

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

Fort Bidwell Indian Reservation

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

**CERTIFICATION REGISTRATION NUMBER
SCS-FM/COC-00064N**

Submitted to:

**Fort Bidwell Indian Community Council
PO Box 129, Ft. Bidwell, CA 96112**

Report Authored by:
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Date of Report:
February 23, 2004

Date of Field Audit:
October 2003

Updated: December 2005 (See Section 4.1)
Updated: December 2006 (See Section 4.2)
Updated: November, 2007 (See Section 4.3)

By:

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SECTION A. PUBLIC SUMMARY & BACKGROUND INFORMATION	3
1.0 GENERAL INFORMATION.....	3
1.1 FSC Data Request.....	3
1.2 General Background	3
1.3 Forest Management Enterprise	4
1.3.1 Background Information.....	4
1.3.2 Management Objectives.....	4
1.3.3 Silvicultural Systems	5
1.3.4 Estimates of Maximum Sustainable Yield.....	5
1.3.5 Estimated, Current and Projected Production.....	5
1.4 Environmental and Socioeconomic Context.....	5
1.4.1 Environmental Context	5
1.4.2 Socioeconomic Context	5
1.4.3 High Value Conservation Forest.....	6
1.5 ADMINISTRATIVE CONTEXT.....	6
1.6 Products Produced	7
1.7 Chain-of-Custody - Tracking, Tracing and Identification of Products.....	7
1.8 Other Activities.....	7
2.0 THE CERTIFICATION ASSESSMENT PROCESS.....	7
2.1 Assessment Dates.....	7
Certification Audit: A full assessment was conducted in October 2003	7
2.2 Assessment Team.....	7
2.3 Assessment Process	8
2.4 Stakeholder Consultation	8
2.4.2 Summary of Legal and Customary Use-rights.....	8
2.4.3 Names, Affiliations and Contact Details (If Available) of People Consulted ..	8
2.4.3 Summary of Stakeholder Concerns and Perspectives and Responses from the Team Where Applicable	9
2.5 Guidelines/Standards Employed.....	10
2.6 SCORING PROCESS.....	10
3.0 RESULTS, CONCLUSIONS AND RECOMMENDATIONS	11
Table 3.1 Notable strengths and weaknesses of the forest management enterprise relative to the P&C.....	11
3.2 Certification Recommendation and Justification.....	14
3.4 Proposed CARs attached to certification	14
4.0 AUDITS.....	15
5.0 PUBLIC INFORMATION ABOUT the FOREST MANAGEMENT PLAN AND MONITORING.....	27

SECTION A. PUBLIC SUMMARY & BACKGROUND INFORMATION

1.0 GENERAL INFORMATION

1.1 FSC DATA REQUEST

Name and contact information for the certified operation:

- Applicant entity: Fort Bidwell Indian Community Council
- Contact person: Frances Bennally, Council Chair
- Address: PO Box 129, Ft. Bidwell, CA 96112
- Telephone: 530-279-6310
- Fax: 530-279-2233
- E-mail: NA
- Certified products: Softwood logs and chips
- Number of Acres/hectares certified: 2,286 acres
- Nearest Town: Ft. Bidwell
- Biome: Basin and Range
- Tenure: Native American
- Forest Composition: Ponderosa pine/ white fir/ incense-cedar
- Managed as: Natural Forest

1.2 GENERAL BACKGROUND

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by the Fort Bidwell Indian Community Council to conduct a certification evaluation of its forest estate. Under the FSC/SCS certification system, forest management operations meeting international standards of forest stewardship can be certified as “well managed”, thereby enabling use of the FSC endorsement and logo in the marketplace.

In October 2003, SCS contracted with Barry Sims to conduct the evaluation. Mr. Sims collected and analyzed written materials, conducted interviews and completed a two-day field and office audit of the subject property as part of the certification evaluation. Upon completion of the fact-finding phase of the evaluation, the team assigned performance scores to the 43 FSC Criteria and, from those scores, generated weighted average performance scores for each of the 9 FSC Principles, in order to determine whether award of certification was warranted.

This report is issued in support of a recommendation to award FSC-endorsed certification to the Fort Bidwell Indian Community Council, for the management of its forest estate. In the event that a certificate is awarded, Scientific Certification Systems will post this public summary of the report on its web site (www.scscertified.com).

1.3 FOREST MANAGEMENT ENTERPRISE

1.3.1 Background Information

The Fort Bidwell Indian Reservation consists of 3,244 acres located in far northeastern California in Modoc County, on the eastern slopes of the Warner Mountains, of which 2,286 acres are in forestland.

Until the mid-1990s, the U.S. Bureau of Indian Affairs directly controlled forest management activities, with little involvement of the tribe. Since that time, the tribe has taken active control of management, and has hired Alan Jones of Atterbury Consultants to oversee forestry operations on behalf of the tribe.

1.3.2 Management Objectives

As contained in the applicant's programmatic materials, the objectives of the subject forest management operation are:

- 1) Clean up the aftermath from the heavy mortality and overall decline of the white fir component by salvaging or piling and burning downed and standing dead and dying white fir.
- 2) Protect and enhance water qualities, specifically in and around Soldier Creek.
- 3) Reduce fuel loading to acceptable levels.
- 4) Convert most of the timber types now dominated by white fir back to pine and interplant pine as necessary.
- 5) Reverse the encroachment of white fir into pine dominated timber types and interplant ponderosa pine as necessary.
- 6) Thin (pre-commercial) in the pine dominated timber types, as needed, to improve stocking levels and upgrade growing stock.
- 7) Determine an annual allowable cut following a time period in which the forest is cleaned up and converted back to a condition enabling sustainability.
- 8) Continue to maintain and upgrade the fuel breaks around the Reservation.
- 9) Provide employment for Tribal members.
- 10) Generate sustainable Tribal income after the forest has been cleaned up and converted back to a condition enabling long-term sustainability.
- 11) Procure eventual certification through the Forest Stewardship Council

1.3.3 Silvicultural Systems

The long-term approach to silviculture is to convert the current even-age stands to an uneven-age condition and to restore ponderosa pine to its historic dominance. Initially, the treatments consist of extensive removal of white fir, both live and dead, to reduce stocking and enable ponderosa pine to reproduce in the under story.

1.3.4 Estimates of Maximum Sustainable Yield

The U.S. Bureau of Indian Affairs (BIA) calculated an annual allowable cut of 310 thousand board feet (MBF). This estimate is not based on a salvage and restoration model for the forest, but rather a simple sustained yield calculation based on volumes and growth rates.

1.3.5 Estimated, Current and Projected Production

Actual production under the new forest management plan completed in 2001 is 1,942 MBF during 2002 and 2003, for an average annual harvest of 971 MBF. The vast majority (94%) of the saw log volume harvested was white fir, which is consistent with the restoration objectives.

