

#### **Role: Ecology, Wildlife Biology**

Dave currently works as a Natural Resources Consultant to state and federal agencies, watershed councils, and private companies. Previously he was president, Pacific Wildlife Research, Inc. His professional experiences and responsibilities have included a wide variety of natural resources projects, including: biological assessments of wildlife and their habitats, natural resource problem analyses, design and implementation of wildlife studies, and developing recommendations for managing wildlife habitats. His skills include technical writing and editing, advanced knowledge of wildlife and forestry survey methods, statistical analyses, using GIS for cartography and landscape analyses, and leading teams of interdisciplinary specialists. Dave's education includes three college degrees:

M.S. Forest Science, 1996. Oregon State University.

B.F.A. Illustration, 1991. Oregon State University.

B.A. Psychology, 1977. University of Minnesota.

### **Dr. David Perry, Professor, University of Hawaii at Manoa**

#### **Role: Ecology, Wildlife Biology**

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

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

#### **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 in Bend, Oregon.

**Karen Steer, MS Social Ecology**

**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.**

**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.

## Appendix 2-B

### Potential Field Visit Sites - Mt. Hood National Forest

**Table 2B-1: Contracts Planned to be Awarded For the FY06 Target**

\*Sales highlighted in green were selected by the lead auditors as priorities for sampling.

Sale Name	Ranger District	Volume MMBF	Volume CCF	Planned Advertisement Date	Award Date	Regen Component	Mature Forest
Hi Thin	Barlow	1.64	3306	Advertised 12/05	Held up for a financial review	No	No
Stern	Hood River	1.16	2228	Advertised 1/06	4/14/06	No	No
V Thin Stewardship Contract	Clackamas River	0.62	1212	Advertised 2/06	1/06	No	No
Summit Thin	Clackamas River	0.44	876	Advertised 4/06	6/06	No	No
Fan Thin	Clackamas River	2.2	4381	April 2006	6/06	No	No
Wildcat Thin	Zig Zag	1.6	3000	April 2006	8/06	No	No
Sportsman's Park Stewardship Contract	Barlow	2.84	6000	June 2006	9/06	No	Yes
Timberline Express	Zigzag	0.74	1430	July 2006	7/06	No	Yes
1929 Thin	Clackamas River	4.1	8000	August 2006	9/06	No	No
Cold Thin	Clackamas River	3.56	8000	August 2006	9/06	No	No
Moore Thin	Clackamas River	3.97	8600	September 2006	9/06	No	No
SMM	Barlow	2.62	5000	August 2006	9/06	Yes	No
Permits and Add on Volume	Forest wide	2.0					
<b>TOTAL</b>		<b>27.49</b>					

**FY06 Target – 24.5 mmbf “Awarded”**

**Potential Accomplishment – 27.49 mmbf total – 23.52 mmbf awarded before 9/30/06**

## Certification Dual Assessment Case Study - Mt. Hood National Forest

**Table 2B-2: Recently Closed Sales**

(within last 2 years – summarized from quarterly TSA476-01 reports)

\*\*Sales highlighted in yellow have a regen component within a mature forest type

District #	Date closed	Contract #	Sale Name	Purchaser Name
01	4/19/06	078368	Upper Boulder	High Cascade Inc.
05	4/19/06	079713	Bear II	Herbert Lumber Co.
01	2/22/06	078822	Con 2	Dodge Logging Inc
01	3/01/06	078905	Con 4	Dodge Logging Inc
05	3/01/06	079309	Bay Resale II	Rosboro Lumber Co.
05	1/13/06	079820	Orchard II Bough	Carlos R CEH
05	1/13/06	079838	Wanderers Peak II Bough	Carlos R CEH
06	2/22/06	079010	Stick	Rosboro Lumber Co.
05	8/01/05	079275	Bonanza III	Rosboro Lumber Co.
05	4/13/05	079564	Batwings	Swanson Group, Inc
05	3/1/05	078913	Sunbeam ATV	Hampton Tree Farms
05	1/1/05	078962	Decoy II	Grim Logging Co.
05	1/1/05	079515	Guard	Hampton Tree Farms
05	1/28/05	079663	Jane	Thomas Cr. Lumber
05	1/18/05	079721	BF Salvage	Thomas Cr. Lumber
05	2/2/05	079739	Howl EP Bough	Maria G Sandoval
05	2/2/05	079747	Mitchell Bough	Carlos R CEH
05	2/2/05	079754	Southfork Ridge Bough	Frank Granstrom
06	1/12/05	079069	Chee	High Cascade, Inc
06	2/2/05	079762	Clear Lake Vista Bough	Carlos R CEH
09	2/1/05	079606	Salmonberry 5	North West Lands
05	11/1/04	078939	Lemiti Resale	Rosboro Lumber
06	11/24/04	079077	Ship	Thomas Cr. Lumber

## Certification Dual Assessment Case Study - Mt. Hood National Forest

**Table 2B-3: Volume Remaining As of June 30, 2006 (TSA 475-02)**

District	Purchaser	Sale Name	UOM	Volume Remaining	Termination Date	Regen Component	Mature Forest
<b>Barlow</b>							
	High Cascade, Inc.	Path	ccf	3,830	7/31/2009	YES	YES
		East Fivemile	ccf	1,015	8/31/2007	YES	YES
		West Fivemile	ccf	3,664	8/31/2007	YES	YES
		Hi North	ccf	-	3/31/2006	YES	YES
		Hi South	ccf	-	3/31/2006	YES	YES
	Dodge Logging, Inc.	Con 3	ccf	8,037	10/31/2006	YES	YES
		Hipo	ccf	-	3/31/2006	YES	YES
	Thomas Creek Lmbr. & Log Co.	Rock	ccf	649	7/31/2008	YES	YES
	Southside Enterprises, Inc.	Tap Salvage	ccf	-	3/25/2006	YES	
	Joe Zumstein Logging	Hi Thin	ccf	3,306	3/31/2008		
<b>Total Volume Remaining</b>			ccf	<b>20,501</b>			
<b>Clackamas River</b>							
	Rosboro Lumber Co., LLC	Pardner II	ccf	1,931	8/16/2007		
		Upper Orchard	ccf	1,614	6/10/2008		
			ccf	4,646	7/30/2009		
	Freres Lumber Co., Inc.	Cub	ccf	7,361	9/30/2008	YES	YES
		Solo- Litigation	ccf	7,328	3/31/2006	YES	YES
		Slip	ccf	1,949	3/31/2009		
	Thomas Creek Lmbr. & Log Co.	Borg- Litigation	ccf	1,593	3/31/2004	YES	YES
		Tarzan	ccf	1,735	9/9/2008	YES	YES
		M	ccf	3,584	11/15/2006		
	High Cascade, Inc.	P Thin Stewardship	ccf	1,941	3/31/2008		
		O Thin Stewardship	ccf	4,670	3/31/2008		
	Wayne Stone Logging, Inc.	Y	ccf	-	3/31/2007		
		Fan Thin	ccf	4,381	3/31/2009		
	Rick McKay Corp.	W	ccf	-	3/31/2007		
		V Thin Stewardship	ccf	1,080	3/31/2008		
	Joe Zumstein Logging	G	ccf	-	6/30/2006		
		B	ccf	7,469	11/14/2008		
		Summit Thin	ccf	876	4/30/2007		

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<b>Total Volume Remaining Hood River</b>		<b>ccf</b>	<b>52,157</b>				
Kinzua Resources LLC	Yaka 22/23	ccf	-	7/17/2007	YES	YES	
High Cascade, Inc.	Bow	ccf	7,092	3/31/2009			
	Stern	ccf	2,228	3/31/2008			
<b>Total Volume Remaining Forest</b>			<b>9,320</b>				
<b>Total Volume Remaining</b>		<b>ccf</b>	<b>81,978</b>				

## Certification Dual Assessment Case Study - Mt. Hood National Forest

**Table 2B-4: East-side Selections:**

<b>Project Number</b>	<b>Project Name</b>	<b>Comments</b>
13060	Billy Bob Fuels Reduction	This is a fuels reduction project in a WUI near Camp Baldwin. The proposed action was developed in a collaborative group. The IDT will begin analysis this fall and CE decision is expected at the end of fiscal year '07. Easy to get to--just 20 minutes from the Hwy 35/ FS 4400 junction.
7168	Tap Salvage	This project salvaged approximately 90 acres of dead and dying Lodgepole pine. Easy to get to--15 minutes from Hwy 35 on FS 4400.
14131	Middle Fork Irrigation District Wingwall Project	This would add wingwalls to the Middle Fork Irrigation dam spillway at Lawrence Lake to improve structural integrity. The NEPA is not yet complete. This is located 10 minutes from the Mt. Hood office.
14702	Eastside Special Forest Products Program 2006-2010	This documentation authorizes the issuance and administration of permits and contracts for the harvest of a variety of forest products and minor uses (both commercial and personal use). There are particular mushroom, firewood and poll sites that can be easily accessed from major roads.
9544	Teacup Lake Warming Cabin for Oregon Nordic Club Groomed Track System	The project covered the construction of a warming cabin approximately 20 ft by 30 ft. which is owned by the Oregon Nordic Club and open to the general public. NEPA and implementation are complete. This is located just off Hwy 35 near Teacup Snopark.
9540	Precommercial Thinning	This project has been cancelled.
12218	Site-Specific Invasive Plant Treatment EIS for Mt. Hood NF/CRGNSA (Oregon)	Jennie O'Connor would have the most up-to-date information on this project.
7189	Precommercial Thinning	As part of the precommercial thinning program, the Forest Service proposed to precommercial thin 3,793 acres over the next 5 years (2005-2010) on the Barlow Ranger District. The NEPA is completed. Implementation is contingent upon funding each year.
7231	Road 4420 Heritage Resource Site Restoration	There is a heritage resource site located on FS Road 4420 that is subject to damage from traffic and erosion. The district proposes to cover this site to protect it and to decrease erosion along this section of road. The NEPA has not been completed.
12265	Sportsman's Park Hazardous Fuels Reduction Project	This is a fuels reduction project in a WUI (Sportsman's Park). The proposed action was developed in a collaborative group. The NEPA is complete. Implementation is expected in spring 2007.
6994	Cub/Tap Commercial Thinning	This project commercially thinned approximately 60 acres of pine that was planted in a harvest unit 40 years ago. It is located on FS Road 4400 near 4420--about 20 minutes from the Hwy 35/FS Road 4400 junction.
12257	Eightmile Salvage	This project will salvage dead and dying Lodgepole pine on approximately 222 acres. The NEPA is complete and has been advertised. There is pending litigation which may hold up the award of the sale. The sale area is flagged and marked. It is about 30 minutes from the junction of Hwy 35 and FS Road 4400.

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5570	Long Prairie Grazing Allotment	This project re-authorized grazing on the Long Prairie Allotment. The NEPA was completed in September 2005. Cattle will not be turned out onto the allotment until 2007 or 2008. The allotment is about 20 minutes from the Mt. Hood office.
5576	Wildlife Guzzlers on the Ramsey Creek Parcel, Project #56	Guzzlers would be constructed above Ramsey Creek where water is in short supply on the ridge. This project was done in partnership with the Rocky Mountain Elk Foundation, the National Wild Turkey Federation, and the Oregon Hunters Association. NEPA and implementation are complete.
7227	Tree Salvage in The Dalles Watershed	The project is to cut and remove dead trees from along roads to use for stream restoration and firewood. The NEPA is completed and the contract work should be completed this fiscal year. The project is located with The Dalles Watershed, but can be easily accessed on the perimeter roads.
9550	Lake Branch Riparian Thinning and Wood Removal	This project includes additional riparian thinning and wood removal on Lake Branch Creek. The NEPA is complete and contract work is in progress. This should be completed before the site visit and a 10-minute drive from the Mt. Hood office.
5522	Bear Knoll Thinning EA	This project will thin approximately 530 acres. The NEPA is complete and the contract has been awarded. Implementation could begin this fall. This is located on the former Bear Springs district and is a 20 minute drive from the Hwy 35/26 junction.

## Appendix 2-C Potential Audit Interviewees

The following categories of potential interviewees may be contacted during the SFIS Certification Audit. Other categories were previously requested and provided (loggers and forest staff lists). Forest Service personnel are requested to develop and organize a list of names and contact information so that the audit team may conduct appropriate interviews.

- Contract workers or organizations (planting, fuel management, chemical application); Nancy is faxing the FY2006 Register of Contractors (service contracts)
- Key staff of major Oregon forestry associations; provided below
- Staff or leadership of the SFI program State Implementation Committees; Mike Ferrucci will obtain
- State or other Federal regulatory personnel responsible for the region provided below

### Key Staff of Major Oregon Forestry Associations

Tom Partin, President, American Forest Resource Council, 503.222.9505, [tpartin@afrc.ws](mailto:tpartin@afrc.ws)  
Chris West, VPres, AFRC (*same as above*), 503.222.9505, [cwest@afrc.ws](mailto:cwest@afrc.ws)

Rex Storm, Forest Policy Mgr, Associated Oregon Loggers, Inc., 503.364.1330  
[rexstorm@oregonloggers.org](mailto:rexstorm@oregonloggers.org)

### State & Federal Regulatory Personnel Responsible for the Region

Michael Tehan, Director, US National Marine Fisheries Service (US NMFS), 503.231.2224,  
[Michael.Tehan@noaa.gov](mailto:Michael.Tehan@noaa.gov)

Ben Meyer, Branch Chief for Willamette Basin (includes Mt. Hood), US NMFS, 503.320.5425,  
[Ben.Meyer@noaa.gov](mailto:Ben.Meyer@noaa.gov)

Kemper McMaster, State Supervisor, US Fish & Wildlife Service (US FWS), 503.231.6179,  
[Kemper\\_McMaster@fws.gov](mailto:Kemper_McMaster@fws.gov)

Bob Progulske, Forest Resources Mgr, US FWS, 503.231.6935, [Bob\\_Progulske@fws.gov](mailto:Bob_Progulske@fws.gov)

Andy Schaedel, Oregon State Dept. of Environmental Quality, Water Quality Section NW  
Region, 503.229.6121 [schaedel.andrew@deq.state.or.us](mailto:schaedel.andrew@deq.state.or.us)

### Industry Contacts:

Kevin Godbout (Chair), Weyerhaeuser Company  
P.O. Box 9777, Mail Stop CH2D23, Federal Way, WA 98063-9777  
253/924-3878 253/924-3866 fax  
[kevin.godbout@weyerhaeuser.com](mailto:kevin.godbout@weyerhaeuser.com)  
Chris Jarmer, Oregon Forest Industries Council  
Box 12826, Salem, OR 97309-0826  
503/371-2942 503/371-6223 fax [chris@ofic.com](mailto:chris@ofic.com)

