



Tuesday, October 17, 2017

Dear Mr. Decker,

Thank-you for taking the time to host my evaluation of your 2016/2017 timber harvest and forest management activities on September 19th. 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 three-hour evaluation, we visited recent and past harvest units in Forest Management Unit's (FMUs) 14, 15, 17 & 31 at Camp Bonneville, as well as proposed timber harvests in FMU 6. Additionally, we visited two of the four new properties Clark County is bringing under FSC certification – Spud Mountain and Lake Rosana. Due to no proposed management activities in the near term, I opted not to visit either Camp Hope or Bratton Canyon, and will plan to visit those prior to scheduled activities.

At each harvest site I continued to observe exemplary timber harvest practices that minimized soil disturbance and impacts to residual timber, enhanced forest structural complexity as per the *structure based management* objectives in the County's forest management plan, and optimized the value of the harvested timber through careful manufacturing and marketing. Beyond implementing ecologically-based timber harvests, I also observed actions the County is engaged in to restore forest habitat, including stream restoration, replanting riparian areas, replanting valley bottoms and removing invasive species. Each of these activities continue to be consistent with the long-term objectives of the County's forest management plan. 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 2.1.c	Boundaries of land ownership and use rights are clearly identified on the ground and on maps prior to commencing management activities in the vicinity of the boundaries	<p>No ownership signs, public notices, boundary markers or other signage was observed at either Spud Mountain or Lake Rosana.</p> <p>At a minimum, entrances to all County forestlands will be posted with an ownership sign that includes contact information. Due date: October 2018.</p>
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.	<p>Clark County continues to host tours of forestry operations that are open to small woodland owners and general stakeholders alike.</p> <p>The County is encouraged to provide interpretive signs, materials or web-based resources for the public that describes the forestry program as the County opens its various forestlands for recreational use.</p>
Indicator 5.5.a	In developing activities on the FMU, the forest owner or manager identifies and defines appropriate measures for maintaining and/or enhancing forest services and resources that serve public values, including municipal watersheds, fisheries, carbon storage and sequestration, recreation and tourism.	Clark County is in the planning process for making the majority of Camp Bonneville, and all of the remaining properties, accessible to the public for recreational purpose through the County's Public Works program.
Indicator 6.3.c	Management maintains, enhances and/or restores the plant and wildlife habitat of Riparian Management Zones (RMZs)	Clark County is actively replanting unforested riparian areas to a mix of native hardwoods and conifers.
Indicator 6.3.d	Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.	Clark County currently does not actively survey for natural regenerating understory trees. The County should consider including this feature in future monitoring to ensure that natural regeneration that is called for in the management plan is being met within each management unit.
Indicator 6.3.f	Management maintains, enhances, or restores habitat components and associated stand	Although snag and downed log targets are identified in the forest management plan, they do not appear to factor into timber

	structures, in abundance and distribution that could be expected from naturally occurring processes.	<p>harvest planning, and there is not a mechanism for confirming whether targets are being met. Large, non-merchantable logs are either being piled for burning, or made available for firewood, rather than being distributed back out into the harvest unit.</p> <p>Forest manager will modify timber harvest prescriptions and contracts to include retention of cull logs in the woods. Recruitment of snags and downed logs should be included in future monitoring plans. Due date: April 2018.</p>
Indicator 6.3.g.1.a:	<p>Within harvest openings larger than 6 acres, 10-30% of pre-harvest basal area is retained. The levels of green-tree retention depend on such factors as: opening size, legacy trees, adjacent riparian zones, slope stability, upslope management, presence of critical refugia, and extent and intensity of harvesting across the FMU. Retention is distributed as clumps and dispersed individuals, appropriate to site conditions. Retained trees comprise a diversity of species and size classes, which includes large and old trees.</p>	<p>FMU 31 comprises a 24-acre regeneration harvest of a 60 – 90 year old Douglas fir dominated stand. Retention volumes were not quantified prior to harvest, and may not meet the minimum 10% pre-harvest basal area threshold of the FSC standards as called for in the County’s forest management plan.</p> <p>This FMU is unique in that future timber management will not be possible due to a boundary line change that will include the unit in the Central Impact Area at the Camp. Therefore, a regeneration harvest was planned in order to optimize the value of the timber while it was still accessible. This action to optimize forest resources is consistent with FSC’s Indicator 5.1. In the harvest planning for this unit, larger buffers were retained along the nearby fish-bearing stream, and live tree retention levels exceed WA Forest Practices Rules. Further, the remainder of the forested areas at the Camp are comprised of older Douglas fir stands, and there is a paucity of early-seral habitat. The unit will be replanted with a mix of native conifers, and henceforth managed strictly for conservation values. This one-time deviation from the FSC standards is therefore deemed justified.</p>
Indicator 6.5.c	Management activities including	Logging slash is currently being piled for

	<p>site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. The following actions are addressed:</p> <ul style="list-style-type: none"> • Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard. 	<p>burning, rather than distributed back into the harvest unit.</p> <p>Forest manager will modify harvest prescriptions to require logging slash to be distributed throughout harvest units, or along skid trails, as feasible for the site and operation. Due Date: April 2018.</p>
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