1.4 ENVIRONMENTAL AND SOCIOECONOMIC CONTEXT

The forest is very remote and the area is sparsely populated. The forest provides recreation, plant gathering opportunities, clean water, and income from the sale of forest products to a small tribe of Paiute Indians.

1.4.1 Environmental Context

The Fort Bidwell Indian Reservation consists of 3,244 acres located in far northeastern California in Modoc County, on the eastern slopes of the Warner Mountains. The land was used as a U.S. military post, and later as an Indian school before being designated as an Indian reservation in 1936 for the Gidutikad Band of Paiutes.

Approximately 2,286 acres of the reservation are in forestland, the remainder being grassland and developed areas. The U.S. military logged the old-growth timber, and the remaining forest is second-growth Ponderosa pine with major encroachment of white fir due to fire suppression activities. Beginning in the 1980s, extensive mortality has occurred in the white fir, leading to forest fuel loads that pose an extreme risk of catastrophic fire.

1.4.2 Socioeconomic Context

The town of Fort Bidwell is inhabited by approximately 100 tribal members and is quite remote. The community relies on the forest for watershed values since the community drinking water source, Soldier Creek, is contained in the forested slopes of the reservation.

1.4.3 High Value Conservation Forest

As required by FSC Principle 9, the evaluation team emphasized the importance of maintaining selected sites as High Value Conservation Forest within the defined forest area, and audited accordingly. HCVF may include unique or threatened ecological areas and/or areas of cultural significance that must be managed so as to maintain the attributes that make them of high conservation value. That is, HCVF cannot be converted to other types of forest cover lacking in the attributes that make these areas HCVF.

In the case of the Ft. Bidwell Reservation, the portion of the ownership that drains into Soldier Creek, the source for the community's drinking water, shall be considered HCVF. This amounts to approximately 350 acres, although a definitive size for this area has not been determined. Because the primary management objective in this area is to maintain water quality and quantity, the Tribe's forest management program is affirmatively maintaining the identified high conservation value attributes of the forest. In the judgment of the Evaluation Team, the management of the Fort Bidwell Reservation forest does not conflict with the FSC policy that HCVF forests be maintained.

1.5 ADMINISTRATIVE CONTEXT

As a Native American tribe with treaty rights with the U.S. Government, The Fort Bidwell Reservation is not subject to California state forestry regulations. Because the BIA maintains supervisory authority over the tribal forest management activities, all U.S. federal regulations must be met.

Pertinent Regulations at the Federal Level:

- a) Endangered Species Act
- b) Clean Water Act (Section 404 wetland protection)
- c) Occupational Safety and Health Act
- d) National Historic Preservation Act
- e) Archaeological and Historic Preservation Act
- f) Americans with Disabilities Act
- g) U.S. ratified treaties, including CITES

Pertinent Regulations at State and Local Level:

Since State laws are not applicable, the Fort Bidwell Indian Council has adopted and implemented Tribal timber management ordinances and standards, which address best management practices for logging, yarding, road construction and maintenance, and other forest management issues.

1.6 PRODUCTS PRODUCED

The forest produces sawlogs and chips from the following species: ponderosa pine, white fir, and incense-cedar.

1.7 CHAIN-OF-CUSTODY - TRACKING, TRACING AND IDENTIFICATION OF PRODUCTS

At the request of the certification applicant, SCS conducted a joint forest management and chain-of-custody certification evaluation of the defined forest area. With respect to the lands managed by Fort Bidwell Indian Community Council, the chain-of-custody focus is on the “stump to forest or mill gate.” That is, chain-of-custody begins with the severing of a standing tree to produce a merchantable log and ends with that log(s) leaving the custody of the Reservation, at the “forest or mill gate.” During the fieldwork for the forest management evaluation, the evaluation team investigated the manner by which the Tribe maintains chain-of-custody of timber as it moves from the stump to the mill gate. As is detailed later in this joint FM/COC certification evaluation report, it is the conclusion of the SCS evaluation team that Ft. Bidwell’s chain-of-custody procedures meet the FSC Principles of Chain-of-Custody. More accurately, it was found that the procedures already in place for assuring the integrity of the certified log supply are being followed in a manner that constitutes solid overall conformance to the FSC Principles of Chain-of-Custody. Accordingly, award of CoC certification to the Fort Bidwell Indian Community Council for the “stump to gate” is warranted.

1.8 OTHER ACTIVITIES

There are few other activities in the forest. The Fort Bidwell Indian Community Council has explored the possibility of geothermal energy generation on the reservation. Most of the geothermal potential lies in lower elevation, nonforested portions of the reservation.

2.0 THE CERTIFICATION ASSESSMENT PROCESS

2.1 ASSESSMENT DATES

Pre-Certification Audit: A preliminary assessment was conducted in October 2001

Certification Audit: A full assessment was conducted in October 2003

2.2 ASSESSMENT TEAM

Barry Sims served as Team Leader and sole member for the evaluation team. Mr. Sims is a consulting forester based in Portland, and he serves as Pacific Northwest Regional Representative for SCS. Mr. Sims has provided chain-of-custody and forest management certification evaluation services to clients in seven states and British Columbia. His forest management certification experience includes conducting evaluations for tribal forestry operations, industrial ownerships, and consulting forestry firms. He earned his M.S. in Forestry from the University of Vermont.

2.3 ASSESSMENT PROCESS

Scoping for the assessment took place in 2001 through an onsite evaluation, which resulted in a report and preliminary findings. The chief obstacle to certification at that time was the fact that the management plan had not yet been implemented, so there was relatively little evidence upon which to base an evaluation. SCS and the Fort Bidwell Indian Community Council maintained communications through 2002 and in 2003 initiated the formal full FSC evaluation process.

The field portion of the evaluation took place on October 6 and 7, 2003, and included a variety of sites designed to illustrate a cross-section of stand types and treatments, focusing on harvests conducted within the last two years.

2.3.1 Justification for selection of items and places inspected

Because of the size of the subject forest and the fact that within the past ten years, harvesting has occurred only in 2002 and 2003, it was relatively easy to inspect all areas with recent harvest activity, as well as to view key sites, such as the water intake station for the community, areas of recent road maintenance work, and untreated areas exhibiting high mortality in both white fir and ponderosa pine.

2.4 STAKEHOLDER CONSULTATION

2.4.1 Identification of Stakeholders Influenced by the Enterprise

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

- 1) To solicit input from affected parties as to the strengths and weaknesses of Fort Bidwell's management and the nature of the interaction between the company and the surrounding communities.
- 2) To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests.