## Appendix 2-D

### Full Assessment Schedule - 9.13.06

#### Monday, September 18<sup>th</sup> – Headquarters & Zigzag RD

Time	Meeting/Project	Location/Route	Information	Lead
0800-0815	Welcome	HQ Conference Rms	Welcome & introductions by the MTH staff	Gary Larsen
0815-0900	Opening Session	HQ Conference Rms	Orientation of the assessment process	Robert Hrubes & Mike Ferrucci
0900-0945	Mt Hood NF Overview	HQ Conference Rms	Overview of the Mt Hood NF and its management challenges	Gary Larsen
0945-1030	Description of the management direction for the Mt Hood NF	HQ Conference Rms	Overview of management direction and project planning including NEPA	<b>Mike Redmond</b>
1045-1230	Breakout sessions with staff (working lunch)	HQ Clackamas Lake Conference Rm	Panel discussion & interviews for timber & road resources: <b>Jim Rice, Nancy Lankford, Jim Tierney, Tim Johnson, Jeff Reis?</b>	Mike Ferrucci & Jim Spitz
1045-1230	Breakout sessions with staff (working lunch)	HQ Umbrella Falls Conference Rm	Panel discussion & interviews for wildlife, fisheries, ecology resources: <b>Alan Dyck, Dan Shively, Jeanne Rice, Ivars Steinblums</b>	Dave Perry & Dave Vesely
1045-1230	Breakout sessions with staff	HQ Ramona Falls Conference Rm	Panel discussion & interviews for recreation, tribal & cultural resources: <b>Malcolm Hamilton, Rick McClure, Jeff Jaqua, Gary Larsen</b>	Robert Hrubes, Karen Steer, Jonathan Kusel
1230-1300	Travel to Zigzag RD	Zigzag RD	HQ Vehicles 4114, 4115, 4116 Meet in upper HQ parking lot	Drivers: <b>Nancy Lankford, Jim Rice, Malcolm Hamilton</b>
1300-1400	Introductions & Overview	Zigzag RD	Introductions, Certification Overview, Zigzag RD Overview	Lead Auditors District Ranger Daina Bambe
1400-1700	Tour A Bull Run Road Decommissioning	Lolo Pass Road/FS Road 10/1027  HQ Vehicle 4115	Roads and hydrology  Auditors: Mike Ferrucci, Robert Hrubes, Jim Spitz	<b>Lisa Norris</b> Nancy Lankford, Jim Tierney, Todd Parker

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		ZZ Vehicle (Todd)		
1400-1700	Tour B Fisheries, Water Quality, Fuels Reduction	Hwy 26  Vehicle 4114 Jim W driving own vehicle	Salmon River side channel project Govt Camp Fuels Reduction project Timberline Express Chairlift (Todd P for hydrology will be on Tour A)  Auditors: Dave Perry & Dave Vesely	<b>Dan Shively/ Duane Bishop, Jim Wrightson, Christy Covington, Jim Rice,</b> Doug Jones, Jennifer Harris, Mike Redmond?
1400-1700	Tour C Recreation	Hwy26  Vehicle 4116	Trillium Lake Campground Timberline Lodge Ramona Falls Trailhead  Auditors: Karen Steer & Jonathan Kusel	<b>Malcolm Hamilton,</b> Kathleen Walker, Mary Ellen Fitzgerald
1700-1730	Travel to HQ	Sandy	Return to HQ	
1930-2100	Stakeholders meeting	HQ Conference Rms	Public meeting	Lead Auditors

**Tuesday, September 19<sup>th</sup> – Clackamas River RD**

<b>Time</b>	<b>Meeting/Project</b>	<b>Location/Route</b>	<b>Information</b>	<b>Lead</b>
0730-0800	Travel to Estacada	Hwy 211/224	HQ Vehicles 4114, 4115 4116  Meet in upper HQ parking lot	Drivers: <b>Jim Rice,</b> <b>Nancy Lankford,</b> <b>Malcolm Hamilton</b>
0800-0930	Clackamas River RD Office	Conference Room	Introductions, Certification Overview, Clackamas River RD Overview, PowerPoint presentation of 2007 planning process	Lead Auditors <b>District Ranger Andrei Rykoff</b>
0930-1130	2007 Thinning	Hwy 224 FS Road 4620  HQ Vehicle 4114, 4115,4116 CLA Vehicle 1 (Jim R) CLA Vehicle 2 (Jim R)  Jim Tierney & Burnham in separate vehicles for road	Sandstone Project Area (1/2 hour travel to site)  Auditors: full team (7)	<b>Jim Rice,</b> Glenda Goodwyne, Sharon Hernandez, Bob Bergamini, Gwen Collier, Tim Johnson, Jennie O'Connor, Andrei Rykoff, Gary Larsen, Nancy Lankford  <b>Jim Tierney &amp; Burnham Chamberlain</b> (on call)

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		mtnc/infrastructure & planting, TSI contracts		
1130-1300	Regen harvest	FS Road 46/4672 CLA Vehicle 1 (Jim R)	Cub or Bear II (instead of Tarzan)  Auditor: Mike Ferrucci	<b>Nancy Lankford, Glenda Goodwyne</b>
1130-1400	Regen & recent thinning harvest	FS Road 46/4670  HQ Vehicle 4114, 4115,4116 CLA Vehicle 2 (Jim R)	Tarzan regeneration harvest 'M' Thinning (1/2 hour travel to site)  Auditors: partial to full team (7)	<b>Jim Rice</b> , Glenda Goodwyne, Sharon Hernandez, Bob Bergamini, Gwen Collier, Tim Johnson, Jennie O'Connor, Andrei Rykoff, Gary Larsen, Nancy Lankford
1400-1530	Group A Veg Mgmt	FS Road 4220 & 4230  HQ Vehicle 4114, 4115, 4116 CLA Vehicle 1 (Jim R)	Olallie Lake Bug Kill & Thinning program, Warm Springs fuelbreak proposal (1/2 hour travel to site)  Auditors: team (5)	<b>Jim Rice</b> , Glenda Goodwyne, Sharon Hernandez, Bob Bergamini, Gwen Collier, Tim Johnson, Nancy Lankford
1400-1530	Group B Recreation	FS Road 4220 --- Or --- Hwy 224 to 4610  CLA Vehicle 2 (Jim R)	Olallie Lake Resort & Cmpgd ---- Or ---- Hwy 224 Campgrounds & Ladee Flats/No Whiskey TS, OHV use (1/2 hour travel to site)  Auditors: Karen Steer, Jonathan Kusel	<b>Larry Reed</b> , Jacquelyn Oakes, Malcolm Hamilton  Bob Bergamini for Ladee Flats/OHV
1530-1730	Travel to Estacada	FS Road 46 Hwy 224	Return to Estacada & Potential closeout meeting	
1730-1800	Travel to HQ and Gresham	Hwy 224/211	Return to HQ Return to Gresham by 1800 for optional Dinner with FS Staff and audit team	

**Wednesday, September 20<sup>th</sup> – Eastside Districts**

<b>Time</b>	<b>Meeting/Project</b>	<b>Location/Route</b>	<b>Information</b>	<b>Lead</b>
0700-0800	Travel to Hood River RD Office	Hwy 26/35	HQ Vehicles 4114, 4115 4116  Meet in upper HQ parking lot	Drivers: <b>Jim Rice, Nancy Lankford, Doug MacCleery?</b>

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0800-1000	Hood River RD Office	Conference Room	Introductions, Certification Overview, Hood River/Barlow RDs Overview (20minutes each) Discussion on fire, forest health, tribal, invasive plants themes	Lead Auditors HR District Ranger Daina Bambe <b>Acting Barlow District Ranger</b>
1000-1600	<u>North Tour</u> Forest health, grazing, invasive plants, & salvage logging	Hwy 35 FS Road 44/4420  FS Road 44  FS Road 4430  FS Rd 4430 to 1720 to 17  FS Road 17 north to Hwy 35  HQ Vehicle 4114 HR Vehicle 1 (Erin) HR Vehicle 3 (Erin)	Tap Salvage or Cub CT (1/4 hour travel to site, 45 min discussion)  Precommercial Thinning & 8 Mile Salvage (1 hour discussion)  Billy Bob Hazardous Fuels Reduction (WUI) (1/4 hour travel to site, 45 min discussion)  West Five Mile TS (1 hour discussion)  Long Prairie Range Allotment (1/2 hour travel to site, 1 hour discussion)  Return to Hood River Office (1/2 hour travel)  Auditors:	<b>Dan Fissell, Kim Smolt, Scott MacDonald, Larry Rector, Roy Shelby, Mike Dryden, John Dodd, Chris Rossel, Mark Kreiter, Nancy Lankford</b>
1000-1600	<u>South Tour</u> Fire/fuels, Tribal, Special Forest products, OHV	Hwy 35 to FS Road 3545  FS road 48  FS road 48 to 43 to 2640  FS road 48/Hwy 35  HQ Vehicle 4115,4116 HR Vehicle 2 (Erin)	Teacup Lake Warming Cabin (20min travel to site, 1/2 hour discussion)  Sportsman Park (1 hour travel to site, 1 hour discussion)  Bear Knoll TS (45 min travel to site, 1 hour discussion)  Return to Hood River Office (45 minutes travel)  Auditors:	<b>Kevin Slagle, Ray Weiss, Erin Black, Rich Thurman, Cheryl Sonnabend, Darcy Morgan, , Jim Rice,</b>
1000-1600	Mt Hood Fire Complex	Deb Roy bringing separate vehicle	Auditors: Karen Steers and maybe Robert Hrubes	
1600-1700	Travel to Sandy	Hwy 35/26	Return to HQ	

## Certification Dual Assessment Case Study - Mt. Hood National Forest

**Observers:** will travel in a separate rented vehicle. Will Price & Jake Donnay, Pinchot Institute (M-W, M-F), Doug MacCleery, W.O. Certification Evaluation Lead, Shawnie Mohoric, R.O. Planning/EMS (M), Peggy Kain, R.O. Veg Mgmt (W). Jennie O'Connor, Planner (will travel with the observers on Monday and float with district staff)

**Thursday, September 21st – Headquarters Office**

Time	Meeting/Project	Location/Route	Information	Lead
0800-0900	Team Deliberations	HQ Conference Rooms	Team deliberations and identification of information gaps	Audit Leads
0900-1130	Team Deliberations	HQ Conference Rooms	Follow-up discussions with selected FS staff to TBD	Audit team
1200-1900	Team Deliberations	HQ Conference Rooms	Team Synthesis	Audit team

**Friday, September 22nd – Headquarters Office**

Time	Meeting/Project	Location/Route	Information	Lead
0800-1400	Team Deliberations	HQ Conference Rooms	Team deliberations	Audit Leads
1400-1500	Break	HQ Conference Rooms	Break for team, audit leads prepare for exit meeting	Audit team
1500-1700	Exit Meeting	HQ Conference Rooms	Overview of findings All FS staff invited	Audit team

**Example Project Description:** ‘O’Commercial Thinning #500

**Project Lead:** Jim Rice

**Background Information:**

This stand is approximately 45 years old and was replanted with Douglas fir. Management direction prior to the Northwest Forest Plan was to maximize timber production. Currently, over 80% of the stand is within Riparian Reserve land allocation and the remainder is within the matrix with a Forest Plan land allocation of B-8, Earthflow. The stand was commercially thinned earlier this spring using hand fallers and a skyline logging system. The silvicultural objective was to reduce the basal area to a level that maximized individual tree growth to meet riparian reserve objectives. The prescription/marketing/cruising guide marked for leave approximately 6 future wildlife trees per acre and the retention of 25 to 30 Relative Density (approximately 80 trees per acre) using a designation by description of 14 feet designed to incorporate the concepts of variable density thinning (VDT). Snags and down woody debris may be created in the next five years depending on the availability of KV funding.

**Discussion items** – wide spacing to meet Riparian Reserve objectives, future management, wildlife snags and down woody debris. Also, this stand was scheduled for thinning 10 years ago but was delayed due to litigation.

**Reference:** Cloak EA, Lower Clackamas Watershed Analysis

## Certification Dual Assessment Case Study - Mt. Hood National Forest

“Under our current FY06 program, the only sale that has a regeneration component is 8 MM Salvage. That sale is mainly salvage of Lodgepole pine mortality caused by the mountain pine beetle. Perhaps the confusion originated in the discussion of our current program as compared to previous activity.”

8MM	Barlow	2.62	5000	August 2006	9/06	Yes	No
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Note: This was one of my priority selections.

## **Attachment 3: Certification Evaluation Matrix**

## Certification Dual Assessment Case Study – Mount Hood National Forest

NSF-ISR auditors use this document to record their findings for each SFIS Performance Measure and Indicator. If a non-conformance is found the auditor shall fully document the reasons on the Corrective Action Request (CAR) form. N/A in the Auditor column indicates that the associated Performance Measure or Indicator does not apply to the MHNF.

**Key to Findings:**

Findings are indicated by a date or date code: Audit Date: August/September 2006 Date Code: 6

C Conformance

EXR Exceeds the Requirement

Maj Major Gap

Min Minor Gap

OFI Opportunity for Improvement

**Objective 1: To broaden the implementation of sustainable forestry by ensuring long-term harvest levels based on the use of the best scientific information available.**

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
<b>1.1</b>	<b><i>Program Participants shall ensure that long-term harvest levels are sustainable and consistent with appropriate growth and-yield models and written plans.</i></b>	<b>MF</b>			6		
1.1.1	A long-term resource analysis to guide forest management planning at a level appropriate to the size and scale of the operation, including: a. a periodic or ongoing forest inventory; b. a land classification system; c. soils inventory and maps, where available; d. access to growth-and-yield modeling capabilities; e. up-to-date maps or a geographic information system (GIS); f. recommended sustainable harvest levels; and g. a review of nontimber issues (e.g., pilot projects and economic incentive programs to promote water protection, carbon storage, or biological diversity conservation).	<b>MF</b>	6				
1.1.2	Documentation of annual harvest trends in relation to the sustainable forest management plan.	<b>MF</b>	6				
1.1.3	A forest inventory system and a method to calculate growth.	<b>MF</b>	6				
1.1.4	Periodic updates of inventory and recalculation of planned harvests.	<b>MF</b>	6				
1.1.5	Documentation of forest practices (e.g., planting, fertilization, and thinning) consistent with assumptions in harvest plans.	N/A					

## Certification Dual Assessment Case Study – Mount Hood National Forest

**Objective 2: To ensure long-term forest productivity and conservation of forest resources through prompt reforestation, soil conservation, afforestation and other measures.**

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
<b>2.1</b>	<b><i>Program Participants shall reforest after final harvest, unless delayed for site-specific environmental or forest health considerations, through artificial regeneration within two years or two planting seasons, or by planned natural regeneration methods within five years.</i></b>	<b>JS, MF</b>	6				
2.1.1	Designation of all management units for either natural or artificial regeneration.	<b>JS, MF</b>	6				
2.1.2	Clear Requirements to judge adequate regeneration and appropriate actions to correct under-stocked areas and achieve desired species composition and stocking rates for both artificial and natural regeneration	<b>JS, MF</b>	6				
2.1.3	Minimized plantings of exotic tree species and research documentation that exotic tree species, planted operationally, pose minimal risk.	<b>JS, MF</b>		6			
2.1.4	Protection of desirable or planned advanced natural regeneration during harvest.	<b>JS, MF</b>	6				
2.1.5	Artificial reforestation programs that consider potential ecological impacts of a different species or species mix from that which was harvested.	<b>JS, MF</b>	6				
<b>2.2</b>	<b><i>Program Participants shall minimize chemical use required to achieve management objectives while protecting employees, neighbors, the public and the forest environment.</i></b>	<b>RH</b>	6				
2.2.1	Minimized chemical use required to achieve management objectives.	<b>RH</b>	6				
2.2.2	Use of least toxic and narrowest spectrum pesticide narrowest spectrum and least toxic pesticides necessary to achieve management objective.	<b>RH</b>	6				
2.2.3	Use of pesticides registered for the intended use and applied in accordance with the label requirements.	<b>RH</b>	6				
2.2.4	Use of Integrated Pest Management where feasible.	<b>RH</b>	6				
2.2.5	Supervision of forest chemical applications by state-trained or certified applicators.	<b>RH</b>	6				
2.2.6	Use of best management practices appropriate to the situation; for example: adjoining landowners or nearby residents notified of applications and chemicals used; appropriate multi-lingual signs or oral warnings used; public road access controlled during and after applications; streamside and other needed buffer strips appropriately designated; positive shut-off and minimal drift spray valves used; drift minimized by aerially applying forest chemicals parallel to buffer zones; water quality monitored or other methods used to assure proper ...	<b>RH</b>	6				

