



Tuesday, June 9, 2015

Dear Mr. Vandling,

Thank-you for taking the time to host my evaluation of your 2014/2015 timber harvest activities on May 27th. This annual evaluation is an important part of the Forest Stewardship Council (FSC) certification process as my organization is responsible for ensuring compliance with the FSC standards for each of the certified members in our group. This correspondence serves both as a summary of my findings during the evaluation, and provides commentary on your ongoing forest management activities.

During my two-hour evaluation, we visited recent and past harvest units in both Forest Management Unit's (FMUs) 4 & 19 at Camp Bonneville, as well as the current harvest taking place at Green Mountain. At each site I observed exemplary timber harvest practices that minimized both soil disturbance and impacts to residual timber. Further, each timber harvest practice was consistent with the long-term objectives of your forest management plans. Clark County continues to meet or exceed the high standards of the FSC, and in so doing provides an instructive example of both long-term economically viable and environmentally sustainable forest management practices.

What follows are observations from my field visit and review of your forest management program:

FSC Indicator	FSC Standard	Observation
Indicator 4.1.e	The forest owner or manager provides work opportunities to qualified local applicants and seeks opportunities for purchasing local goods and services of equal price and quality.	Clark County continues to support local businesses through the hiring of local logging and road contractors.
Indicator 4.1.f	Commensurate with the size and scale of operation, the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management.	Clark County continues to provide public tours of past and present forest management activities.
Indicator 5.1.a	The forest owner or manager is financially able to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management.	Timber revenue generated over the past three years has more than paid for all forest management/maintenance activities, including road building, installing new stream crossings, invasive species control, and forest management staff time.

Indicator 5.2.a	Where forest products are harvested or sold, opportunities for forest product sales and services are given to local harvesters, value-added processing and manufacturing facilities, and other operations that are able to offer services at competitive rates and levels of service.	Due to export restrictions required of all publicly-owned forests, all timber harvested from Clark County lands necessarily is sold to local mills. Through sort-based marketing, Clark County has been able to optimize the unique log sorts and values of its timber.
Indicator 5.3.b	Harvest practices are managed to protect residual trees and other forest resources, including:	Logging slash and non-merchantable log sections were redistributed throughout harvest unit to aid in soil development and to minimize compaction of soils by logging equipment.
Indicator 5.6.b	Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.	<i>Annual Allowable Cut (AAC): 576 MBF</i> Obs: The AAC for Camp Bonneville has been exceeded over the past three years due to stand improvement thinning, but will be reduced to the AAC on record during the second and following harvest entries. The FMP does not describe the rationale for the heavier first entry thinning, or the transition to lower harvest levels during subsequent thinning activities. Comment: the AAC within the FMP must be updated to provide rationale for higher harvest volumes during first entry stand improvement thinning activities. Additionally, projected harvest volumes for high priority (Commercial I and Commercial II) stands should be included in FMP.
Indicator 6.3.a.1	The forest owner or manager maintains, enhances, and/or restores under-represented successional stages in the FMU that would naturally occur on the types of sites found on the FMU.	Clark County's thinning regime is intended to create the overstory light conditions that will support natural regeneration of native conifers in the understory. Following thinning, the County is also manually underplanting conifers in order to accelerate the successional development of a second cohort.
Indicator 6.3.f	Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes.	Although snag retention was minimal during harvest activities due to operator safety concerns, some snags were left where they did not pose a hazard. Additionally, "rub" trees are expected to eventually die and recruit as snags, as well as natural mortality due to root rot and other vectors. Logging slash was distributed throughout the stand, as were non-merchantable sections of logs.
Indicator 6.3.h	The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control invasive species, including:	The County continues to proactively identify and eradicate non-native invasive species across both harvest units and non-harvested forestlands.
Indicator 6.5.d	The transportation system,	Clark County minimized construction of roads and landings

	including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights.	within FMU's by opting for longer skidding distances. All upgraded haul roads were designed for optimum drainage.
Indicator 7.1.1	The management plan describes the silvicultural and other management systems used and how they will sustain, over the long term, forest ecosystems present on the FMU.	Timber harvest activities were consistent with the silvicultural systems and objectives described in the FMP.
Indicator 8.2.a	Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) Yield of all forest products harvested. b) Growth rates, regeneration and condition of the forest. c) Composition and observed changes in the flora and fauna. d) Environmental and social impacts of harvesting and other operations. e) Costs, productivity, and efficiency of forest management.	Prior to conducting timber harvest activities, Clark County continues to install permanent forest inventory plots. Plots are intended to provide baseline data on current forest conditions, adjust growth rates, and serve as long-term monitoring plots.
Indicator 8.2.b	For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.	Clark County maintains and annually provides detailed timber harvest and log accountability reports to NNRG.

Best regards,

Kirk Hanson
Director, Northwest Certified Forestry