2.4.2 Summary of Legal and Customary Use-rights

The Tribe has both legal and customary use rights to the forest resources on the reservation.

2.4.3 Names, Affiliations and Contact Details (If Available) of People Consulted

Prior to, during, and following the site evaluation, a range of stakeholders from the regional area were consulted in regard to their relationship with the Fort Bidwell Reservation, and their views on the management of the forest lands. Stakeholders included FSC contact persons, government and non-government organizations involved in forest management, local citizens and groups, employees, contractors, and others. Stakeholders were contacted with a notification mailing soliciting comment and/or phone contact. Comments were received via meetings and personal interviews “face-to-face”, phone interviews (“Interview”), and through written responses. Individuals or groups not offering feedback are labeled “no response” (“NR”).

Name	Affiliation	Consultation
Dan Meza	Tribal Relations, US Forest Service, Modoc National Forest	Interview
Frances Bennally	Tribal Chair and Manager, Fort Bidwell Indian Forest Enterprise	Interview
Alan Jones	Forester, Atterbury Consultants (contractor)	Interview
Sherry Smith	Entomologist, US Forest Service, Susanville	NR
Ben Wynne	Vice Chair, Fort Bidwell Indian Community Council	Interview
John Baskette	Regional Timber Sales Officer, BIA Pacific Regional Office	Interview

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

There were no major concerns expressed from stakeholders regarding the management of the Fort Bidwell Reservation forestlands. John Baskette, who has a supervisory role in approving tribal timber sales and in ensuring that the NEPA requirements are met, stated that he was quite pleased with the management of the forestlands and in the direction the Tribe is headed with regard to forestry. He was not aware of any instances of non-compliance with any federal laws or tribal ordinances by the Tribal forest enterprise. Dan Meza expressed some concern that noxious weed sites had been mapped but that there had been no follow-up to develop an approach to containing or eliminating these invasive species. Both Meza and Baskette felt very comfortable with the management strategy and expressed that the involvement of Alan Jones of Atterbury Consultants was a real asset for the tribal forest management program.

2.5 GUIDELINES/STANDARDS EMPLOYED

The standard employed for the evaluation was the Pacific Coast Regional Standard (V7.9), which has been duly approved by the FSC US and FSC International.

2.6 SCORING PROCESS

Consistent with SCS Forest Conservation Program evaluation protocols, for scoring purposes the team collectively assigned weights of relative importance to the Criteria within each of the nine Principles. Scores were assigned to each Criterion at the completion of the field phase and importance-weighted means (average scores) were calculated for each Principle. Scoring takes place on a 100-point scale, using a consensus process amongst all members of the evaluation team. Scores less than 80 points connote performance in which there is discernible non-conformance to the breadth of a Criterion. For any Criterion for which the team assigns a score below 80 points, the team is required to specify one or more Corrective Action Requests (CARs), also known as “conditions.” If the weighted average score of any Principle is less than 80, certification cannot be awarded and, instead, the evaluation team must stipulate one or more Major Corrective Action Requests (Major CARs), also known as “pre-conditions.” The evaluation team also retains the option to specify “discretionary CARs” even when the score for the pertinent Criterion is above 80 points. This may occur when, overall, the Criterion was highly scored but there are issues within the scope of a Criterion where important improvements are, in the judgment of the team, necessary even though these deficiencies are not severe enough to move the score below 80 for the Criterion. For certification to be awarded, the importance-weighted average score for each of the nine FSC Principles must be 80 points or higher.

Interpretations of Preconditions (Major CARs), CARs and Recommendations

Preconditions/Major CARs: These are corrective actions that must be resolved or closed out prior to award of the certificate. These arise when the importance-weighted average score for a Principle is less than 80 points or where there is observed non-compliance with a “pre-emptive” indicator (e.g., use of GMOs is a “fatal flaw” that precludes award of certification regardless of the strength of the overall management program).

CARs: Corrective actions must be closed out within a specified time period of award of the certificate. Certification is contingent on the certified operations response to the CAR within the stipulated time frame.

Recommendations: These are suggestions that the audit team concludes would help the company move even further towards exemplary status. Action on the recommendations is voluntary and does not affect the maintenance of the certificate. Recommendations can be changed to CARs if performance with respect to the criterion triggering the recommendation falls into non-compliance.

3.0 RESULTS, CONCLUSIONS AND RECOMMENDATIONS

Table 3.1, below, contains the evaluation team’s findings as to the strengths and weaknesses of the subject forest management operation relative to the FSC Principles of Forest Stewardship. The table also presents the calculated performance scores for each Principle as well as the Corrective Action Request (CAR) numbers related to each Principle.

TABLE 3.1 NOTABLE STRENGTHS AND WEAKNESSES OF THE FOREST MANAGEMENT ENTERPRISE RELATIVE TO THE P&C

Principle/Subject Area	Strengths	Weaknesses	Performance Score and CAR/REC #s
P1: FSC Commitment and Legal Compliance	<ul style="list-style-type: none"> ▪ Extensive BIA rules and regulations have been followed ▪ The tribal forest managers seem fully committed to FSC certification 	<ul style="list-style-type: none"> ▪ Cows are still grazing in portions of the forest, despite the tribe’s goal of keeping them out. 	<p style="text-align: center;"><u>89</u></p> <ul style="list-style-type: none"> • No CARs
P2: Tenure & Use Rights & Responsibilities	<ul style="list-style-type: none"> ▪ Excellent maps exist and property boundaries are well marked in the field • The tribe is in control of most forest management activities ▪ Community members have been consulted extensively on forest management issues 	<ul style="list-style-type: none"> ▪ BIA still retains control over certain aspects of forest management 	<p style="text-align: center;"><u>92</u></p> <ul style="list-style-type: none"> • No CARs
P3: Indigenous Peoples’ Rights	<ul style="list-style-type: none"> ▪ The tribal government is directly involved in decision-making for the forest ▪ Forest managers seek and receive input from a wide spectrum of community members 	<ul style="list-style-type: none"> ▪ The area was historically the site of a US military fort and not of any particular significance to the Tribe, which utilized other areas in the Warner Mountains 	<p style="text-align: center;"><u>90</u></p> <ul style="list-style-type: none"> • No CARs