## Certification Dual Assessment Case Study – Mount Hood National Forest

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
2.2.6	...equipment use and stream protection of streams, lakes and other waterbodies; chemicals stored at appropriate locations; state reports filed as required; or methods used to ensure protection of federally listed threatened & endangered species						
<b>2.3</b>	<b><i>Program Participants shall implement management practices to protect and maintain forest and soil productivity.</i></b>	<b>JS, MF</b>	6				
2.3.1	Use of soils maps where available.	<b>JS, MF</b>	6				
2.3.2	Process to identify soils vulnerable to compaction and use of appropriate methods to avoid excessive soil disturbance.	<b>JS, MF</b>	6				
2.3.3	Use of erosion control measures to minimize the loss of soil and site productivity.	<b>JS, MF</b>	6				
2.3.4	Post-harvest conditions conducive to maintaining site productivity (e.g., limited rutting, retained down woody debris, minimized skid trails).	<b>JS, MF</b>	6				
2.3.5	Retention of vigorous trees during partial harvesting, consistent with silvicultural norms for the area.	<b>JS, MF</b>					6
2.3.6	Criteria that address harvesting and site preparation to protect soil productivity.	<b>JS, MF</b>	6				
2.3.7	Minimized road construction to meet management objectives efficiently.	<b>JS, MF</b>			6		
<b>2.4</b>	<b><i>Program Participants shall manage so as to protect forests from damaging agents such as environmentally or economically undesirable wildfire, pests and diseases to maintain and improve long-term forest health, productivity and economic viability.</i></b>	<b>MF, JS</b>			6		
2.4.1	Program to protect forests from damaging agents.	<b>MF, JS</b>	6				
2.4.2	Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents.	<b>MF, JS</b>			6		
2.4.3	Participation in, and support of, fire and pest prevention and control programs.	<b>MF, JS</b>	6				
<b>2.5</b>	<b><i>Program Participants that utilize genetically improved planting stock including those derived through biotechnology shall use sound scientific methods and follow all applicable laws and other internationally applicable protocols.</i></b>	<b>MF</b>	6				
2.5.1	Program for appropriate research, testing, evaluation and deployment of genetically improved planting stock including trees derived through biotechnology.	<b>MF</b>	6				

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**Objective 3: To protect water quality in streams, lakes and other water bodies.**

Performance Measure/ Indicator		Audit -or	--- Indicate Only One ---				OFI
			C	EXR	Maj	Min	
<b>3.1</b>	<b><i>Program Participants shall meet or exceed all applicable federal, provincial, state and local water quality laws and meet or exceed Best Management Practices developed under Environmental Protection Agency (EPA)-approved state water quality programs other applicable federal, provincial, state or local programs.</i></b>	<b>JS, MF</b>	6				
3.1.1	Program to implement state or provincial equivalent BMPs during all phases of management activities.	<b>JS, MF</b>					6
3.1.2	Contract provisions that specify BMP compliance.	<b>JS, MF</b>	6				
3.1.3	Plans that address wet weather events (e.g., inventory systems, wet weather tracts, defining acceptable operational conditions, etc.).	<b>JS, MF</b>	6				
3.1.4	Monitoring of overall BMP implementation.	<b>JS, MF</b>	6				
<b>3.2</b>	<b><i>Program Participant shall have or develop, implement, and document, riparian protection measures based on soil type, terrain, vegetation and other applicable factors.</i></b>	<b>MF, JS</b>	6				
3.2.1	Program addressing management and protection of streams, lakes and other water bodies and riparian zones.	<b>MF, JS</b>	6				
3.2.2	Mapping of streams, lakes and other water bodies and riparian zones, and where appropriate, identification on the ground.	<b>MF, JS</b>	6				
3.2.3	Implementation of plans to manage or protect streams, lakes and other water bodies.	<b>MF, JS</b>	6				
3.2.4	Identification and protection of nonforested wetlands, including bogs, fens, vernal pools and marshes of significant size.	<b>MF, JS</b>	6				
3.2.5	Where regulations or BMPs do not currently exist to protect riparian areas, use of experts to identify appropriate protection measures.	N/A					

## Certification Dual Assessment Case Study – Mount Hood National Forest

**Objective 4: Manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape- level measures that promote habitat diversity and the conservation of forest plants and animals including aquatic fauna.**

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
<b>4.1</b>	<b><i>Program participants shall have programs to promote biological diversity at stand- and landscape- scales.</i></b>	<b>DP, DV</b>		6			
4.1.1	Program to promote the conservation of native biological diversity, including species, wildlife habitats, and ecological or natural community types, at stand and landscape levels.	<b>DP, DV</b>	6				
4.1.2	Program to protect threatened and endangered species.	<b>DP, DV</b>		6			
4.1.3	Plans to locate and protect known sites associated with viable occurrences of critically imperiled and imperiled species and communities. Plans for protection may be developed independently or collaboratively and may include Program Participant management, cooperation with other stakeholders, or use of easements, conservation land sales, exchanges, or other conservation strategies	<b>DP, DV</b>		6			
4.1.4	Development and implementation of criteria, as guided by regionally appropriate science, for retention of stand-level wildlife habitat elements (e.g., snags, mast trees, down woody debris, den trees, nest trees).	<b>DP, DV</b>		6			
4.1.5	Assessment, conducted individually or collaboratively, of forest cover types and habitats at the individual ownership level and, where credible data are available, across the landscape, and incorporation of findings into planning and management activities, where practical and when consistent with management objectives.	<b>DP, DV</b>		6			
4.1.6	Support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership.	<b>DP, DV</b>		6			
4.1.7	Participation in programs and demonstration of activities as appropriate to limit the introduction, impact, and spread of invasive exotic plants and animals that directly threaten or are likely to threaten native plant and animal communities.	<b>DP, DV</b>		6			
4.1.8	Program to incorporate the role of prescribed or natural fire where appropriate.	<b>DP, DV</b>					6
<b>4.2</b>	<b><i>Program Participants shall apply knowledge gained through research, science, technology, and field experience to manage wildlife habitat and contribute to the conservation of biological diversity.</i></b>	<b>DP, DV</b>	6				
4.2.1	Collection of information on critically imperiled and imperiled species and communities and other biodiversity-related data through forest inventory processes, mapping, or participation in external programs, such as NatureServe, state or provincial heritage programs, or other credible systems. Such participation may include providing nonproprietary scientific information, time, and assistance by staff, or in-kind or direct financial support.	<b>DP, DV</b>	6				

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Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
4.2.2	A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management decisions.	DP, DV	6				

**Objective 5: To manage the visual impact of harvesting and other forest operations.**

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
5.1	<i>Program Participants shall manage the impact of harvesting on visual quality.</i>	MF	6				
5.1.1	Program to address visual quality management.	MF	6				
5.1.2	Incorporation of aesthetic considerations in harvesting, road, landing design and management, and other management activities where visual impacts are a concern.	MF	6				
5.2	<i>Program Participants shall manage the size, shape, and placement of clearcut harvests.</i>	N/A					
5.2.1	Average size of clearcut harvest areas does not exceed 120 acres, except when necessary to respond to forest health emergencies or other natural catastrophes.	N/A					
5.2.2	Documentation through internal records of clearcut size and the process for calculating average size.	N/A					
5.3	<i>Program Participants shall adopt a green-up requirement or alternative methods that provide for visual quality.</i>	MF	6				
5.3.1	Program implementing the green-up requirement or alternative methods.	MF	6				
5.3.2	Harvest area tracking system to demonstrate compliance with the green-up requirement or alternative methods.	MF	6				
5.3.3	Trees in clearcut harvest areas are at least 3 years old or 5 feet high at the desired level of stocking before adjacent areas are clearcut, or as appropriate to address operational and economic considerations, alternative methods to reach the performance measure are utilized by the Program Participant.	N/A	6				

**Objective 6: To manage Program Participant lands that are ecologically, geologically, historically, or culturally important in a manner that recognizes their special qualities.**

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
6.1.	<i>Program Participants shall identify special sites and manage them in a manner appropriate for their unique features.</i>	DP, DV		6			

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Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
6.1.1	Use of existing natural heritage data and expert advice in identifying or selecting sites for protection because of their ecologically, geologically, historically, or culturally important qualities.	DP, DV		6			
6.1.2	Appropriate mapping, cataloging, and management of identified special sites.	DP, DV		6			

**Objective 7: To promote the efficient use of forest resources.**

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
7.1	<i>Program Participants shall employ appropriate forest harvesting technology and “in-woods” manufacturing processes and practices to minimize waste and ensure efficient utilization of harvested trees, where consistent with other SFI Standard objectives.</i>	JS, MF	6				
7.1.1	Program or monitoring system to ensure efficient utilization, which may include provisions to ensure a. landings left clean with little waste; b. residues distributed to add organic and nutrient value to future forests; c. training or incentives to encourage loggers to enhance utilization; d. cooperation with mill managers for better utilization of species and low-grade material; e. merchandizing of harvested material to ensure use for its most beneficial purpose; f. development of markets for underutilized species and low-grade wood; g. periodic inspections and reports noting utilization and product separation; or h. exploration of alternative markets (e.g., energy markets).	JS, MF	6				

**Objective 8: To broaden the practice of sustainable forestry through procurement programs.  
Not Applicable (Procurement is not a part of the US Forest Service program. )**

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**Objective 9: To improve forestry research, science, and technology, upon which sound forest management decisions are based.**

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
<b>9.1</b>	<b><i>Program Participants shall individually, through cooperative efforts, or through associations provide in-kind support or funding, in addition to that generated through taxes, for forest research to improve the health, productivity, and management of forest resources.</i></b>	<b>MF</b>	6				
9.1.1	Current financial or in-kind support of research to address questions of relevance in the region of operations. The research will include some or all of the following issues: a. forest health, productivity, and ecosystem functions; b. chemical efficiency, use rate, and integrated pest management; c. water quality; d. wildlife management at stand or landscape levels; e. conservation of biological diversity; and f. effectiveness of BMPs.	<b>MF</b>	6				
<b>9.2</b>	<b><i>Program Participants shall individually, through cooperative efforts, or through associations develop or use state, provincial, or regional analyses in support of their sustainable forestry programs.</i></b>	<b>MF DV, JS</b>	6				
9.2.1	Participation, individually or through cooperative efforts or associations at the state, provincial, or regional level, in the development or use of a. regeneration assessments; b. growth-and-drain assessments; c. BMP implementation and compliance; and d. biodiversity conservation information for family forest owners.	<b>MF DV, JS</b>	6				

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**Objective 10: To improve the practice of sustainable forest management by resource professionals, logging professionals, and contractors through appropriate training and education programs.**

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
<b>10.1</b>	<b><i>Program Participants shall require appropriate training of personnel and contractors so that they are competent to fulfill their responsibilities under the SFI Standard.</i></b>	<b>MF, RH</b>			6		
10.1.1	Written statement of commitment to the SFI Standard communicated throughout the organization, particularly to mill and woodland managers, wood procurement staff, and field foresters.	<b>MF, RH</b>			6		
10.1.2	Assignment and understanding of roles and responsibilities for achieving SFI Standard objectives.	<b>MF, RH</b>			6		
10.1.3	Staff education and training sufficient to their roles and responsibilities.	<b>MF, RH</b>	6				
10.1.4	Contractor education and training sufficient to their roles and responsibilities.	<b>MF, RH</b>			6		
<b>10.2</b>	<b><i>Program Participants shall work closely with state logging or forestry associations, or appropriate agencies or others in the forestry community, to foster improvement in the professionalism of wood producers.</i></b>	<b>MF</b>			6		
10.2.1	Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producers' training courses that address a. awareness of sustainable forestry principles and the SFI Program; b. BMPs, including streamside management and road construction, maintenance, & retirement; c. regeneration, forest resource conservation, and aesthetics; d. awareness of responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act, and other measures to protect wildlife habitat; e. logging safety; f. U.S. Occupational Safety and Health Administration regulations, wage and hour rules, and other employment laws; g. transportation issues; h. business management; and i. public policy and outreach.	<b>MF</b>			6		

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**Objective 11: Commitment to comply with applicable federal, provincial, state, or local laws and regulations.**

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
<b>11.1</b>	<b><i>Program Participants shall take appropriate steps to comply with applicable federal, provincial, state, and local forestry and related environmental laws and regulations.</i></b>	<b>RH, MF</b>	6				
11.1.1	Access to relevant laws and regulations in appropriate locations.	<b>RH, MF</b>	6				
11.1.2	System to achieve compliance with applicable federal, provincial, state, or local laws and regulations.	<b>RH, MF</b>	6				
11.1.3	Demonstration of commitment to legal compliance through available regulatory action information.	<b>RH, MF</b>	6				
11.1.4	Adherence to all applicable federal, state, & provincial regulations and international protocols for research & deployment of trees derived from improved planting stock & biotechnology.	<b>RH, MF</b>	6				
<b>11.2</b>	<b><i>Program Participants shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state, and local levels in the country in which the Program Participant operates.</i></b>	<b>KS, JK, RH, JS</b>	6				
11.2.1	Written policy demonstrating commitment to comply with social laws, such as those covering civil rights, equal employment opportunities, antidiscrimination and anti-harassment measures, workers' compensation, indigenous peoples' rights, workers' and communities' right to know, prevailing wages, workers' right to organize, and occupational health and safety.	<b>KS, JK, RH</b>	6				

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**Objective 12: To broaden the practice of sustainable forestry by encouraging the public and forestry community to participate in the commitment to sustainable forestry and publicly report progress.**

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
<b>12.1</b>	<b><i>Program Participants shall support and promote efforts by consulting foresters, state and federal agencies, state or local groups, professional societies, and the American Tree Farm System® and other landowner cooperative programs to apply principles of sustainable forest management.</i></b>	<b>MF</b>	6				
12.1.1	Support for efforts of SFI Implementation Committees.	<b>MF</b>			6		
12.1.2	Support for the development and distribution of educational materials, including information packets for use with forest landowners.	<b>MF</b>	6				
12.1.3	Support for the development and distribution of regional or statewide information materials that provide landowners with practical approaches for addressing biological diversity issues, such as specific wildlife habitat, critically imperiled or imperiled species, and threatened and endangered species.	<b>MF</b>	6				
12.1.4	Participation in efforts to support or promote conservation of working forests through voluntary market-based incentive programs (e.g., current-use taxation programs, Forest Legacy, or conservation easements).	<b>MF</b>	6				
12.1.5	Program Participants are knowledgeable about credible regional conservation planning and priority-setting efforts that include a broad range of stakeholders. Consider the results of these efforts in planning where practical and consistent with management objectives.	<b>MF</b>	6				
<b>12.2</b>	<b><i>Program Participants shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education, and involvement related to forest management.</i></b>	<b>MF DV, JS</b>	6				
12.2.1	Support for the SFI Implementation Committee program to address outreach, education, and technical assistance (e.g., toll-free numbers, public sector technical assistance programs).	<b>MF, DV, JS</b>			6		
12.2.2	Periodic educational opportunities promoting sustainable forestry, such as a. field tours, seminars, or workshops; b. educational trips; c. self-guided forest management trails; or d. publication of articles, educational pamphlets, or newsletters; or e. support for state, provincial, and local forestry organizations and soil and water conservation districts.	<b>MF, DV, JS</b>		6			
12.2.3	Recreation opportunities for the public, where consistent with forest management objectives.	<b>MF, DV, JS</b>		6			

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Performance Measure/ Indicator		Audit -or	--- Indicate Only One ---				OFI
			C	EXR	Maj	Min	
12.3	<i>Program Participants with forest management responsibilities on public lands shall participate in the development of public land planning and management processes.</i>	RH, KS, JK MF, DV		6			
12.3.1	Involvement in public land planning and management activities with appropriate governmental entities and the public.	KS, JK		6			
12.3.2	Appropriate contact with local stakeholders over forest management issues through state, provincial, federal, or independent collaboration.	KS, JK		6			
12.4	<i>Program Participants with forest management responsibilities on public lands shall confer with affected indigenous peoples.</i>	KS, JK, JS, RH	6				
12.4.1	Program that includes communicating with affected indigenous peoples to enable Program Participants to a. understand and respect traditional forest related knowledge; b. identify and protect spiritually, historically, or culturally important sites; and c. address the sustainable use of nontimber forest products of value to indigenous peoples in areas where Program Participants have management responsibilities on public lands.	KS, JK, JS, RH	6				6
12.5	<i>Program Participants shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees, the public, or Program Participants regarding practices that appear inconsistent with the SFI Standard principles and objectives.</i>	MF			6		
12.5.1	Support for SFI Implementation Committee efforts (toll-free numbers and other efforts) to address concerns about apparent nonconforming practices.	MF			6		
12.5.2	Process to receive and respond to public inquiries.	MF				6	
12.6	<i>Program Participants shall report annually to the SFI Program on their compliance with the SFI Standard.</i>	MF					
12.6.1*	Prompt response to the SFI annual progress report. (*Note: This indicator will be reviewed in all audits.)				6		
12.6.2	Recordkeeping for all the categories of information needed for SFI annual progress reports.		6				
12.6.3	Maintenance of copies of past reports to document progress and improvements to demonstrate conformance to the SFI Standard	N.A.					

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**Objective 13: To promote continual improvement in the practice of sustainable forestry and monitor, measure, and report performance in achieving the commitment to sustainable forestry.**

Performance Measure/ Indicator		Audit -or	- - - Indicate Only One - - -				OFI
			C	EXR	Maj	Min	
13.1*	<i>Program Participants shall establish a management review system to examine findings and progress in implementing the SFI Standard, to make appropriate improvements in programs, and to inform their employees of changes. (*This Performance Measure will be reviewed in all audits.)</i>	MF			6		
13.1.1	System to review commitments, programs, and procedures to evaluate effectiveness.	MF		6			
13.1.2	System for collecting, reviewing, and reporting information to management regarding progress in achieving SFI Standard objectives and performance measures.	MF			6		
13.1.3	Annual review of progress by management and determination of changes and improvements necessary to continually improve SFI conformance.	MF			6		

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**Auditor Notes****Definitions and Abbreviations**

MHNF: Mt. Hood National Forest

NW: Northwest Forest Plan - Record of Decision for Amendments to Forest Service and BLM Planning Documents Within the Range of the Northern Spotted Owl; Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl

RD: Record of Decision for Amendments to Forest Service and BLM Planning Documents Within the Range of the Northern Spotted Owl

SCC: “Table S-1 - Summary Comparison Chart (by Fiscal Year)” found in the “Monitoring and Evaluation Report, Mt. Hood National Forest Land and Resource Management Plan, FY 2005 (or 2004)”

EA: Environmental Assessment

Requirement	Notes
1.1	<p><i>Program Participants shall ensure that long-term harvest levels are sustainable and consistent with appropriate growth and-yield models and written plans.</i></p> <p><u>Major Gap:</u> Ample evidence was provided that the harvest levels are well below planned levels. In addition to the harmful economic effects, delays in implementing needed treatments are having ecological impacts including reduced tree vigor and lost opportunities to implement habitat improvements. Evidence for the gap is provided under indicator 1.1.2</p>
1.1.1	<p>“A long-term resource analysis to guide forest management planning at a level appropriate to the size and scale of the operation, including: a. periodic or ongoing forest inventory; b. a land classification system; c. soils inventory and maps, where available; d. access to growth-and-yield modeling capabilities; e. up-to-date maps or a geographic information system (GIS); f. recommended sustainable harvest levels; and g. a review of nontimber issues (e.g., pilot projects and economic incentive programs to promote water protection, carbon storage, or biological diversity conservation).”</p> <p>Conformance was determined for sub-indicators a. through g. based on an extensive review of planning documents. Key documents reviewed included:</p> <ul style="list-style-type: none"> <li>• Land and Resource Management Plan, Mt. Hood National Forest, 1990: Note that amendments to the plan are made as needed. For example, reviewed “Mt. Hood National Forest Plan Amendment #7 – White River National Wild and Scenic River Management Plan” necessitated by changes from the Northwest Forest Plan</li> <li>• Monitoring and Evaluation Report, Mt. Hood National Forest Land and Resource Management Plan, FY 2004, and FY 2005</li> <li>• Record of Decision for Amendments to Forest Service and BLM Planning Documents Within the Range of the Northern Spotted Owl; Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl</li> <li>• Reconciliation Document, MHNF 1990 Plan and Northwest Forest Plan</li> <li>• Mt. Hood National Forest Strategic Stewardship Plan and Success Stories: Weaving Together the Environment, People, and the Economy, 2006</li> <li>• Citizen Stewardship &amp; Mt. Hood National Forest: Executive Summary, April 06</li> <li>• Northwest Forest Plan—the first 10 years (1994–2003): socioeconomic monitoring results. Gen. Tech. Rep. PNW-GTR 649. Portland, OR: U.S. Department of Agriculture, Forest Service, Pacific Northwest Research Station.</li> <li>• “Base Programs – Forest Niche – District Niche” 04.30.04 3 page document that lists Forest Service programs here and describes those niches where the forest or particular districts serve unique roles, providing added value. This strategic document helps with decisions about which projects to bring forward and about which unit or units will take the lead in program deployment</li> <li>• Various Watershed Assessments, Late Seral Reserve Reports, Environmental Assessments, EIS, and Decision Letters.</li> </ul> <p>Completed Analyses are found on the Mt. Hood National Forest website <a href="http://www.fs.fed.us/r6/mthood/publications/">http://www.fs.fed.us/r6/mthood/publications/</a> or the Regional Ecosystem Office website <a href="http://www.reo.gov">http://www.reo.gov</a>. The Reconciliation Document not available on the internet.</p>

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1.1.2	<p>“Documentation of annual harvest trends in relation to ... forest management plan.”</p> <p><u>Major Gap</u></p> <ul style="list-style-type: none"> <li>• Meets the indicator as written, as harvest trends are documented “in relation to” the plan. Ample evidence was provided that the harvest levels are well below planned levels, and this led to the finding of a Major Gap at the Performance Measure Level (see Performance Measure 1.1 above).</li> <li>• 1990 Plan (since revised by President’s NW Forest Plan) authorized offering 189 million board feet (MMBF)/year from 389,000 acres Allowable Sale Quantity (ASQ). This was adjusted downward to a Probable Sale Quantity (PSQ) of 69 MMBF, then 64 MMBF, based on the plan amendment driven by the adoption of the ROD.</li> <li>• Table S-1 Summary Comparison Chart (by Fiscal Year) page 18 of the Monitoring and Evaluation Report, Mt. Hood National Forest Land and Resource Management Plan, FY 2005 provides percentage of timber offered vs. planned ASQ and PSQ. PSQ is the more appropriate metric: FY00- 0%; FY01-14%; FY02- 46%; FY03 – 40%; FY04 – 8%; FY05 – 34.6%</li> <li>• Mt. Hood National Forest Volume Summary Excel spreadsheet and graph showing for FY 1994 to 2005 the volumes “Offered”, “Awarded”, “Harvested”, compared to PSQ and Budgeted Levels. Volumes actually offered have been less than half of the PSQ (of 64 MMBF) since 2000</li> <li>• A major study of the issue of timber supply reliability for all forests covered by the Northwest Forest Plan is excerpted:  <i>“Were predictable levels of timber and nontimber resources produced during the first decade of the Northwest Forest Plan (the Plan)? The answer ... differs by resource area. The amount of timber produced did not meet the probable sale quantity (PSQ) volumes anticipated during the first decade of the Plan, nor were timber sales offered at predictable levels. The average annual PSQ estimate for the first 9 years of the Plan (1995–2003) was 776 million board feet, taking into account the downward adjustments made to PSQ during that period, and the expectation that production would be under PSQ in the first 2 years. On average, about 526 million board feet of timber was offered for sale each year between 1995 and 2003. The average annual PSQ volume produced was about 421 million board feet. Timber sale levels were reasonably predictable between 1995 and 1998; between 1999 and 2003 they were not. The PSQ estimates were based on the expectation that most of the harvest volume would come from regeneration harvest of old forest stands in matrix and some adaptive management areas. This harvest expectation was not met. The Forest Ecosystem Management Assessment Team (FEMAT 1993) report acknowledged that it would be difficult to produce a predictable supply of timber under the Plan...</i>  <i>Socioeconomic well-being increased for more than a third of the communities in the region, and decreased for about the same number between 1990 and 2000...</i>  <i>The expectation that the Plan would provide predictable levels of resource outputs and recreation opportunities, which would in turn provide predictable levels of employment, was not achieved with respect to timber supply. The timber projections for FS and BLM lands in the Plan area were not realized and there was a lot of variation across the years since the Plan was implemented. However, increased harvests from other ownerships and the redirection of logs from the export market to local processing industries have mitigated some of these impacts.”</i> Source: Northwest Forest Plan—the first 10 years (1994–2003): socioeconomic monitoring results. Gen. Tech. Rep. PNW-GTR 649.</li> </ul>
1.1.3, 1.1.4	<p>“A forest inventory system and a method to calculate growth.”</p> <p>“Periodic updates of inventory and recalculation of planned harvests.”</p> <ul style="list-style-type: none"> <li>• For many years Mt. Hood National Forest used 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. There should be adequate plot numbers to provide reliable information for the land allocation categories under the Northwest Forest Plan. The previous inventory was completed in 1996; now on schedule for the 10-year update, might take an extra year to process data so might be completed in 2007.</li> <li>• Both the old CVS and new FIA-based Continuous forest inventory (CFI) cover 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> </ul>

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	<ul style="list-style-type: none"> <li>• Stands with proposed treatments are inventoried as part of the planning process to determine stocking, species composition, and stand structure. This stand examination data is based on a small number of plots, and the low number of plots may be affecting the precision of silvicultural decisions in some cases.</li> <li>• Reviewed “Inventory Projections for Selected National Forests” compiled from forest vegetation inventory and summarized in this report in response to a congressional demand. These were driven by harvest, growth, and mortality</li> <li>• Remote sensing and other data collection and analysis methods are used to develop risk assessment maps annually that incorporate fuel loading and forest health information (Fire Regime Condition Class system)</li> <li>• There are many other resources that are inventoried or monitored. For example, 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 Region 6 Monitoring Budget may be cut by \$3million which is at least a 20% cut.</li> <li>• Planned harvest levels (PSQ) were adjusted following adoption of Northwest Forest Plan (see 1.1.2 above).</li> </ul>
1.1.5	<p>Documentation of forest practices (e.g., planting, fertilization, and thinning) consistent with assumptions in harvest plans.</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• In 2005, harvest occurred on 2,525 acres, with the majority of the harvest occurring on lands designated as timber emphasis (C1) in the Mt Hood Forest Plan and matrix lands in the Northwest Forest Plan, with a small percent in riparian reserves. Commercial thinning accounted for 91% of the acres treated and shelterwood harvest accounted for 9%. Pre-commercial thinning (PCT) was accomplished on 2,052 acres on the Forest. There is a backlog of 19,000 acres of PCT, but harvest plans don’t assume certain levels of PCT.</li> <li>• This indicator is not applicable. The phrase “assumptions in harvest plans” within the indicator was interpreted to involve silvicultural treatments that drive the calculation of the long-term harvest levels. There was no allowable cut effect in the overall growth and annual allowable harvest calculations referenced in 1.1.4 above, which is no longer treated as a goal but instead is a maximum. Instead, the team attempted to assess the intent of the indicator given the current management context. For future pilot studies or possible actual certification assessments a revised indicator might be more appropriate. Current harvests are conducted as projects, which are derived from watershed assessments and which are designed in the framework of ecosystem management. Harvest plans include descriptions of follow-up treatments, often including pre-commercial treatments (hand felling of trees or slashing /grinding of trees) and underburns. Certification field audit during September, 2006 indicated follow up treatments are conducted.</li> <li>• Precommercial thinning (PCT) is not keeping up with plan. On the east-side 300 to 900 acres are accomplished each year, but the need is 1,800 acres per year.</li> </ul>
2.1	<p><b><i>Program Participants shall reforest after final harvest, unless delayed for site-specific environmental or forest health considerations, through artificial regeneration within two years or two planting seasons, or by planned natural regeneration methods within five years.</i></b></p>
2.1.1	<p>“Designation of all management units for either natural or artificial regeneration.”</p> <ul style="list-style-type: none"> <li>• Document review confirmed that this indicator is met. The planning and execution of vegetation management treatments requires a prescription signed by a Certified Silviculturist. Details of the prescription (planting or natural regeneration) are documented and must be complete before any regeneration harvest is started.</li> </ul>
2.1.2	<p>“Clear Requirements to judge adequate regeneration and appropriate actions to correct under-stocked areas and achieve desired species composition and stocking rates for both artificial and natural regeneration”</p> <ul style="list-style-type: none"> <li>• Confirmed during certification field audit September, 2006. Prescriptions described in 2.1.1 above include planting density, thresholds for additional action, species appropriate to the site, and proportions of species. Stocking surveys are conducted at years 1 and 3, and additional surveys can be commissioned as needed. Plantations must be certified as successful. Survey results are reported to managers annually.</li> <li>• Survival has been over 80%; mostly using container stock</li> </ul>

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2.1.3	<p>“Minimized plantings of exotic tree species and research documentation that exotic tree species, planted operationally, pose minimal risk.”</p> <ul style="list-style-type: none"> <li>• <b>Exceeds the Requirement:</b> The Mt. Hood National Forest does not plant exotic species.</li> </ul>
2.1.4	<p>“Protection of desirable or planned advanced natural regeneration during harvest.”</p> <ul style="list-style-type: none"> <li>• There is limited use of natural regeneration at this time, as the current timber program emphasis is on thinning, not regeneration treatments. One site seen during certification field audit was a salvage project. Observations at sites visited that all desirable trees, including desirable young trees, are protected during treatments.</li> </ul>
2.1.5	<p>“Artificial reforestation programs that consider potential ecological impacts of a different species or species mix from that which was harvested.”</p> <ul style="list-style-type: none"> <li>• Composition and structure goals are driving silvicultural decisions, and a thorough multi-disciplinary analysis is conducted for every silvicultural treatment, as mandated by National Environmental Policy Act (NEPA) and confirmed by review of EAs for all sales visited and other sales not visited. There is documented invasion by white fir into east-side stands where it is not well-adapted and where it contributes to forest health and fire protection problems described elsewhere in this matrix. See Indicator 2.4.2.</li> <li>• When dictated by Mountain Pine Beetle infestations, different species are planted to minimize beetle and mistletoe.</li> </ul>
2.2	<p><b><i>Program Participants shall minimize chemical use required to achieve management objectives while protecting employees, neighbors, the public and the forest environment.</i></b></p>
2.2.1	<p>“Minimized chemical use required to achieve management objectives.”</p> <ul style="list-style-type: none"> <li>• <b>Exceeds the Requirement:</b> Chemicals are only used for noxious weed control, and are not used in normal silviculture. These chemicals have proven to be more effective than mechanical treatment or hand-pulling.</li> </ul>
2.2.4	<p>“Use of Integrated Pest Management where feasible.”</p> <ul style="list-style-type: none"> <li>• The IPM approach was confirmed by interviews and review of documents. The overall vegetation management strategy and the invasive pest approach start with avoiding situations where herbicides are needed.</li> </ul>
2.2.5	<p>“Supervision of forest chemical applications by state-trained or certified applicators.”</p> <ul style="list-style-type: none"> <li>• Licensed specialists are used in the application of chemicals; rely on county and state agencies to do the work.</li> </ul>
2.2.2,	<p>“Use of least toxic and narrowest spectrum pesticide narrowest spectrum and least toxic pesticides necessary to achieve management objective.”</p>
2.2.3,	<p>“Use of pesticides registered for the intended use and applied in accordance with the label requirements.”</p>
2.2.6	<p>“Use of best management practices appropriate to the situation; for example ...”</p> <ul style="list-style-type: none"> <li>• The Forest Service Northwest Region uses multiple layers of caution for Risk Reduction Methods integrated into herbicide use. These include: <ul style="list-style-type: none"> <li>➢ System for adhering to federal laws, Environmental Protection Agency (EPA) approved label requirements, and advisories includes written prescriptions and stringent contractual provisions, with contract administrators trained to ensure compliance;</li> <li>➢ Risk assessments analyzed hazards of worst case situations and informed the Region 6 Toxicity Levels of concern policy;</li> <li>➢ Region 6 Record of Decision and other Forest Plan Management Direction provide for further reductions in use or environmental protections;</li> <li>➢ Use of treatment methods customized to site and other local conditions;</li> <li>➢ Other project design criteria (e.g., untreated buffers);</li> <li>➢ Compliance monitoring; and</li> <li>➢ Adaptive management as indicated by monitoring results.</li> </ul> </li> </ul>
2.3	<p><b><i>Program Participants shall implement management practices to protect and maintain forest and soil productivity.</i></b></p>
2.3.1	<p>“Use of soils maps where available.”</p> <ul style="list-style-type: none"> <li>• Soil maps are contained in the GIS and are used for all planning; soil type, texture, rock content in soil all used by specialists to design harvest specifications.</li> <li>• Interpretations have also been put into the GIS to facilitate GIS analysis</li> </ul>