Principle/Subject Area	Strengths	Weaknesses	Performance Score and CAR/REC #s
P4: Community Relations & Workers' Rights	<ul style="list-style-type: none"> ▪ Efforts have been made to hire local contractors and workers. • Community consultation is ongoing • Concerns are well addressed by managers 	<ul style="list-style-type: none"> ▪ The planned Tribal Forest Enterprise has not materialized 	<p style="text-align: center;"><u>87</u></p> <ul style="list-style-type: none"> • REC 2003.1
P5: Benefits from the Forest	<ul style="list-style-type: none"> ▪ There appears to be no undue financial pressure on the forestry operation that would cause a deviation from the management plan. ▪ Inappropriate dominance of white fir is being addressed. ▪ Council resolution in place that acknowledges the need for increased harvest levels but only in the short term. 	<ul style="list-style-type: none"> • Currently there is no mechanism to ensure that net revenues from timber sales are re-invested in forest improvement work. • Unacceptably high levels of damage to residual trees were observed. • Adequate biomass is not being retained onsite for ecosystem function, wildlife habitat, and future forest productivity. 	<p style="text-align: center;"><u>83</u></p> <ul style="list-style-type: none"> • CAR 2003.1
P6: Environmental Impact	<ul style="list-style-type: none"> • Restore forest to pine dominance • Retain minor species such as white pine • Native seed sources to be used for replanting • Aggressive fuels reduction program is greatly reducing the risk of catastrophic fire ▪ Old growth trees not harvested ▪ Streams well protected by large buffer areas • No chemicals, GMOs, or exotics are used 	<ul style="list-style-type: none"> • Not enough slash and organic material left on soils after harvest • Unnecessary amount of soil disturbance in treated areas • Too few large woody debris pieces left on site • Residual stand damage not controlled • No control measures are in place to reduce the occurrence of invasive non-native species. 	<p style="text-align: center;"><u>91</u></p> <ul style="list-style-type: none"> • CAR 2003.2 • CAR 2003.3

Principle/Subject Area	Strengths	Weaknesses	Performance Score and CAR/REC #s
P7: Management Plan	<ul style="list-style-type: none"> ▪ Excellent plan is in place and being implemented. • Managers display openness to adapting plan as circumstances and monitoring results dictate ▪ GIS increasingly being used as an effective tool 	<ul style="list-style-type: none"> ▪ No summary currently available • Wildlife issues not well addressed in plan. • Special management areas, such as Soldier Creek Watershed, not described in plan. 	<p style="text-align: center;"><u>91</u></p> <ul style="list-style-type: none"> • CAR 2003.4
P8: Monitoring & Assessment	<ul style="list-style-type: none"> • Water quality continuously monitored ▪ Detailed inventory done within last few years 	<ul style="list-style-type: none"> • Soil disturbance/compaction not monitored • Non-native invasive species not being monitored • No summary of indicators currently available 	<p style="text-align: center;"><u>88</u></p> <ul style="list-style-type: none"> • CAR 2003.5
P9: Maintenance of High Conservation Value Forest	<ul style="list-style-type: none"> • HCVF identified during audit as Soldier Creek watershed ▪ Extensive consultation with tribal members led to the designation of water quality as a high priority for management 	<ul style="list-style-type: none"> ▪ Need to make explicit what the principles and guidelines for management of the watershed will be (addendum to plan) 	<p style="text-align: center;"><u>85</u></p> <ul style="list-style-type: none"> • CAR 2003.6

3.2 CERTIFICATION RECOMMENDATION AND JUSTIFICATION

As determined by the full and proper execution of the SCS *Forest Conservation Program* evaluation protocols, the evaluation team recommends that the Fort Bidwell Indian Reservation be awarded FSC certification with specified Corrective Action Requests.

Peer Reviewers

The following peer reviewers will review the draft of this evaluation report:

Jim Spitz, Consulting Forester

The evaluation team carefully considered the comments provided by the peer reviewer and made changes, as deemed appropriate, in response to those comments. The peer review comments are the personal professional opinions of the experts that submit comments and do not constitute the opinions or positions of the organizations within whom they are employed.

3.4 PROPOSED CARS ATTACHED TO CERTIFICATION

CAR 2003.1. Future timber sale/logging contracts must specify an acceptable level of residual stand damage, with penalties for poor performance, to create an incentive for more careful falling and skidding to protect residual trees.

CAR 2003.2. Guidelines must be developed to ensure adequate retention of large woody debris and biomass on site after harvest, while allowing for reasonable flexibility in the distribution of woody debris over the property. Such guidelines should be included in any future logging contracts, and must be provided to SCS prior to the time of the first annual audit.

CAR 2003.3. A noxious weed control strategy and plan must be developed, with input from relevant agency personnel and experts, and implemented to ensure that logging operations and associated soil disturbance do not result in introduction, uncontrollable spread, and irreversible ecological changes due to invasive exotic plants. This plan should be created as an addendum to the current forest management plan and must be provided to SCS prior to the time of the first annual audit.

CAR 2003.4. The operation must prepare a summary of the forest management plan and make it available to the public. This must be completed prior to the time of the first annual audit.

CAR 2003.5. The operation must prepare and maintain a summary of the results of monitoring of key indicators (please see Criteria 8.2 and 8.5 of the FSC Pacific Coast Regional Standard). This must be completed and made publicly available prior to the time of the first annual audit.

CAR 2003.6. The operation must formally designate the Soldier Creek Watershed area as a high conservation value forest, and develop written guidelines for management activities within the designated area to ensure that the specific conservation attributes (i.e., water quality and quantity) are safeguarded from any potential negative impacts of forest management. This must be done in an addendum to the forest management plan and should be made available to SCS prior to the time of the first annual audit.

Recommendation 2003.1. The Tribe should endeavor to build the tribal forestry enterprise by directing timber sale income into the enterprise to help staff, train, supervise, and deploy work crews that can provide employment for local tribal members as well as provide needed services in the woods, such as slash disposal, pre-commercial thinning, noxious weed control, etc.

4.0 AUDITS

4.1 2005 Annual Audit

4.1.1 Assessment Dates

The annual audit took place on December 27, 2005.

4.1.2 Assessment Personnel

Brendan Grady performed this Annual Audit.

Brendan Grady, Certification Forester:

Brendan Grady is a staff forester with Scientific Certification Systems, focusing on the Forest Conservation Program. He received his B.S. in Forestry from the University of California, Berkeley, in 2004. His previous experience includes forestry work with the California Department of Forestry and Fire Protection and research on tropical plantations in Moorea, French Polynesia, with the Service du Developement Rurale.

4.1.3 Assessment Process

For the 2005 Annual Audit of Ft. Bidwell, a desk audit was conducted, as allowed under the FSC guidelines for Small or Low Intensity Managed Forests (SLIMF's). Originally a field audit was scheduled to take place, but poor weather conditions made site visits impossible.

The annual audit consisted of a phone interview on December 27, 2005, with Alan Jones, the forest manager. The previous year's operations were discussed, as well as the progress made towards closing the open CAR's resulting from the original evaluation.