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2.3.2	<p>“Process to identify soils vulnerable to compaction and use of appropriate methods to avoid excessive soil disturbance.”</p> <ul style="list-style-type: none"> <li>• Soil scientists provide input into the design of all harvest proposals and consider soil stability.</li> <li>• Each proposed land-altering activity has a customized set of BMPs that include seasonal restrictions where appropriate.</li> <li>• Watershed analysis identifies areas that have risk of landslide and other potential sources of sediment. For example, in the Collowash Watershed Analysis Map of Management Related Sediment Regime these are identified: Culvert Stream Crossing, High Sediment Production Sites, Roadways on Unstable Landforms, and Harvest Related Slump or Slide.</li> </ul>
2.3.3	<p>“Use of erosion control measures to minimize the loss of soil and site productivity.”</p> <ul style="list-style-type: none"> <li>• Confirmed by field observations at all sites visited.</li> <li>• 15% of site is the maximum of soils that can be compacted</li> <li>• Ripping is utilized as needed</li> <li>• Waterbars and seeding</li> </ul>
2.3.4	<p>“Post-harvest conditions conducive to maintaining site productivity (e.g., limited rutting, retained down woody debris, minimized skid trails).”</p> <ul style="list-style-type: none"> <li>• Confirmed by field observations at all sites visited.</li> <li>• Skid trails are widely spaced; not much rutting was observed.</li> <li>• Post-harvest ripping of skid roads was done in some areas visited.</li> </ul>
2.3.5	<p>“Retention of vigorous trees during partial harvesting, consistent with silvicultural norms for the area.”</p> <ul style="list-style-type: none"> <li>• Confirmed by field observations at all sites visited.</li> <li>• PCT is not keeping up with plan. On the east-side 300 to 900 acres are accomplished each year, but the need is 1,800 acres per year.</li> <li>• Designation by Description (DbyD) not as strong at leaving only the best trees, but is a practical approach given the staffing levels and the backlog of thinning needed.</li> <li>• Observed excessive damage to residual trees at several field sites, including bole damage at the top of thinning corridors.</li> </ul> <p>OFI: There is an opportunity to improve the protection of residual trees during partial harvests.</p>
2.3.6	<p>“Criteria that address harvesting and site preparation to protect soil productivity.”</p> <ul style="list-style-type: none"> <li>• BMPs, Standards and Guidelines exist and their implementation is routinely monitored. “General Best Management Practices for the Mt. Hood National Forest – August 2004”.</li> <li>• Confirmed that monitoring reports include soil aspects.</li> <li>• Soil scientist is out on the site whenever there is ground skidding.</li> <li>• Most harvest sites have customized soil impact criteria, generally based on the percentage of the site disturbed. Some sites have seasonal restrictions, such as “log on snow only”.</li> </ul>
2.3.7	<p>“Minimized road construction to meet management objectives efficiently.”</p> <p><u>Major Gap:</u> The current road system does not match management needs, as it was designed for a time when timber harvest levels were nearly ten times current levels. Many existing roads are not needed because of changed management direction. Road maintenance funding is not adequate to maintain the current transportation system, and there are clear signs that the road system is starting to suffer from lack of funds for regular grading, ditch maintenance, or upgrades.</p> <ul style="list-style-type: none"> <li>• At this time riparian resources are well protected, but the team has serious concerns about a pending roads crisis, from lack of road maintenance unless additional resources are made available for road maintenance, upgrades, or decommissioning.</li> <li>• Reviewed <i>Mt. Hood National Forest Roads Analysis, 2003</i> <ul style="list-style-type: none"> <li>○ “This document and associated maps are prepared in response to a document titled, “Roads Analysis: Informing Decisions about Managing the National Forest Transportation System,” August 1999 (FS-643). The process of Roads Analysis has actually been evolving on the Mt. Hood National Forest (Forest) for many years. The process began with Watershed Analysis in the mid 90s and it was further developed by the Forest-level Access and Travel Management Plan (ATM) that was completed in 1999. This document is a synthesis of new analysis and existing data and analysis that have already been completed. This analysis covers the entire Mt. Hood National Forest road system.”</li> <li>○ “The Forest currently manages approximately 3450 miles of roads. Not included in this total are the 410 miles of roads that have been decommissioned in the past decade.”</li> </ul> </li> </ul>

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	<ul style="list-style-type: none"> <li>• According to staff interviews about half of this road system is no longer needed. This road system does not match management needs, as it was designed for a time when timber harvest levels were nearly ten times current levels. Many existing roads are not needed because of changed management direction. These problems are considered systematic.</li> <li>• Road maintenance budget is currently slightly under \$1million for a 3,450 mile system. Peak funding was greater than \$3million (road system is 3450 of 3860 of peak). Although much of the main stem system is paved (implying lower maintenance costs until the pavement needs repaving) this is clearly insufficient funding. Various Forest Service personnel indicated that “road maintenance funding is not adequate to maintain the current transportation system”. For example, there is far less grading than in the past.</li> <li>• The team observed an extremely well designed and constructed road system that is starting to show signs of minimized maintenance, with less roadside mowing, ditch maintenance, and grading. Observed some gravel roads with road surface damage (rutting, potholes, concentrated water flows and loss of surface material) due to lack of grading.</li> <li>• Although stream crossings are generally well maintained, some 400 barriers to resident fish have been identified (the team observed one of these). Also we were told that there are only 4 remaining barriers to anadromous fish. Considering that the Forest has over three thousand miles of road on over one million acres this level of fish passage is very good.</li> <li>• Reviewed the Bull Run Watershed Road Decommissioning Project, observing a superbly designed and executed strategy for de-roading this area which has long been restricted from public use.</li> <li>• Forest Service has not yet done public involvement or NEPA process for decisions or strategy for other road closures; there are widely divergent views among the public</li> <li>• Forest Service staff told auditors the following: “Everywhere that we operate, east or west, our roads have been so overgrown with brush ...; the sub grade of paved roads is not maintained...; modified and inefficient routes to access timber harvest and vegetation treatment areas are used because of closed crossings or paved main stem roads that are no longer able to sustain heavy log truck traffic...”</li> </ul>
2.4	<p><b><i>Program Participants shall manage so as to protect forests from damaging agents such as environmentally or economically undesirable wildfire, pests and diseases to maintain and improve long-term forest health, productivity and economic viability.</i></b></p>
2.4.1	<p>“Program to protect forests from damaging agents.”</p> <ul style="list-style-type: none"> <li>• Fire Regime Condition Class (FRCC) system: Condition Class (CC) 1 Normal; CC 2 Modest Departure; CC 3 High Departure Stand level mapping “pre-protocol” is in use but a better system is being developed</li> <li>• An effort to update the fire regime condition classes, forest vegetation, and fuels data and mapping using standardized protocol developed in 2004 is continuing; <ul style="list-style-type: none"> <li>Step 1: provides the reference condition based on biophysical setting</li> <li>Step 2: current conditions from 1996 satellite imagery from IMAP translated into FRCC Seral Stages (five stages)</li> <li>Step 3: Compared reference conditions with current conditions to find departures</li> <li>Step 4: Compare to fire frequency and severity at 4<sup>th</sup> field watershed level; last 40 years fire history and fire severity from expert opinion from fire experts</li> </ul> </li> </ul>
2.4.2	<p>“Management to promote healthy and productive forest conditions to minimize susceptibility to damaging agents.”</p> <p><b>Major Gap:</b> Many of the stands in the Forest are overstocked, leading to high risk of uncharacteristically severe, stand-replacing wildfire or insect infestation. The audit team was not provided convincing evidence of a plan (including a timeline and resources needed) to address this overstocking and restore forest health.</p> <ul style="list-style-type: none"> <li>• According to 2005 Monitoring Report Mortality exceeds harvest by factor of 8 to 1; growth exceeds harvest by 13 to 1.</li> <li>• On Matrix lands mortality exceeds harvest by about 2 to 1; growth to harvest is 3.7 to 1.</li> <li>• Field observations and insect maps (“Cumulative Insect Caused Mortality 2001-2005”) confirm building beetle infestations, currently Mountain Pine Beetle in Lodgepole pine, later perhaps other insects and perhaps in Douglas-fir. By the end of 2005 87,000 acres had been affected adversely by insects; by the end of 2006 this is expected to exceed 100,000 acres (almost 10% of the forest).</li> <li>• Some positive examples of thinning in Lodgepole to prevent loss of total stand and planned joint</li> </ul>

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	<p>firebreak with the Confederated Tribes of Warm Springs (CTWS) on the Cascade Crest.</p> <ul style="list-style-type: none"> <li>• In 2005 the MHNH completed hazardous fuel treatment of 1,327 acres, 90% of which were in Wildland-Urban Interface (WUI); staff said that the need on the east-side was to do 2,000 acres per year.</li> <li>• PCT was accomplished on 2,052 acres on the Forest.</li> <li>• “Current and potential future forest health issues continue to be a concern on the Forest. This includes a backlog of 19,000 overly dense, young stands in need of pre-commercial thinning; large acreages of changed ecological conditions on the eastside as a result of fire suppression and increasing levels of insect damage and mortality. Recommendations are for more thinning to improve stand conditions in both the pre-commercial and commercial size classes.” “Monitoring and Evaluation Report, Mt. Hood National Forest Land and Resource Management Plan, FY 05”</li> <li>• On adjacent private and tribal lands the main focus of many foresters is on maintaining healthy forest conditions for timber; stakeholders stated that public lands might need to also rate the need to preserve adjacent private timber when making decisions regarding treating unhealthy stands.</li> <li>• Concerns were expressed by stakeholders regarding “thousands of acres of dead and dying trees (... needing restoration treatments) near the Warm Springs Indian Reservation.</li> </ul>
2.4.3	<p>“Participation in, and support of, fire and pest prevention and control programs.”</p> <ul style="list-style-type: none"> <li>• The lead auditors observed the operations of “expanded dispatch” in the main room of the supervisor’s office during scoping, and interviewed one of the senior managers. This group was managing fire control activities associated with two active fire complexes on the forest.</li> <li>• Field visits, documents, and interviews confirmed an active fuels management program, largely operating on the east-side. There the focus is on restoring forest areas that have missed at least one fire cycle and are unstable.</li> <li>• Troutdale Air Tanker Base is owned by Mt. Hood National Forest. Formerly a major tanker reload facility (a capability that remains) it is now available for staging helicopters and other firefighting equipment or operations.</li> <li>• Mt. Hood National Forest belongs to the Mid-Columbia Fire Prevention Cooperative and the Mt. Hood Fire Prevention Cooperative, two groups involved in fire prevention education. Also is assisting (GIS support for example) Clackamas, Hood River, and Wasco Counties develop Community Wildland Fire Protection Plans. The Mt. Hood National Forest also supports fire prevention planning with individual communities (example Sportsman’s Park, Wamic, Oregon).</li> <li>• Forest Restoration and Fuels Management Memorandum of Understanding (MOU) between the Federated Tribes of the Warm Springs, the Forest Service, and Bureau of Land Management (BLM) for treating fuels by committing the FS and BLM to offer residual biomass from 8,000 acres per year to fuel a proposed biomass facility.</li> </ul>
2.5	<p><b><i>Program Participants that utilize genetically improved planting stock including those derived through biotechnology shall use sound scientific methods and follow all applicable laws and other internationally applicable protocols.</i></b></p>
2.5.1	<p>“Program for appropriate research, testing, evaluation and deployment of genetically improved planting stock including trees derived through biotechnology.”</p> <ul style="list-style-type: none"> <li>• “Mt. Hood National Forest Genetic Resources Plan 1996” describes the tree improvement program in genetic resource conservation terms. Goals include conserving natural genetic variation and diversity, producing genetically selected plant materials for reforestation and restoration, and incorporating genetics into programs using native species.</li> <li>• Interview with Reforestation Forester on east-side of Cascades confirmed the program is still in place, although planting levels are much lower than in the past. Seed has been tested for progeny growth, form, and, for Western White Pine seed, rust resistance.</li> <li>• Seed improvement program is now producing second generation seed for some species. Process involves selection of parent trees with desired traits, seed collection, development of seed orchards, evaluation of families, roguing of orchard, and collection of improved seed (first generation). Some second generation seed is now available from controlled crosses between best individuals/families.</li> <li>• There is no use of Genetically Modified Organisms or other gene-altering processes.</li> </ul>
3.1	<p><b><i>Program Participants shall meet or exceed all applicable federal, provincial, state and local water quality laws and meet or exceed Best Management Practices developed under Environmental Protection Agency (EPA)-approved state water quality programs other applicable federal, provincial, state or local</i></b></p>

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	<p><b>programs.</b></p> <ul style="list-style-type: none"> <li>Confirmed by field observations at all sites visited.</li> </ul>
3.1.1	<p>“Program to implement state or provincial equivalent BMPs during all phases of management activities.”</p> <ul style="list-style-type: none"> <li>MHNF projects use BMPs from “General Best Management Practices for the Mt. Hood National Forest – August 2004”</li> <li>Under NEPA all projects must incorporate monitoring of impacts, and all projects which could impact riparian resources include provisions for mitigating sediment and temperature effects on streams. Environmental Impact Statements (EIS) may disclose impacts to the riparian resources, including sediment and temperature, to the public.</li> <li>Professional staff includes hydrologists, fisheries biologists, soil scientists, and geologists, all of whom are involved in working to minimize or prevent erosion and sedimentation.</li> <li>This staff develops a customized program for each project. For example, on the Bull Run Road Project there are customized specifications for all work, with a particular focus on removed stream crossings (slope and seeding specifications were reviewed), monitoring in streams for effects (minor turbidity increase following the first major storm, then no effect), and a long-term monitoring process. Most harvest sites have customized soil impact criteria, generally based on the percentage of the site disturbed.</li> <li>OFI: There is an opportunity to improve in the regular implementation of road grading. Further, interviews and a review of budget levels suggest that follow-up annual surveillance audits (which would only be done if the Forest Service formally engages in forest certification) would likely find additional issues with road-related BMPs.</li> </ul>
3.1.2	<p>“Contract provisions that specify BMP compliance.”</p> <ul style="list-style-type: none"> <li>Confirmed that BMP provisions for erosion and sediment control are included in all harvesting and road-building contracts (in “Part C”). For example, the South Fork Thinning Project has specialized BMPs for Timber Harvesting (ground-based harvesting, helicopter, cable, and landings) Roads, Watershed Management, and Fuels Management.</li> </ul>
3.1.3	<p>“Plans that address wet weather events (e.g., inventory systems, wet weather tracts, defining acceptable operational conditions, etc.).”</p> <ul style="list-style-type: none"> <li>Each proposed land-altering activity has a customized set of BMPs that include seasonal restrictions where appropriate. For example, the proposed 2007 Plantation Thinning would allow “no operation of off-road ground-based equipment... between Nov.1 and May 31”. This can be waived if soils are dry or frozen</li> </ul>
3.1.4	<p>“Monitoring of overall BMP implementation.”</p> <ul style="list-style-type: none"> <li>Timber sale administrators monitor harvests regularly for contract compliance, including provisions for BMPs. They are supported in this monitoring by soil scientists, fisheries biologists, and hydrologists as appropriate</li> <li>Under NEPA all projects must incorporate monitoring of impacts, which often includes sediment and temperature effects on streams. 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> <li>There is also a forest wide monitoring plan.</li> <li>Monitoring includes measurements of infiltration rates pre- and post-harvest.</li> </ul>
3.2	<p><b><i>Program Participant shall have or develop, implement, and document, riparian protection measures based on soil type, terrain, vegetation and other applicable factors.</i></b></p>
3.2.1	<p>“Program addressing management and protection of streams, lakes and other water bodies and riparian zones.”</p> <ul style="list-style-type: none"> <li>Northwest Forest Plan Aquatic Management Strategy mandates forest wide standards for riparian protection in the form of overlay requirements (which take precedence over other standards and guidelines).</li> <li>Mt. Hood National Forest has staff Fisheries Biologists, Hydrologists, and Soil Scientists who</li> </ul>

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	<p>help to plan all projects.</p> <ul style="list-style-type: none"> <li>• All projects reviewed (documents and/or field sites) contained extensive, customized provisions for riparian protection. In the field the team confirmed the use of riparian zones for fish-bearing streams that are based on two site-potential trees on each side, and within which any work must maintain or enhance riparian habitat. As an example of allowable work, some thinning might be allowed to grow big trees faster because streams are currently generally deficient in coarse woody debris (important for debris dams that create fish habitat).</li> <li>• Observed and discussed some sites where the interagency approval process led to extremely conservative and expensive riparian protection decisions (for example the use of skyline logging to cross a very small intermittent stream that had been crossed in the past).</li> </ul>
3.2.2	<p>“Mapping of streams, lakes and other water bodies and riparian zones, and where appropriate, identification on the ground.”</p> <ul style="list-style-type: none"> <li>• Confirmed that riparian boundaries are marked on the ground by field observations during the readiness review.</li> </ul>
3.2.3	<p>“Implementation of plans to manage or protect streams, lakes and other water bodies.”</p> <ul style="list-style-type: none"> <li>• Confirmed by interviews and field observations at all sites visited.</li> </ul>
3.2.4	<p>“Identification and protection of nonforested wetlands, including bogs, fens, vernal pools and marshes of significant size.”</p> <ul style="list-style-type: none"> <li>• Confirmed by field observations.</li> <li>• Watershed Analysis reports include maps of non-forested wetlands. For example, Collowash Watershed Analysis Map of Wet Areas includes: Pond or Lake, Moist or Wet Meadow, Sitka Alder Wetland, Shrub Wetland, Red Alder Wetland.</li> <li>• Maps developed through remote sensing show these areas.</li> <li>• Project planning identifies and protects non-forested wetlands, including down to a very small size.</li> </ul>
3.2.5	<p>“Where regulations or BMPs do not currently exist to protect riparian areas, use of experts to identify appropriate protection measures.”</p> <ul style="list-style-type: none"> <li>• Regulations and BMPs do exist to protect riparian areas.</li> </ul>
<b>4.1</b>	<b><i>Program participants shall have programs to promote biological diversity at stand- and landscape-scales.</i></b>
4.1.1	<p>Program to promote the conservation of native biological diversity, including species, wildlife habitats, and ecological or natural community types, at stand and landscape levels.</p> <ul style="list-style-type: none"> <li>• A significant portion of the forest is in protected areas in the form of LSR designed to preserve ecosystem functions for late successional forests is an effective biodiversity strategy given the context of the western Cascade Mountains.</li> <li>• Ramsey Creek watershed restoration projects following floods of 1996 and 1997 is a good example of a plan at the sub-watershed level.</li> <li>• All Watershed Analyses and Late Successional Reserve Assessments are posted under publications on the Mt. Hood website. <a href="http://www.fs.fed.us/r6/mthood/publications/">http://www.fs.fed.us/r6/mthood/publications/</a></li> <li>• Jeanne Rice, Forest Ecologist provided information on Fire Regime Condition Class.</li> <li>• Most resource employees attended an Environmental Effects Training earlier this spring.</li> <li>• The Forest Plan had a habitat management emphasis on Spotted Owl, Pileated Woodpecker, and Pine Martin (plan for maintaining habitat for 66/96/231 pairs respectively: <ul style="list-style-type: none"> <li>○ Pileated Woodpecker and Pine Martin are dependent on mature conifers</li> <li>○ 96 habitat areas of at least 300 acres each for pileated woodpeckers;</li> <li>○ 231 habitat areas of at least 160 acres each for pine martin</li> </ul> </li> </ul> <p>The decision was made that martin and woodpecker habitat are well-provided for under the current amended plan.</p> <ul style="list-style-type: none"> <li>• 1990 Land and Resource Management Plan (Forest Plan) describes Key Site Riparian Management Areas, General Riparian Management Areas, and Special Emphasis Watershed Management Areas.</li> <li>• Management provisions from the Forest Plan exist for Elk, Deer, Silver Grey Squirrel, and</li> </ul>

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	<p>Merriam’s Turkey [uncertain whether plans are being implemented for these species]</p> <ul style="list-style-type: none"> <li>• Indicator species approach is utilized, facilitating biodiversity planning at larger spatial scales.</li> <li>• Current Forest Plan focuses on late-seral forest habitats. This approach, when combined with the lack of implementation of planned treatments, the program to put out fires quickly (few acres reach “stand replacement” levels), and the decision not to attempt regeneration projects at this time has caused the team to have concerns about early seral habitat and associated species and biodiversity issues relating to early seral species.</li> <li>• Monitoring report discusses landscape role of MHNF.</li> </ul>
4.1.2	<p>“Program to protect threatened and endangered species.”</p> <p><u>Exceeds the Requirement: Protections for threatened and endangered species are exceptional.</u></p> <ul style="list-style-type: none"> <li>• Peregrine falcon, Bald Eagle, Spotted Owl have significant provisions in the Forest Plan</li> <li>• “Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species Within the Range of the Northern Spotted Owl” provides exemplary protections and provisions, with most of the Forest off-limits to or severely restricted for harvesting in order to develop habitat for late seral and/or old growth species (the plans “allow silvicultural activities in late-successional reserves when those activities will enhance late-successional conditions”); protections for other species within the Matrix forest management areas (44 % of the Mt. Hood National Forest) see page C-45 of the Northwest Forest Plan.</li> <li>• There is a comprehensive regional species list with guidance</li> <li>• Sensitive Plant Program: Under the Survey and Manage provision requires botanist to walk every proposed site. When plants on the list are found it gets buffered to ensure that plants do not become threatened or endangered by Forest Service action</li> </ul>
4.1.3	<p>“Plans to locate and protect known sites associated with viable occurrences of critically imperiled and imperiled species and communities. Plans for protection may be developed independently or collaboratively and may include Program Participant management, cooperation with other stakeholders, or use of easements, conservation land sales, exchanges, or other conservation strategies”</p> <p><u>Exceeds the Requirement:</u> The Forest Service goes well beyond protection of known sites to devote considerable resources to expanding information about rare, threatened, and vulnerable species and communities with local or regional importance.</p> <ul style="list-style-type: none"> <li>• Several field sites confirmed the strong aquatic protection and restoration programs on the Forest, associated with listed anadromous fish. Restoration projects are clearly a very high priority on the Mt. Hood National Forest.</li> </ul>
4.1.4	<p>“Development and implementation of criteria, as guided by regionally appropriate science, for retention of stand-level wildlife habitat elements (e.g., snags, mast trees, down woody debris, den trees, nest trees).”</p> <p><u>Exceeds the Requirement:</u> The Forest Service has developed and implemented provisions for an impressive array of stand-level habitat elements including coarse woody debris, green trees, snags, old-growth fragments, and sites used as bat roosts.</p> <ul style="list-style-type: none"> <li>• “Standards and Guidelines for Management of Habitat for Late-Successional and Old-Growth Forest Related Species within the Range of the Northern Spotted Owl” for Matrix Lands: <ul style="list-style-type: none"> <li>➢ Coarse Woody Debris provisions (page C-40): “renewable supply of large down logs well distributed across landscape... 240 linear feet per acre in logs &gt; 20 inches dbh... cwd already on the ground should be retained and protected... down logs should be left within forest patches retained under green tree retention</li> <li>➢ Green tree and snag retention (page C-41): “retain at least 15 percent of the area associated with each cutting unit... 70 percent of the retained area in aggregates 0.2 to 1 hectare or larger... rest dispersed... snagged retained within the harvest unit at levels sufficient to support species of cavity-nesting birds at 40 percent of potential population levels... snag management (favored) within areas of green tree retention...”</li> <li>➢ “Provide additional protection for caves, mines, and abandoned wooden bridges and buildings that are used as roost sites for bats.”</li> <li>➢ “Provide for retention of old-growth fragments in watershed where little remain.”</li> </ul> </li> <li>• Confirmed by field observations</li> </ul>

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4.1.5	<p>“Assessment, conducted individually or collaboratively, of forest cover types and habitats at the individual ownership level and, where credible data are available, across the landscape, and incorporation of findings into planning and management activities, where practical and when consistent with management objectives.”</p> <p><u>Exceeds the Requirement:</u> The Northwest Forest Plan provides a sterling example of such landscape-scale planning.</p> <ul style="list-style-type: none"> <li>• Comprehensive watershed assessments have been completed for the entire forest</li> <li>• Field staff interviewed stated that they use these assessments to help formulate and plan projects; watershed recommendations are implemented, and this implementation is routinely considered by the regulatory agencies</li> <li>• All LSRs (approximately 35% of Forest) have had similar assessments completed</li> <li>• Mt. Hood National Forest participates actively in the Northwest Oregon Ecology Group (with the Willamette National Forest, the Siuslaw National Forest, and the Bureau of Land Management) that is working co-operatively to get ready for plan revision. Focus is on large-scale assessments and tools that can widely inform management including: <ul style="list-style-type: none"> <li>○ Vegetation typing</li> <li>○ Historic patterns for oak-pine types</li> <li>○ Fire regime condition classes</li> <li>○ Successional pathways</li> <li>○ IMAP Project (mapping)</li> <li>○ DECAid (deadwood analysis)</li> <li>○ Other special habitats (e.g. Whitebark Pine)</li> </ul> </li> </ul>
4.1.6	<p>“Support of and participation in plans or programs for the conservation of old-growth forests in the region of ownership.”</p> <p><u>Exceeds the Requirement:</u> Old growth protections are a significant driver of the Northwest Forest Plan; further, standards and guidelines for protection of old growth were also contained in the forest plan.</p>
4.1.7	<p>“Participation in programs and demonstration of activities as appropriate to limit the introduction, impact, and spread of invasive exotic plants and animals that directly threaten or are likely to threaten native plant and animal communities.”</p> <p>From Mt. Hood National Forest Projects and Plans website for 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></p> <p><u>Exceeds the Requirement:</u> Plans are being developed (with considerable implementation underway) for comprehensive and site-specific invasive plant treatments on a large portion of the problem areas on the Mt. Hood National Forest.</p> <ul style="list-style-type: none"> <li>• Reviewed 565 acres of noxious weeds that were treated on the MHNF in 2005</li> <li>• “Site-Specific Invasive Plant Treatments The Mt. Hood National Forest and Columbia River Gorge National Scenic Area in Oregon are proposing treatment on 208 sites (approximately 13,000 acres). The purpose of this project is to reverse the negative impacts caused by the invasive plants and to restore ecological communities and function at the impacted treatment sites in a cost-effective manner that meets current management direction. The establishment and spread of invasive plants can be slowed, with timely action.” The document is available at: <a href="http://www.fs.fed.us/r6/invasiveplant-eis/site-specific/MTH/">http://www.fs.fed.us/r6/invasiveplant-eis/site-specific/MTH/</a>”</li> <li>• Same document, <i>APPENDIX A: Standards from Preventing and Managing Invasive Plant Record of Decision</i>: “The following standards and implementation guide are taken from Pacific Northwest Region Invasive Plant Program: Preventing and Managing Invasive Plants Record of Decision, page A-3 to A-8 (USDA Forest Service, 2005b).” 18-20 standards are listed which are to apply to assessments, analysis documents, contracts, or permits (as appropriate to the standard in question) signed on or after March 1, 2006.</li> <li>• Interviews confirmed staff knowledge of Standard 2 from ROD described above: <ul style="list-style-type: none"> <li>➢ “Actions conducted or authorized by written permit by the Forest Service that will operate outside the limits of the road prism (including public works and service contracts), require the cleaning of all heavy equipment (bulldozers, skidders, graders,</li> </ul> </li> </ul>