4.1.4 Status of Corrective Action Requests

CAR 2003.1	Reference: Criterion 6.5
Future timber sale/logging contracts must specify an acceptable level of residual stand damage, with penalties for poor performance, to create an incentive for more careful falling and skidding to protect residual trees.	
Action Taken By Company/Auditor Comments	
Fort Bidwell has added a section to their standard logging contract entitled “Excess damage to residual trees penalty”, which describes acceptable levels of residual stand damage, officer-in-charge damage inspection procedures, and financial penalties for poor performance. The forest manager reports that these changes, along with using more experienced logging contractors, has reduced the level of residual stand damage.	
Position in the end of this audit: Closed, but needs to be reviewed in the field during the next annual audit	

CAR 2003.2	Reference: Criterion 6.5
Guidelines must be developed to ensure adequate retention of large woody debris and biomass on site after harvest, while allowing for reasonable flexibility in the distribution of woody debris over the property. Such guidelines should be included in any future logging contracts, and must be provided to SCS prior to the time of the first annual audit.	
Action Taken By Company/Auditor Comments	
Logging contracts now specify that logs which cannot be sold as sawlogs but are too large to normally be chipped for hog fuel are redistributed evenly throughout the harvest unit for wildlife purposes. Placement of such logs occurs at the discretion of the logger with oversight from the officer-in-charge.	
Position in the end of this audit: Closed, but needs to be reviewed in the field during the next annual audit	

CAR 2003.3	Reference: Criterion 6.9
A noxious weed control strategy and plan should be developed, with input from relevant agency personnel and experts, and implemented to ensure that logging operations and associated soil disturbance do not result in introduction, uncontrollable spread, and irreversible ecological changes due to invasive exotic plants. This plan should be created as an addendum to the current forest management plan and must be provided to SCS prior to the time of the first annual audit.	
Action Taken By Company/Auditor Comments	
Noxious weeds were inventoried and mapped by the Bureau of Land Management through a tribal outreach program. The Fort Bidwell forestry office was somewhat unsatisfied with the work because they felt it they did not have adequate input in the process. A new working group is being created that may focus some noxious weed work towards forestry uses. The management plan has not yet been amended, as the forest managers are waiting to include the addendum as part of a revision of the plan later this year.	
Position in the end of this audit: Open	

CAR 2003.4	Reference: Criterion 7.4
The operation must prepare a summary of the forest management plan and make it available to the public. This must be completed prior to the time of the first annual audit.	
Action Taken By Company/Auditor Comments	
An article discussing forest management on the Fort Bidwell reservation was included in the	

reservation newsletter. This information, and more specifics regarding the management plan, is available to interested stakeholders from the Fort Bidwell forestry office.
Position in the end of this audit: Closed

CAR 2003.5	Reference: Criterion 8.4
The operation must prepare and maintain a summary of the results of monitoring of key indicators (please see Criteria 8.2 and 8.5 of the FSC Pacific Coast Regional Standard). This must be completed and made publicly available prior to the time of the first annual audit.	
Action Taken By Company/Auditor Comments	
Results of all monitoring activities, including yields of forest products, timber inventories, threatened and endangered species surveys, and environmental impact reviews, are publicly available from the Bureau of Indian Affairs	
Position in the end of this audit: Closed	

CAR 2003.5	Reference: Criterion 9.1
The operation must formally designate the Soldier Creek Watershed area as a high conservation value forest, and develop written guidelines for management activities within the designated area to ensure that the specific conservation attributes (i.e., water quality and quantity) are safeguarded from any potential negative impacts of forest management. This must be done in an addendum to the forest management plan and should be made available to SCS prior to the time of the first annual audit.	
Action Taken By Company/Auditor Comments	
Forest maps have set aside the Soldier Creek Watershed area as a special conservation area. Currently no harvesting is taking place in the watershed, and there are no future harvesting plans. The extreme slopes in the watershed currently preclude harvesting. They may enter the area in 2008 if cable yarding projected to be done in 2007 can be accomplished without impacting water quality or quantity. Official changes to the forest management plan have not been made, as the plan is currently being re-written to accommodate additional acreage added to the reservation. The next draft of the management plan is expected to be completed in late summer 2006.	
Position in the end of this audit: Open	

REC 2003.1	Reference: Criterion 5.1
The Tribe should endeavor to build the tribal forestry enterprise by directing timber sale income into the enterprise to help staff, train, supervise, and deploy work crews that can provide employment for local tribal members as well as provide needed services in the woods, such as slash disposal, pre-commercial thinning, noxious weed control, etc.	
Action Taken By Company/Auditor Comments	
The revenue generated from timber sales has been restructured to first fund costs related to forest management. Any net revenue resulting from a sale is split between the forestry enterprise (a corporation wholly owned by the tribe) and the tribe's general fund. This restructuring is a positive step that will allow for funds dedicated exclusively to forest management on the reservation.	
Position in the end of this audit: Closed	

4.1.5 General Observations, New Corrective Action Requests and Recommendations

For the 2005 Annual Audit, bad weather late in the season prevented the auditors from conducting a field review. For this reason, a desk audit was conducted earlier than is typical for SLIMF operations. CAR's closed during this annual audit should be revisited with field inspections during next year's field audit.

Additional land was added to the Fort Bidwell reservation in 2005, resulting in an increase in the certified area. The new total area of the FMU is 2,415 acres.

No new corrective actions or recommendations were issued during this audit.

4.1.6 General Conclusions of the 2006 Annual Audit

Based upon information gathered through site visits, interviews, and document reviews, the SCS auditor concludes that the forest management of Fort Bidwell continues to be in strong overall compliance with the FSC Principles and Criteria, as elaborated by the Pacific Coast Regional Guidelines. That is, and while there remains aspects of the management program that are deficient relative to the standard of certification, the SCS audit team has concluded from this annual audit that Fort Bidwell's forest management program is in general conformance with FSC Principles 1 through 9. As such, continuation of the certification is warranted, subject to ongoing progress in closing out the two open CARs and subject to subsequent annual audits.

4.2 2006 Annual Audit

4.2.1 Assessment Dates

The annual audit took place on November 17, 2006.

4.2.2 Assessment Personnel

Sterling Griffin, Certification Forester: Sterling Griffin is a Certification Forester with Scientific Certification Systems. He is a Registered Professional Forester in the State of California with 8 years professional experience in public and private forest management. After graduating from Purdue University with a B.S in Forestry, his professional career began with the U.S. Forest Service where he spent 5 years working in inventory, fire use, silviculture, and ecosystem research. Areas of research activities included stand level response to vegetative competition and long-term ecosystem productivity (LTEP) in the Pacific Northwest. Prior to joining SCS, he was the founder of a private consulting firm in Northern California specializing in sustained yield management, fuel reduction, and forest health management

4.2.3 Assessment Process

The scope of the 2006 annual audit included document review, spending time in the field and office, interviewing management personnel and, as appropriate, interacting with outside stakeholders. The field portion of the audit consisted of the following stops and discussions of relevant issues:

Soldier Creek Watershed (350 acres):

- Slopes approach 70-80% in some areas while the average is around 45%. There are existing roads on the ridges above the watershed that could be used for cable operations.
- A spring located near the creek at the bottom of the watershed is the source of drinking water for the Reservation. The intake is capped and abutments have been constructed around the spring for slope stabilization.
- Viewed large amount of dead and dying white fir and heavy accumulation of down and dead coarse woody debris. There appeared to be extreme fuel loading and a high risk for catastrophic wildfire.
- Discussed proposed Soldier Creek Watershed management guidelines. Integrated Resource Management Plan (IRMP) Committee had rejected the “do nothing” approach based on fire hazard.

Firewood Cutting in Juniper Woodland Conversion Unit:

- Tribal members were employed by the Tribal Council to buck downed juniper for firewood to deliver to tribal members
- All members of the crew were wearing personal safety protection equipment including hardhats, eye and ear protection, chaps, boots, and gloves. They had participated in a tailgate safety meeting the previous day.
- The unit had been recently harvested, removing merchantable white fir. All pines were left uncut and provided a decent amount of residual stocking. The goal was to convert this unit from a juniper woodland type to its original pre-settlement condition. All juniper were felled and left on site for firewood cutting.
- Discussed forest type maps based on a property-wide inventory done in 2000. The adjacent unit was classified as juniper woodland based on soils, and will not be converted to commercial timberland type (pine).

Section Line Timber Sale

- Logged in 2006. Cut only white fir; all pine and cedar left uncut.
- Many white fir left to provide good site occupancy where pines were not present. Trees in residual stand appeared healthy with dense, full crowns. Residual stocking estimated to be 75 ft² of basal area per acre.
- Discussed invasive species concerns and status of efforts to draft control strategy
- Damage to residual trees was acceptable; however, appears to remain a concern that foresters will have to monitor.
- Prescription for retaining CWD in logging contract appeared easy to implement and to be providing good retention of logs and organic material.

Aspen Preserve (40 acres)

- Area set aside as “no cut” to protect riparian habitat.
- Unique stand type on the reservation
- Discussed two other preserves set aside for hunting and recreation after receiving input from tribal members. The “Hole” consists of 80 acres used for hunting and the “Ponds” area has an emphasis on recreation.

“Middle Unit” Timber Sale

- View marked stand not yet harvested.
- Heavy fuel load and many dead and dying white fir.
- Discussed Bureau of Indian Affairs’ classification of silviculture as “shelterwood”, however the goal is to underplant pine through out most of the unit and remove white fir regeneration through TSI activities.
- Adequate amount of snags retained or created in adjacent units.

4.2.4 Status of Corrective Action Requests

CAR 2003.3	Reference: Criterion 6.9
A noxious weed control strategy and plan should be developed, with input from relevant agency personnel and experts, and implemented to ensure that logging operations and associated soil disturbance do not result in introduction, uncontrollable spread, and irreversible ecological changes due to invasive exotic plants. This plan should be created as an addendum to the current forest management plan and must be provided to SCS prior to the time of the first annual audit.	
Action Taken By Company/Auditor Comments	
Noxious weeds were inventoried and mapped by the Bureau of Land Management through a tribal outreach program. The Fort Bidwell forestry office was somewhat unsatisfied with the work because they felt it they did not have adequate input in the process. A new working group is being created that may focus some noxious weed work towards forestry uses. The management plan has not yet been amended, as the forest managers are waiting to include the addendum as part of a revision of the plan later this year.	
Auditor Comments (November, 2006)	
The addendum has yet to be adopted by the Tribal Council. The forest managers presented the following justification for the delay: In February, 2006, the Tribal Council created an interdisciplinary Integrated Resource Management Plan (IRMP) Committee to draft an IRMP for the entire reservation. Invasive species will be addressed in the context of each resource managed on the reservation in the IRMP. Therefore, under the forest management section, an invasive species control strategy will be developed. Ft. Bidwell is in partnership with the local BLM office to address invasives found in the valley. The BLM field staff representative will be responsible for drafting the invasive species control strategy for each resource in the IRMP. The IRMP Committee feels it is prudent to allow the BLM representative to finish her work before finalizing and adopting an addendum to the Forest Management Plan. The auditor was assured that this process was ongoing and would be completed within the next few months. Additionally, invasive species monitoring is in the forefront of the managers’ concerns and a considerable amount of thought is being applied to this problem. An extension of this CAR granted so that the IRMP Committee can send an addendum to the Tribal Council for approval. <i>The Council must approve a completed invasive species control strategy as an addendum to the Forest Management Plan by the 2007 annual audit.</i>	
Position in the end of this audit: Open	

CAR 2003.5	Reference: Criterion 9.1
<p>The operation must formally designate the Soldier Creek Watershed area as a high conservation value forest, and develop written guidelines for management activities within the designated area to ensure that the specific conservation attributes (i.e., water quality and quantity) are safeguarded from any potential negative impacts of forest management. This must be done in an addendum to the forest management plan and should be made available to SCS prior to the time of the first annual audit.</p>	
<p>Action Taken By Company/Auditor Comments</p> <p>Forest maps have set aside the Soldier Creek Watershed area as a special conservation area. Currently no harvesting is taking place in the watershed, and there are no future harvesting plans. The extreme slopes in the watershed currently preclude harvesting. They may enter the area in 2008 if cable yarding projected to be done in 2007 can be accomplished without impacting water quality or quantity. Official changes to the forest management plan have not been made, as the plan is currently being re-written to accommodate additional acreage added to the reservation. The next draft of the management plan is expected to be completed in late summer 2006.</p>	
<p>Auditor Comments (November, 2006)</p> <p>The forest manager presented draft management guidelines for the Soldier Creek Watershed. These guidelines have yet to be adopted by the Ft. Bidwell Tribal Council and placed as an addendum to the Forest Management Plan.</p> <p>In February, 2006, the Tribal Council created an interdisciplinary Integrated Resource Management Plan (IRMP) Committee to draft an IRMP for the entire reservation. This committee has been given the responsibility to coordinate all planning activities on the reservation including revisions or addendums to the Forest Management Plan. Accordingly, management guidelines for the Soldier Creek Watershed must now pass through the IRMP Committee before being adopted by the Tribal Council. The auditor feels this is an approach that will ensure the final guidelines are more comprehensive and acceptable to the entire tribal community.</p> <p>Whereas the IRMP Committee is relatively new and many procedural details must be developed, it is understandable that this CAR could not be closed during the November, 2006 annual audit. Therefore, a 6 month extension of this CAR will be given. <i>The IRMP Committee must approve management guidelines for the Soldier Creek Watershed by February, 2007. Following that approval the final guidelines must be adopted by the Tribal Council as an addendum to the Forest Management Plan by April, 2007.</i></p>	
<p>Position in the end of this audit: Open</p>	

4.2.5 General Observations, New Corrective Action Requests and Recommendations

The Integrated Resource Management Planning Committee has been very productive during its short period of existence. A draft of the IRMP is nearly complete and appears to be a well developed and concise planning effort that will greatly enhance the management of the reservation. They have also completed a wildlife habitat assessment and conducted numerous outreach functions to solicit input from tribal members. The IRMP process seems to be greatly embraced by the tribal council.