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	<p>backhoes, dump trucks, etc.) prior to entering National Forest System Lands.</p> <ul style="list-style-type: none"> <li>➤ This standard does not apply to initial attack of wildland fires, and other emergency situations where cleaning would delay response time.</li> <li>➤ This standard will apply to permits and contracts issued after March 1, 2006. Ongoing permits/contracts issued before this date may be amended, but are not required to be amended, to meet this standard.</li> <li>➤ This standard will apply to Forest Service force account operations starting March 1, 2006</li> </ul>
4.1.8	<p>Program to incorporate the role of prescribed or natural fire where appropriate.</p> <ul style="list-style-type: none"> <li>• Funding limits the use of prescribed fire to less than half of the annual need, but due to Wildland Urban Interface (WUI), CE, and Collaborative planning the amount of burning seems to be on the increase.</li> <li>• OF:I There is an opportunity to improve by increasing the use of prescribed fire.</li> </ul>
4.2	<p><b><i>Program Participants shall apply knowledge gained through research, science, technology, and field experience to manage wildlife habitat and contribute to the conservation of biological diversity.</i></b></p> <ul style="list-style-type: none"> <li>• The process for the development of the Northwest Forest Plan included a robust process for implementing science in the management of the forests.</li> </ul>
4.2.1	<p>“Collection of information on critically imperiled and imperiled species and communities and other biodiversity-related data through forest inventory processes, mapping, or participation in external programs, such as NatureServe, state or provincial heritage programs, or other credible systems. Such participation may include providing nonproprietary scientific information, time, and assistance by staff, or in-kind or direct financial support.”</p> <ul style="list-style-type: none"> <li>• There are many monitoring efforts of habitats, fish, surveys, rare plant surveys at project level (wildlife program.)</li> <li>• Collaboration with the Oregon Department of Fish and Wildlife (ODF&amp;W) to share data such as fish populations, and habitat data is responsive to this indicator.</li> <li>• Wildlife biologists and botanists dialog with other agencies for rare plants and big game animals, furthering the sharing of information and leading to better habitat management.</li> </ul>
4.2.2	<p>“A methodology to incorporate research results and field applications of biodiversity and ecosystem research into forest management decisions.”</p> <ul style="list-style-type: none"> <li>• Watershed analysis and field experience of managers are used to modify practices. For example, the Collowash Watershed Analysis stated “Firewood cutting seems to have contributed to the low availability of large down logs in recent harvest units. Far fewer decks are available for cutting than in the past and firewood gatherers have been observed far into harvest units in flat areas.” Managers have responded by making provisions to pile some excess wood roadside as part of fuels treatment, to help mitigate this issue.</li> </ul>
5.1	<p><b><i>Program Participants shall manage the impact of harvesting on visual quality.</i></b></p>
5.1.1	<p>“Program to address visual quality management.”</p> <ul style="list-style-type: none"> <li>• The Mt. Hood National Forest uses the “Visual Management System” to manage for visual quality. The system involves classifying landscapes according to their natural variety and public sensitivity. Five different visual quality levels have been developed, with all portions of the Forest allocated to one of these levels.</li> </ul>
5.1.2	<p>“Incorporation of aesthetic considerations in harvesting, road, landing design and management, and other management activities where visual impacts are a concern.”</p> <ul style="list-style-type: none"> <li>• Confirmed the effective management of visual concerns by field observations at all sites visited.</li> <li>• Trails are classified as Class 1 (higher priority for protection) or Class 2; more extensive buffers are required for Class 1, including an inner no-cut. Discussed the use of this system on the Eight Mile Salvage and confirmed the 75 foot buffer is mapped on the sale map and it protects the trail.</li> </ul>
5.2	<p><b><i>Program Participants shall manage the size, shape, and placement of clearcut harvests.</i></b></p> <p>This Performance Measure and the two underlying Indicators are not applicable because the Forest is not employing clearcuts at this time (shelterwood harvests and retention harvests leave sufficient residual forest in clumped and dispersed trees that the management of the remaining “gaps” is not possible or necessary).</p>
5.2.1	<p>Average size of clearcut harvest areas does not exceed 120 acres, except when necessary to “respond to forest health emergencies or other natural catastrophes.”</p> <ul style="list-style-type: none"> <li>• Mt. Hood National Forest does not use clearcuts. There is very limited use of regeneration treatments that could be classified as extended shelterwood. Example: Tarzan sale, where the</li> </ul>

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	<p>15% retention rule (5% in patches, 10% dispersed) led to the appearance of a shelterwood or seed-tree harvest.</p> <ul style="list-style-type: none"> <li>Confirmed by review of documents and by field observations that there are few regeneration treatments, and those that are done are divided into harvest units far smaller than 120 acres. Policy is that clearcut size in Douglas-fir types not exceed 60 acres, and in mixed types not exceed 40 acres.</li> <li>Clearcuts utilize such large amounts of retention (15%) that they do not really appear as clearcuts.</li> </ul>
5.2.2	<p>Documentation through internal records of clearcut size and the process for calculating average size.</p> <ul style="list-style-type: none"> <li>Records exist for clearcuts, and a GIS exists which would facilitate such calculations. These calculations are not needed at this time because maximum clearcut size is lower than the limit for average size.</li> </ul>
5.3	<b><i>Program Participants shall adopt a green-up requirement or alternative methods that provide for visual quality.</i></b>
5.3.1, 5.3.2	<p>“Program implementing the green-up requirement or alternative methods.”</p> <p>“Trees in clearcut harvest areas are at least 3 years old or 5 feet high at the desired level of stocking before adjacent areas are clearcut...”</p> <ul style="list-style-type: none"> <li>Although the Mt. Hood National Forest currently does not use clearcutting (see 5.2 above) the audit team evaluated “green-up” provisions for regeneration treatments.</li> <li>Certified silviculturists must certify each regeneration area as being successfully regenerated before adjacent areas are regenerated. Requirements are: <ul style="list-style-type: none"> <li>➢ Regeneration is at least 4.5 feet tall;</li> <li>➢ Stocking standards are met; and</li> <li>➢ Desirable species are free to grow.</li> </ul> </li> </ul>
5.3.2	<p>“Harvest area tracking system to demonstrate compliance with the green-up requirement or alternative methods.”</p> <ul style="list-style-type: none"> <li>Records are kept of all harvests, including paper file and GIS system.</li> </ul>
6.1.	<b><i>Program Participants shall identify special sites and manage them in a manner appropriate for their unique features.</i></b>
6.1.1	<p>“Use of existing natural heritage data and expert advice in identifying or selecting sites for protection because of their ecologically, geologically, historically, or culturally important qualities.”</p> <p><u>Exceeds the Requirement:</u> Efforts to locate special sites are superb.</p> <ul style="list-style-type: none"> <li>Archeologists are employed to locate and identify special sites of historic or cultural concern and to develop recommendations for protection.</li> <li>Biologists, botanists, geologists, hydrologists, fisheries specialists, and others review all proposed projects and make recommendations for protections.</li> <li>Extensive tribal consultation is employed, in part to locate sites of tribal interest for protection.</li> <li>Special emphasis is placed on treaty rights</li> </ul>
6.1.2	<p>“Appropriate mapping, cataloging, and management of identified special sites.”</p> <p><u>Exceeds the Requirement:</u> Efforts to manage and protect special sites and lands are exemplary.</p> <ul style="list-style-type: none"> <li>The Forest Plan, page Four- “By the end of the first decade, a comprehensive cultural resources management plan will be written to ... guide the inventory, evaluation, protection, and enhancement of the Forest’s cultural resources.”</li> </ul> <p>This was completed in a variety of manners:</p> <ul style="list-style-type: none"> <li>○ Programmatic agreements with regional plans in Washington and Oregon in conjunction with the respective <b>State Historic Preservation Offices (SHPO)</b></li> <li>○ 1994 field inventory data, and 2004 update data, are maintained</li> <li>○ Site-specific “cultural resources reviews” are done by specialists for all project proposals, adding to the database and ensuring protections when projects do get implemented.</li> </ul>
7.1	<b><i>Program Participants shall employ appropriate forest harvesting technology and “in-woods” manufacturing processes and practices to minimize waste and ensure efficient utilization of harvested trees, where consistent with other SFI Standard objectives.</i></b>

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7.1.1	<p>“Program or monitoring system to ensure efficient utilization, which may include...”</p> <ul style="list-style-type: none"> <li>• Barlow Ranger District project to utilize roadside hazard trees for fuelwood after they are felled by professional tree fellers.</li> <li>• Confirmed very good utilization by field observations; 6-inch top for saw logs and 4-inch top for pulp material is the standard, but one sale on east-side there was a 3-inch top specification.</li> <li>• Confirmed the existence of a special forest products program that manages harvest of boughs, mushrooms, berries, bear grass, posts and poles, transplants, etc.</li> </ul>
9.1	<p><b><i>Program Participants shall individually, through cooperative efforts, or through associations provide in-kind support or funding, in addition to that generated through taxes, for forest research to improve the health, productivity, and management of forest resources.</i></b></p>
9.1.1	<p>“Current financial or in-kind support of research to address questions of relevance in the region of operations. The research will include ...”</p> <ul style="list-style-type: none"> <li>• The Forest Service has a separate research branch that conducts research into all of the listed subjects. Confirmed Mt. Hood National Forest supports such research by designating Research Natural Areas and by providing sites for research and assisting in some of the work.</li> </ul>
9.2	<p><b><i>Program Participants shall individually, through cooperative efforts, or through associations develop or use state, provincial, or regional analyses in support of their sustainable forestry programs.</i></b></p>
9.2.1	<p>“Participation, individually or through cooperative efforts or associations at the state, provincial, or regional level, in the development or use of a. regeneration assessments; b. growth-and-drain assessments; c. BMP implementation and compliance; and d. biodiversity conservation information for family forest owners.”</p> <ul style="list-style-type: none"> <li>• (Note: Letters below correspond to letters of the indicator.)</li> <li>• A. and B. are met through Forest Service’s Forest Inventory and Analysis (FIA) program.</li> <li>• C. FS in the east funds BMP monitoring. Hydrologist has analyzed the 1999 EA and the effectiveness provisions to prepare for the 2006 EA; 14 different recommendations are listed.</li> <li>• D. Not applicable - Forest Service has a separate State and Private Forestry Program to provide such assistance. A related issue, the forest coordinates its weed control issues with counties, Resource Advisory Council (RAC), Lake County Weed Control.</li> </ul>
10.1	<p><b><i>Program Participants shall require appropriate training of personnel and contractors so that they are competent to fulfill their responsibilities under the SFI Standard.</i></b></p>
10.1.1, 10.1.2	<p>“Written statement of commitment to the SFI Standard communicated throughout the organization, particularly to mill and woodland managers, wood procurement staff, and field foresters.”</p> <p>“Assignment and understanding of roles and responsibilities for achieving SFI objectives”</p> <p><b>Major Gap:</b> Mt. Hood National Forest has not committed to implementing the SFI Standard. Land managers and specialists have not received specific assignments for implementation of SFI requirements.</p>
10.1.3	<p>“Staff education and training sufficient to their roles and responsibilities.”</p> <ul style="list-style-type: none"> <li>• Interviews indicated that Forest Service personnel are very well educated, trained, and talented</li> </ul>
10.1.4	<p>“Contractor education and training sufficient to their roles and responsibilities.”</p> <p><b>Major Gap:</b> There is no skill, training, or experience requirement for timber harvesters.</p> <ul style="list-style-type: none"> <li>• One harvesting contractor interviewed during readiness review had safety and professional logger training, but this is not required by the Forest Service.</li> <li>• Fire contractors must prove their credentials. Other types of service contractors are beginning to include the ability to look at past performance, and consider training claims (performance-based contracting). This is becoming a new priority, as the Mt. Hood National Forest moves towards</li> </ul>

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	more and more restoration contracting. Employees do not have primary responsibility for contractor safety, but can comment or refer situations to staff safety specialists. Safety provisions are part of all contracts, and in bid forms.
<b>10.2</b>	<b><i>Program Participants shall work closely with state logging or forestry associations, or appropriate agencies or others in the forestry community, to foster improvement in the professionalism of wood producers.</i></b>
10.2.1 12.1.1, 12.2.1, and 12.5.1	<p>“Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producers’ training courses...”</p> <p>“Support for efforts of SFI Implementation Committees.”</p> <p>“Support for the SFI Implementation Committee program to address outreach, education, and technical assistance (e.g., toll-free numbers, public sector technical assistance programs).”</p> <p>“Support for SFI Implementation Committee efforts (toll-free numbers and other efforts) to address concerns about apparent nonconforming practices.”</p> <p>Note: 10.2.1, 12.1.1, 12.2.1, and 12.5.1 all relate to SFI Implementation Committee activities.</p> <p><u>Major Gap:</u> These indicators involve SFI-specific activities that would be expected to occur in concert with the SFI Implementation Committee. The Mt. Hood National Forest has not committed to the SFI Program and employees are not involved in supporting the efforts of the Oregon SIC at this time.</p>
<b>11.1</b>	<b><i>Program Participants shall take appropriate steps to comply with applicable federal, provincial, state, and local forestry and related environmental laws and regulations.</i></b>
11.1.1	<p>“Access to relevant laws and regulations in appropriate locations.”</p> <ul style="list-style-type: none"> <li>Confirmed that all relevant laws and regulations are available on Forest Service web sites, and are updated regularly.</li> </ul>
11.1.2	<p>“System to achieve compliance with applicable federal, provincial, state, or local laws and regulations.”</p> <p><i>Record of Decision for Amendments to Forest Service and BLM Planning Documents Within the Range of the Northern Spotted Owl</i> page 28: “It (Alternative 9, the basis for the current management program in the Pacific Northwest) meets the requirement of the National Forest Management Act (NFMA). Endangered Species Act (ESA), Federal Land Policy &amp; Management Act (FLP&amp;MA) and the Oregon and California Lands Act.”</p> <ul style="list-style-type: none"> <li>NEPA process is followed for all actions, including vegetation management and any significant activity.</li> <li>Confirmed Mt. Hood National Forest employs Environmental Coordinators at Ranger District and forest-wide levels to ensure that laws and regulations are complied with. The focus of this work is on compliance with the NEPA process, but compliance with all regulations and laws is included.</li> <li>Reviewed many types of planning documents confirming legal reviews are integrated into project planning. Examples include the “Decision Memo- Sportsman’s Park Hazardous Fuels Reduction Project” sections “Findings Required by Other Laws” and “Consistency with Regulatory Framework”; and “Environmental Assessment – 2007 Plantation Thinning”</li> </ul>
11.1.3	<p>“Demonstration of commitment to legal compliance through available regulatory action information.”</p> <ul style="list-style-type: none"> <li>The Forest Service is frequently sued, nearly always in relation to the NEPA. Currently there are 5 lawsuits, 4 involving timber sales.</li> <li>According to Gary Larson, Forest Supervisor the frequency of lawsuits is because “there is not agreement in society of the fundamental purposes of public lands”. He also stated “we follow the law to the best of our ability, the best that we understand it”. The Forest Service contends that most lawsuits are intended to get clear resolution as to what the law means. In practice the agency works by trying something they believe to be legal; if litigated and they lose the agency then adjusts rapidly so they don’t lose again.</li> <li>The audit team carefully considered the supervisor’s views, the evidence available, and the SFI requirements for compliance. The team concluded that the intent is clearly to comply with laws</li> </ul>

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	<p>and regulations, and that the Mt. Hood National Forest is clearly in conformance with this requirement.</p> <ul style="list-style-type: none"> <li>• Permits under Sections 401/404 of the Clean Water Act and Oregon Division of State Lands are obtained; the Forest has a good regulatory record.</li> <li>• Biologists and fish biologists are on first name basis with National Oceanic and Atmospheric Administration (NOAA) Fisheries and U.S. Fish and Wildlife Service (FWS). There are no reports of regulatory concerns.</li> </ul>
11.1.4	<p>“Adherence to all applicable federal, state, &amp; provincial regulations and international protocols for research &amp; deployment of trees derived from improved planting stock &amp; biotechnology.”</p> <ul style="list-style-type: none"> <li>• Tree improvement program for western white pine blister rust is in place.</li> <li>• Do not periodically cycle back in wild genetic resources.</li> </ul>
<b>11.2</b>	<p><b><i>Program Participants shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state, and local levels in the country in which the Program Participant operates.</i></b></p>
11.2.1	<p>“Written policy demonstrating commitment to comply with social laws, such as those covering civil rights, equal employment opportunities, antidiscrimination and anti-harassment measures, workers’ compensation, indigenous peoples’ rights, workers’ and communities’ right to know, prevailing wages, workers’ right to organize, and occupational health and safety.”</p> <ul style="list-style-type: none"> <li>• A national policy directive was issued from the Chief of the Forest Service providing specific direction for the protection of the rights and safety of migrant workers.</li> <li>• The Forest Service is obligated by federal law to comply with all of the laws listed above.</li> </ul>
<b>12.1</b>	<p><b><i>Program Participants shall support and promote efforts by consulting foresters, state and federal agencies, state or local groups, professional societies, and the American Tree Farm System® and other landowner cooperative programs to apply principles of sustainable forest management.</i></b></p>
12.1.2	<p>“Support for the development and distribution of educational materials, including information packets for use with forest landowners.”</p> <ul style="list-style-type: none"> <li>• “Wilderness Stewardship Program” 1 page fact sheet describes the formal program for training volunteer “field stewards” for promoting wilderness values and protection measures.</li> <li>• Community wildfire protection plans; what landowners might do to mitigate around their own land.</li> <li>• Much of the budget for protection of fish habitat is spent on private lands (Wyden amendment allows public dollars to be spent on private lands).</li> <li>• Pacific Northwest State and Private Forestry has been reduced, and rural community assistance programs have been significantly reduced.</li> </ul>
12.1.3	<p>“Support for the development and distribution of regional or statewide information materials that provide landowners with practical approaches for addressing biological diversity issues, such as specific wildlife habitat, critically imperiled or imperiled species, and threatened and endangered species.”</p> <ul style="list-style-type: none"> <li>• Abundant written material is provided at ranger stations on wildlife species, noxious weeds, etc.</li> <li>• Supervisor’s Office Information sheets and other written information is extensive and readily available.</li> </ul>
12.1.4	<p>“Participation in efforts to support or promote conservation of working forests through voluntary market-based incentive programs (e.g., current-use taxation programs, Forest Legacy, or conservation easements).”</p> <ul style="list-style-type: none"> <li>• The Forest Service is the lead agency for the legacy program.</li> </ul>
12.1.5	<p>“Program Participants are knowledgeable about credible regional conservation planning and priority-setting efforts that include a broad range of stakeholders. Consider the results of these efforts in planning where practical and consistent with management objectives.”</p> <ul style="list-style-type: none"> <li>• Staff are well-versed in the Northwest Forest Plan. The majority of the projects on the Forest are based on the plan, and designed in accordance with its guidance and direction. The Mt. Hood National Forest produced “Reconciliation Document: Mt. Hood Forest Plan / Northwest Forest Plan” to ensure that the activities and plans are consistent with the NW Forest Plan.</li> </ul>