During the field visits of this annual audit, the auditor was able to confirm the incorporation of previous responses to Corrective Action Requests, and believes their closure during the 2005 desk audit was appropriate.

The 2007 field season will include planting of 50,000 seedlings, chipping hog fuel, and fuel reduction/stand restoration harvesting on +/- 250 acres. Included in that acreage will be the beginning of cable operations to treat the areas on steeper slopes.

New Corrective Action Requests

Background/Justification: In 1996, the Ft. Bidwell community initiated the 638 process with the BIA and assumed control of forest management on the reservation. Accordingly, new management objectives were developed. These objectives essentially amounted to a new silvicultural regime for the forest property. No corresponding estimate of annual allowable cut was developed for this new approach. Therefore, it is impossible to determine if the projected rate of harvest can be permanently sustained.	
CAR 2006.1	The forest managers must calculate a new annual allowable cut based on the new forest management objectives and produce harvest projections based on the current Forest Management Plan objectives. Included in this calculation must be the year in which growth will meet or exceed harvest for the rolling ten-year average. <i>The annual allowable cut must be attached to the Forest Management Plan as an addendum before the spring of 2007.</i>
Deadline	<i>May 2007</i>
Reference	FSC Criterion 5.6

Recommendations:

Background/Justification: Current monitoring efforts for most non-timber forest resources amount to visual inspection of stand conditions. Based on the relatively small size of the forest operation, this approach seems reasonable. However, in order for these observations to be used in future planning efforts, they should be documented.	
REC 2006.1	The forest managers should create a system for documenting periodic observations of stand conditions.
Reference	FSC Principle 8

4.2.6 General Conclusions of the 2006 Annual Audit

Based upon information gathered through site visits, interviews, and document reviews, the SCS auditor concludes that the forest management of Fort Bidwell continues to be in strong overall conformance to the FSC Principles and Criteria, as elaborated by the Pacific Coast Regional Guidelines. That is, while there remain aspects of the management program that are deficient relative to the standard of certification, the SCS audit team has concluded from this annual audit that Fort Bidwell's forest management program is in general conformance with FSC Principles 1 through 9. As such,

continuation of the certification is warranted, subject to ongoing progress in closing out the three open CARs and subsequent annual audits.

4.3 2007 Annual Audit

4.3.1 Assessment Dates

The annual audit took place on October 22, 2007.

4.3.2 Assessment Personnel

Sterling Griffin, RPF #2805: Sterling Griffin is a Senior Certification Forester with Scientific Certification Systems. He is a Registered Professional Forester in the State of California with 10 years professional experience in private and public forestland management. He is a graduate of Purdue University with a B.S in Forestry and has conducted Forest Stewardship Council endorsed assessments on over 5 million acres of forestland throughout the United States. Recent FSC assessments have included lands administered by the Fort Lewis, WA Forestry Branch, Michigan DNR, Indiana DOF, New York DEC, Maryland DNR and numerous private operations in Maine, Pennsylvania, Oregon, Washington, and California. Prior to joining SCS, he was the founder of a consulting firm in Northern California specializing in sustained yield management, fuel reduction, and forest health management. His professional career also includes silvicultural and ecosystem research for the U.S. Forest Service. Areas of research activities include stand level response to vegetative competition and Long-Term Ecosystem Productivity (LTEP) in the Pacific Northwest.

4.3.3 Assessment Process

The scope of the 2007 annual audit included document review, spending time in the field and office, interviewing management personnel and, as appropriate, interacting with outside stakeholders. The field portion of the audit consisted of the following stops and discussions of relevant issues:

Opening Meeting:

- Discussed two small operator caused fires that occurred during August 2007. Operations were halted due to concerns of tribal members
- Recent harvest activities have focused on SW unit. Total unit is approximately 400 acres. 210 acres were treated prior to shutting down operations.
- The forestry department has done some local seed collection and send seed to the Forest Service nursery
- A road inventory was completed that includes mapping and maintenance data. Signing of the roads is underway and is being redesigned to facilitate travel for fire protection equipment. Discussed resources available to fund road maintenance.

- Reviewed plans to have contractor chip slash piles next to landings throughout old harvest blocks.

Soldier Creek Watershed:

- Viewed spring areas and adjacent watercourse
- Area is fenced to exclude cattle
- No recent operations have occurred within the watershed area

Juniper 2 harvest unit:

- Juniper dominated stand classified as commercial timberland. Plan is accomplish stand conversion to low elevation Ponderosa Pine.
- Most Juniper mechanically cut and skidded to roadsides. Operations done during dry period and very little soil disturbance was observed. Trees spread out along road to facilitate firewood cutting.
- Identified archaeological site protected
- Seed will be collected from lower elevation pine for planting
- Scatted Juniper and all pine left for retention within unit.

SW Timber Sale

- Area currently being harvested; “stand improvement cut” being used to accomplish pine conversion
- Many white fir left to provide good site occupancy where pines were not present. Trees in residual stand appeared healthy with dense, full crowns. Residual stocking estimated to be 75 ft² of basal area per acre.
- As with other units, underplanting of pine will help to accomplish conversion
- Discussed effects of leaving white fir overstory and potential need to precommercial thin the unit to control fir establishment in the future.