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	<ul style="list-style-type: none"> <li>• The forest participates in recovery plans for threatened and endangered species.</li> <li>• The forest’s demonstrated strengths in outreach and collaboration help ensure strong connections between conservation actions on the Forest and those occurring on the outside.</li> </ul>
12.2	<b><i>Program Participants shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education, and involvement related to forest management.</i></b>
12.2.2	<p>“Periodic educational opportunities promoting sustainable forestry, such as ...”</p> <p><u>Exceeds the Requirement:</u> The Forest Service, through its State and Private Forestry Program is a leader in these efforts, and Mt. Hood National Forest personnel contribute to these efforts on the unit and within their communities.</p> <ul style="list-style-type: none"> <li>• Mt. Hood National Forest produces one-page fact sheets called “Success Stories” that describe various aspects of forestry, conservation, and multiple-use land management. These are linked to the stewardship plan document. Topics covered include monitoring, the Salmon Watch® program, fire education watershed management interpretation of historic and cultural areas, and various aspects of Forest Service operations. These are distributed to the public.</li> <li>• Stewardship contracts allow forest workers to learn and participate in new forms of forest work designed to improve forests. Staff make efforts to promote these opportunities with local workers.</li> <li>• The forest was one site for the LUCID Project, a test of Montreal Process Criteria and Indicators. The project was conducted in ways that resulted in increased public knowledge regarding forestry.</li> <li>• The most tangible result of the LUCID project is the revamping of the annual “Monitoring and Evaluation Report, Mt. Hood National Forest Land and Resource Management Plan,” which is required by the NFMA. This clearly written document is a valuable tool for public education and involvement in the forest.</li> <li>• School groups are routinely involved with Forest Service staff during visits; several exemplary education programs operate within the forest. One example is Cascade Streamwatch at Wildwood Recreation Site, in cooperation with the BLM and Wolfree, Inc.; over 4,000 students per year have participated in recent years. Another example is the Kiwanis Camp for Developmentally Disabled.</li> </ul>
12.2.3	<p>“Recreation opportunities for the public, where consistent with forest management objectives.”</p> <ul style="list-style-type: none"> <li>• Mt. Hood National Forest <u>exceeds the requirements</u> in recreation, providing a plethora of recreational uses and activities throughout most portions of the Forest. A range of recreational opportunities is provided on the Mt. Hood National Forest: wildlife viewing, walking, hiking, climbing, driving for pleasure, downhill skiing, viewing natural features, whitewater rafting, 554 recreational residences on leased lands in the Zigzag Ranger District, The current forest map lists 132 recreation facilities, while the 1990 Mt. Hood National Forest Plan refers to 152 facilities with a capacity of over 3 million recreation visitor days (RVD) per year (in 1983 developed sites recorded about 1.5 million RVDs).</li> <li>• The team visited several recreation areas including the Ramona Trailhead and Government Camp Trails, Trillium Lake Campground, and Timberline Lodge.</li> <li>• The Forest is making effective use of “public-private partnerships” including expanded use of concessions and work with local interest groups organized around particular recreation sites.</li> </ul>
12.3	<p><b><i>Program Participants with forest management responsibilities on public lands shall participate in the development of public land planning and management processes.</i></b></p> <p><u>Exceeds the Requirement:</u> The Mt. Hood National Forest has impressive outreach efforts for all land management decisions, including numerous exemplary collaborations with citizen groups. This Forest is an outstanding model for successful public involvement.</p>
12.3.1	<p>“Involvement in public land planning and management activities with appropriate governmental entities and the public.”</p> <ul style="list-style-type: none"> <li>• The NEPA process includes many opportunities for public involvement; on the Mt. Hood National Forest there is a clear emphasis on making maximum positive use of these opportunities to understand various publics, to explain management challenges, and to explore alternatives so as to make good decisions.</li> <li>• “Citizen Stewardship and Mt. Hood National Forest - Executive Summary, April 2006” reviews the role of National Forests and the goals and roles Mt. Hood National Forest within the national and regional goals, challenges, and areas for emphasis; encourages citizen participation; and</li> </ul>

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	<p>provides contacts for citizens to become involved.</p> <ul style="list-style-type: none"> <li>• In 2003 the Forest provided leadership in the commissioning of a neutral assessment of the possibilities for building a “community of recreational interests in and around the Mt. Hood National Forest”. The report, “Mt. Hood Recreation Stakeholder Assessment Report and Recommendations” and its spin-offs have guided strategic thinking and activities since that time. The approach is grounded in public involvement.</li> <li>• The Bull Run Watershed is co-administered by the Forest Service in cooperation with the Portland Water Bureau based on a draft MOU.</li> <li>• Sandy River Basin Agreement Partnership includes the Mt. Hood National Forest and 13 other agencies and organizations working together for fish habitat restoration and for recovery of listed fish species. 160 habitat restoration opportunities have been identified and work is starting on implementation.</li> <li>• Mt. Hood National Forest actively seeks to expand its citizen partnerships. An example is the effort to stimulate the creation of a “Friends of Bonney Butte” organization for stewardship of an important site for studying and watching raptors.</li> </ul>
12.3.2	“Appropriate contact with local stakeholders over forest management issues through state, provincial, federal, or independent collaboration.”
<b>12.4</b>	<b><i>Program Participants with forest management responsibilities on public lands shall confer with affected indigenous peoples.</i></b>
12.4.1	<p>“Program that includes communicating with affected indigenous peoples to enable Program Participants to</p> <ol style="list-style-type: none"> <li>understand and respect traditional forest related knowledge;</li> <li>identify and protect spiritually, historically, or culturally important sites; and</li> <li>address the sustainable use of nontimber forest products of value to indigenous peoples in areas where Program Participants have management responsibilities on public lands.”</li> </ol> <ul style="list-style-type: none"> <li>• Indian tribes have treaty rights (guarantees) to take anadromous fish from the Columbia River System; confirmed “November 6, 200 Executive Order: Consultation and Coordination with Indian Tribal Governments” ordering a range of government to government relationships with Indian tribes including recognition of the unique legal relationship between the US and the tribes, the right of self-government, and support for tribal sovereignty and self-determination, and a requirement that all federal agencies have a process for meaningful and timely input from tribes in the development of regulations that have tribal implication.</li> <li>• Reviewed excerpts from “Treaty with the Tribes of Middle Oregon, 1855”</li> <li>• Reviewed mimeo “Special Forest Products and the Gathering Right and Interest of American Indians” dated 1.15.96 from Regional Office provided as background information of line officer and staff. This approach is still followed.</li> <li>• American Indian Religious Freedom Act provides rights to sites for religious and ceremonial purposes.</li> <li>• Mt. Hood National Forest has a 1997 MOU with the Confederated Tribes of the Warm Springs Reservation for managing huckleberry resources. There is an active “First Foods” program.</li> <li>• Forest and tribe affairs are based on the principle of “government to government” relations as described in the “Memorandum of Understanding between The Confederated Tribes of the Warm Springs Reservation of Oregon and USDA Forest Service: Pacific Northwest Region (and 8 forests, including MHNF); Bureau of Land Management: Oregon State Office; Bureau of Indian Affairs: Warm Springs Agency - For the Purpose of Providing a Framework for Government-to-Government Consultation and Collaboration On Resource Management Plans, Proposals, Actions, and Policies and to Make a Statement of Mutual Benefits and Interests”. This document includes provisions for: <ul style="list-style-type: none"> <li>○ Working Relationship (excerpts; letters related to sub-indicator requirements above)</li> <li>○ B. Routine consultation between Agencies and the Tribes early in natural resource planning, and during implementation and monitoring of federal Agency programs to build and enhance a mutual partnership; and</li> <li>○ C. Routine coordination between the Tribes and applicable Agencies through face-to-face regularly scheduled meetings, project scoping, and written correspondence, when policies, program recommendation and/or other sovereign actions undertaken by the</li> </ul> </li> </ul>

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	<p>Tribal government affect lands and natural resources administered by the Agencies.</p> <ul style="list-style-type: none"> <li>○ D. Routine coordination between Agencies and the Tribes through face-to-face regularly scheduled meetings, project scoping and written correspondence, when policies, program recommendations, and/or actions undertaken by the Agencies affect lands and natural resources of interest to the Tribal government.</li> <li>○ E. Agency and Tribal staff collaboration such that full and due consideration is given Tribal rights and interests; and so that common Tribal and Agency goals are better recognized and achieved in the planning and implementation of projects.</li> <li>○ Collaboration on Natural Resource Planning and Decision-making; and</li> <li>○ Monitoring</li> <li>○ Cooperative Activities; and</li> <li>○ Implementation</li> </ul> <ul style="list-style-type: none"> <li>● Discussed “Harmony Workshops” where selected forest staff spend a week at Warm Springs at the CTWS</li> <li>● Most professionals have limited knowledge of traditional on-the-ground special environmental tribal knowledge.</li> <li>● 8.16.2006 letter from CTWS: “The Olallie Butte forest Health Project represents a truly collaborative effort between the Tribes and Mt. Hood National Forest.” This project is part of Cascade Crest Forest Health Improvement Project.</li> <li>● MOU of 1.25.06 CTWS, Forest Service, and BLM treatment of 8,000 acres per year of federal managed lands within central Oregon “in the spirit of the Healthy Forest Restoration Act and the Tribal Forests Protection Act” (Memorandum of Understanding between The Confederated Tribes of the Warm Springs Reservation of Oregon and USDA Forest Service: Pacific Northwest Region {and 8 forests, including MHNF}; Bureau of Land Management: Oregon State Office; Bureau of Indian Affairs: Warm Springs Agency, For the Purpose of Providing a Framework for Government-to-Government Consultation and Collaboration On Resource Management Plans, Proposals, Actions, and Policies and to Make a Statement of Mutual Benefits and Interests)</li> <li>● <u>OFI</u>: There is an opportunity to improve by exploring opportunities for contacting a broader range of tribes.</li> </ul>
12.5	<b><i>Program Participants shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees, the public, or Program Participants regarding practices that appear inconsistent with the SFI Standard principles and objectives.</i></b>
12.5.2	<p>“Process to receive and respond to public inquiries.”</p> <ul style="list-style-type: none"> <li>● The Mt. Hood National Forest is superb at working with the public. An extensive array of communications and involvement activities were described by Forest staff and by stakeholders.</li> </ul>
12.6	<b><i>Program Participants shall report annually to the SFI Program on their compliance with the SFI Standard.</i></b>
12.6.1*	<p>“Prompt response to the SFI annual progress report.”</p> <p><u>Major Gap</u>: Mt. Hood National Forest or Forest Service are not currently SFI Program Participants and thus do not participate in the SFI survey nor report annual to the SFI Program on compliance with the standard. All Program Participants receive a survey each year from American Forest &amp; Paper Association (AF&amp;PA) regarding a range of forest management and outreach activities. These surveys are reviewed as part of all SFI Audits. For a copy of the 2005 Survey for see <a href="http://www.aboutsfi.org/">http://www.aboutsfi.org/</a>.</p>
12.6.2	<p>“Recordkeeping for all the categories of information needed for SFI annual progress reports.”</p> <ul style="list-style-type: none"> <li>● The Forest Service systems for record-keeping are superb and well-documented.</li> </ul>
12.6.3	<p>“Maintenance of copies of past reports to document progress and improvements to demonstrate conformance to the SFI Standard.”</p> <ul style="list-style-type: none"> <li>● MHNF is not an SFI Program Participant, so past reports would not be expected to exist.</li> </ul>
13.1*	<b><i>Program Participants shall establish a management review system to examine findings and progress in implementing the SFI Standard, to make appropriate improvements in programs, and to inform their employees of changes.</i></b>

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13.1.1	<p>“System to review commitments, programs, and procedures to evaluate effectiveness.”</p> <p><u>Exceeds the Requirement:</u> Mt. Hood National Forest has a robust, comprehensive, and effective monitoring program.</p> <ul style="list-style-type: none"> <li>• The annual “Monitoring and Evaluation Report, Mt. Hood National Forest Land and Resource Management Plan” is well-written and provides useful basis for management review. Because the Forest has not engaged in SFI certification the report does not directly include SFI issues, but most of the report’s content applies to the SFI requirements.</li> </ul>
13.1.2 13.1.3	<p>“System for collecting, reviewing, and reporting information to management regarding progress in achieving SFI Standard objectives and performance measures.”</p> <p>“Annual review of progress by management and determination of changes and improvements necessary to continually improve SFI conformance.”</p> <p><u>Major Gap:</u> Mt. Hood National Forest is not currently an SFI Program Participant, and thus has not developed a system for reviewing SFI-specific requirements, reporting information to management regarding progress in achieving SFI Standard objectives and performance measures, or to assess changes and improvements necessary to continually improve their SFI Program.</p> <ul style="list-style-type: none"> <li>• As the Forest has not adopted the SFI Standard the team initially considered the overall management system to place this indicator in context. The Mt. Hood National Forest has a variety of methods to review programs and projects, including regular reviews at the ranger station, Forest, regional, and national levels. Monitoring programs are well-developed, cover a variety of resources including wildlife and fish populations, stream, riparian zone, soils, grazing impacts, and others. All forests in the National Forest System must implement an Environmental Management System before they can finalize their new forest plans, which for the Mt. Hood National Forest will result in an EMS by 2009 or sooner. Environmental monitoring programs on the Forest have ramped up recently, with data collection well ahead of analysis, and implementation monitoring further advanced than effectiveness monitoring. These monitoring programs are a critical part of the movement towards a fully-functioning adaptive management approach, which, when implemented, will further support the Forest Service’s strengths in (internal) management review. The SFI-specific requirements are not included in the management review system.</li> <li>• Systematic program reviews, likely conducted at higher administrative levels, might serve to identify inefficiencies and streamline processes. On this Forest it is clear that staffing has been significantly downsized, but there has not been a parallel effort to downsize processes. For example, there are three distinct levels of authority for each timber sale (sale administrator, Forest Service representative, and contracting officer), each with its own processes, career ladder, training, etc. This approach was designed in a past era with none of the modern tools currently widely employed such as communications, computing, and remote-sensing technology, and when timber values and harvest rates were far higher in proportion to overall Forest Service operations.</li> </ul>