2.4 4.3.4 Status of Corrective Action Requests

CAR 2003.3	Reference: Criterion 6.9
A noxious weed control strategy and plan should be developed, with input from relevant agency personnel and experts, and implemented to ensure that logging operations and associated soil disturbance do not result in introduction, uncontrollable spread, and irreversible ecological changes due to invasive exotic plants. This plan should be created as an addendum to the current forest management plan and must be provided to SCS prior to the time of the first annual audit.	
Action Taken By Company/Auditor Comments	
Noxious weeds were inventoried and mapped by the Bureau of Land Management through a tribal outreach program. The Fort Bidwell forestry office was somewhat unsatisfied with the work because they felt it they did not have adequate input in the process. A new working group is being created that may focus some noxious weed work towards forestry uses. The management plan has not yet been amended, as the forest managers are waiting to include the addendum as part of a revision of the plan later this year.	
Auditor Comments (November, 2006)	
The addendum has yet to be adopted by the Tribal Council. The forest managers presented the following justification for the delay: In February, 2006, the Tribal Council created an interdisciplinary Integrated Resource Management Plan (IRMP) Committee to draft an IRMP for the entire reservation. Invasive	

<p>species will be addressed in the context of each resource managed on the reservation in the IRMP. Therefore, under the forest management section, an invasive species control strategy will be developed. Ft. Bidwell is in partnership with the local BLM office to address invasives found in the valley. The BLM field staff representative will be responsible for drafting the invasive species control strategy for each resource in the IRMP. The IRMP Committee feels it is prudent to allow the BLM representative to finish her work before finalizing and adopting an addendum to the Forest Management Plan. The auditor was assured that this process was ongoing and would be completed within the next few months. Additionally, invasive species monitoring is in the forefront of the managers' concerns and a considerable amount of thought is being applied to this problem.</p> <p>An extension of this CAR granted so that the IRMP Committee can send an addendum to the Tribal Council for approval. The Council must approve a completed invasive species control strategy as an addendum to the Forest Management Plan by the 2007 annual audit.</p>
<p>Auditor Comments (October, 2007)</p> <p>The BLM field staff representative was transferred before the control strategy could be completed and the position has not been backfilled. Therefore, the Fort Bidwell tribal forester has submitted a plan to SCS to hire a professional botanist to conduct a systematic survey and mapping of invasive exotic plants. Following the survey the botanist will prepare a plan to control the noxious weeds. The map and data will be integrated into the FBIR GIS. Based on uncontrollable circumstances related to the BLM, the deadline for the control strategy shall be extended until the 2008 Annual Audit.</p>
<p>Position in the end of this audit: Open</p>

CAR 2003.5	Reference: Criterion 9.1
<p>The operation must formally designate the Soldier Creek Watershed area as a high conservation value forest, and develop written guidelines for management activities within the designated area to ensure that the specific conservation attributes (i.e., water quality and quantity) are safeguarded from any potential negative impacts of forest management. This must be done in an addendum to the forest management plan and should be made available to SCS prior to the time of the first annual audit.</p>	
<p>Action Taken By Company/Auditor Comments</p> <p>Forest maps have set aside the Soldier Creek Watershed area as a special conservation area. Currently no harvesting is taking place in the watershed, and there are no future harvesting plans. The extreme slopes in the watershed currently preclude harvesting. They may enter the area in 2008 if cable yarding projected to be done in 2007 can be accomplished without impacting water quality or quantity. Official changes to the forest management plan have not been made, as the plan is currently being re-written to accommodate additional acreage added to the reservation. The next draft of the management plan is expected to be completed in late summer 2006.</p>	
<p>Auditor Comments (November, 2006)</p> <p>The forest manager presented draft management guidelines for the Soldier Creek Watershed. These guidelines have yet to be adopted by the Ft. Bidwell Tribal Council and placed as an addendum to the Forest Management Plan.</p> <p>In February, 2006, the Tribal Council created an interdisciplinary Integrated Resource Management Plan (IRMP) Committee to draft an IRMP for the entire reservation. This committee has been given the responsibility to coordinate all planning activities on the reservation including revisions or addendums to the Forest Management Plan. Accordingly, management guidelines for the Soldier Creek Watershed must now pass through the IRMP Committee before being adopted by the Tribal Council. The auditor feels this is an approach that will ensure the final guidelines are more comprehensive and acceptable to the entire tribal community.</p> <p>Whereas the IRMP Committee is relatively new and many procedural details must be developed, it is understandable that this CAR could not be closed during the November, 2006 annual audit. Therefore, a 6 month extension of this CAR will be given. The IRMP Committee must approve management guidelines</p>	

for the Soldier Creek Watershed by February, 2007. Following that approval the final guidelines must be adopted by the Tribal Council as an addendum to the Forest Management Plan by April, 2007.
Auditor Comments (October, 2007) The management guidelines were submitted as required and interim rules prohibit operations until they are approved; however, the Tribal Council has not able to establish the quorum necessary to adopt the Soldier Creed Watershed guidelines. As a result, no operations are planned or have been undertaken within the watershed. The CAR shall be due prior to any operations taking place within the watershed.
Position in the end of this audit: Open

Background/Justification: In 1996, the Ft. Bidwell community initiated the 638 process with the BIA and assumed control of forest management on the reservation. Accordingly, new management objectives were developed. These objectives essentially amounted to a new silvicultural regime for the forest property. No corresponding estimate of annual allowable cut was developed for this new approach. Therefore, it is impossible to determine if the projected rate of harvest can be permanently sustained.	
CAR 2006.1	The forest managers must calculate a new annual allowable cut based on the new forest management objectives and produce harvest projections based on the current Forest Management Plan objectives. Included in this calculation must be the year in which growth will meet or exceed harvest for the rolling ten-year average. The annual allowable cut must be attached to the Forest Management Plan as an addendum before the spring of 2007.
Deadline	May 2007
Reference	FSC Criterion 5.6
Status: Closed	Ft. Bidwell has submitted the new annual allowable cut calculations. As the future silvicultural methods to be used after the stand conversions are completed have not been established, it is not reasonable to attach the present calculations to the Forest Management Plan. At the end of this current planning cycle (2010) the Plan will be updated and a new AAC calculation will be completed based on the continued management direction to be decided at that time.

4.3.5 General Observations

Ft. Bidwell is making good progress towards attaining the Desired Future Condition of the forested stands. It is expected that as this work continues, the forest will become much more fire resistant as it is transitioned towards the pre-European settlement condition. Current operational challenges include road maintenance and tree planting needs. It appears funds are available and the managers are focused on accomplishing these tasks.

4.3.6 New Corrective Action Requests and Recommendations

No new corrective action requests are issued as a result of the 2007 Annual Audit.

4.3.7 General Conclusions of the Annual Audit

Based upon information gathered through site visits, interviews, and document reviews, the SCS auditor concludes that the forest management of Fort Bidwell continues to be in strong overall conformance to the FSC Principles and Criteria, as elaborated by the Pacific Coast Regional Guidelines. That is, while there remain aspects of the management program that are deficient relative to the standard of certification, the SCS auditor has concluded from this annual audit that Fort Bidwell's forest management program is in general conformance with FSC Principles 1 through 9. As such, continuation of the certification is warranted, subject to ongoing progress in closing out the two open CARs and subsequent annual audits

5.0 PUBLIC INFORMATION ABOUT THE FOREST MANAGEMENT PLAN AND MONITORING

A public summary of the management plan for the Fort Bidwell Reservation will be available by request within one year of the date of the certificate.