

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

**The Grand Traverse Regional Land Conservancy (GTRLC)**

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

**CERTIFICATION REGISTRATION NUMBER  
SCS-FM/COC-00113N**

**Submitted to:**

**The Grand Traverse Regional Land Conservancy  
3860 North Long Lake Road, Suite D  
Traverse City, MI 49684**

**Lead Author: Sterling Griffin**

**Date of Field Audit: November 20-21, 2007**

**Date of Report: February 25, 2008  
Updated: February 2010 (See Section 6.1)**

**Certified: 12/08/2008**

**By: Sterling Griffin**

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## **Organization of the Report**

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the SCS website ([www.scs-certified.com](http://www.scs-certified.com)) no less than 30 days after issue of the certificate. Section B contains more detailed results and information for the use of the GTRLC.

## **FOREWORD**

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by the Grand Traverse Regional Land Conservancy to conduct a certification evaluation of its Arcadia Dunes forest property. 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 November 2007, a natural resource specialist was empanelled by SCS to conduct the evaluation. The auditor collected and analyzed written materials, conducted interviews and completed a 2 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 auditor determined conformance to the 56 FSC Criteria 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 GTRLC for the management of its Arcadia Dunes forest property. In the event that a certificate is awarded, Scientific Certification Systems will post this public summary of the report on its web site ([www.scs-certified.com](http://www.scs-certified.com)).

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## SECTION A- PUBLIC SUMMARY AND BACKGROUND INFORMATION

### 1.0 GENERAL INFORMATION

#### 1.1 FSC Data Request

Applicant entity	Grand Traverse Regional Land Conservancy
Contact person	Vic Lane
Address	3860 N. Long Lake Road, Suite D, Traverse City, MI 49684
Telephone	(231) 929-7911
Fax	(231) 929-0433
E-mail	<a href="mailto:vlane@gtrlc.org">vlane@gtrlc.org</a>
Certificate Number	SCS-FM/COC-00113N
Certificate/Expiration Date	12/8/2008 – 12/8/2013
Certificate Type	Single FMU
SLIMF	A single SLIMF
Number of FMU's	One
Number of FMUs in scope that are less than 100 ha in area	
100 - 1000 ha in area	1
1000 - 10 000 ha in area	
more than 10 000 ha in area	
Location of certified forest area	
Latitude	44.763
Longitude	-85.621
Forest zone	Temperate
Total forest area in scope of certificate which is included in FMUs that:	
are less than 100 ha in area	
are between 100 ha and 1000 ha in area	
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	2163 acres
Total forest area in scope of certificate which is:	
privately managed <sup>1</sup>	2163 acres
state managed	
community managed <sup>2</sup>	
Number of forest workers (including contractors) working in forest within scope of certificate	8
Area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	315+
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	TBD, Steep slopes may be used for collecting of maple sap for syrup production.
Area of forest classified as 'high conservation value	315+

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

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

forest'	
List of high conservation values present <sup>3</sup>	<i>HCV3 and HCV4 (forested dunes, Great Lakes coastal forest, boreal pocket, hardwood-conifer swamp)</i>
Chemical pesticides used	Glyphosate for garlic mustard (invasive) removal
Total area of production forest (i.e. forest from which timber may be harvested)	1848 acres
Area of production forest classified as 'plantation' for the purpose of calculating the Annual Accreditation Fee (AAF)	
Area of production forest regenerated primarily by replanting <sup>4</sup>	none
Area of production forest regenerated primarily by natural regeneration	<1848 acres
List of main commercial timber and non-timber species included in scope of certificate (botanical name and common trade name)	sugar maple ( <i>Acer saccharum</i> ), American beech ( <i>Fagus grandifolia</i> ), red oak ( <i>Quercus rubra</i> ), white ash ( <i>Fraxinus americana</i> ), cherry ( <i>Prunus serotina</i> ), basswood ( <i>Tilia virginiana</i> ), aspen ( <i>Populus tremuloides</i> and <i>Populus grandidentata</i> ), ironwood ( <i>Ostrya virginiana</i> ), red pine ( <i>Pinus resinosa</i> ), white Pine ( <i>Pinus strobus</i> )
Approximate annual allowable cut (AAC) of commercial timber	<i>m<sup>3</sup> or bd ft by species</i>
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	Maple Syrup production from trees on steep slopes is allowed, no estimates on future production are available.
List of product categories included in scope of joint FM/COC certificate and therefore available for sale as FSC-certified products (include basic description of product - e.g. round wood, pulp wood, sawn timber, kiln-dried sawn timber, chips, resin, non-timber forest products, etc.)	Round wood Pulp wood Chips

## Conversion Table English Units to Metric Units

### Length Conversion Factors

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

### Area Conversion Factors

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

### Volume Conversion Factors

#### Volume

<u>To convert from</u>	<u>to</u>	<u>multiply by</u>
cubic foot (cu ft)	cubic meter (cu m)	0.02831685

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

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

gallon (gal)                      liter    4.546

1 acre                                      = 0.404686 hectares

1,000 acres                              = 404.686 hectares

1 board foot                              = 0.00348 cubic meters

1,000 board feet                        = 3.48 cubic meters

1 cubic foot                                = 0.028317 cubic meters

1,000 cubic feet                        = 28.317 cubic meters

Breast height                              = 1.4 meters, or 4 1/2 feet, above ground level

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

### **1.2.1 Environmental Context**

The regional landscape surrounding the GTRLC property is that of diverse glacial landforms including moraine ridges, outwash plains, and lake plains. The property is found within the landscape ecosystem Subsection VII.4 Manistee, which lies along the west coast of Michigan from Muskegon County in the south to Leelanau County at its northern extent. The general topography of the region is rolling terrain with some steep ridges and flatter outwash and lake plains. The shoreline of Lake Michigan is characterized by steep bluffs, dunes, and embayment lakes. The climate of this landscape ecosystem is greatly influenced by the moderating effect of Lake Michigan, which increases the growing season and minimizes extremes in temperature.

Existing in the unique microclimate along the shore of Lake Michigan, this coastal forest has unique floral diversity and richness that provides forested habitat in an important bird migration corridor.

The forest consists primarily of second and third growth hardwood forests. Prior to acquisition by GTRLC, many of the stands were selectively logged to remove only the best quality trees or have been managed under the single-tree selection system for decades. Other stands have reverted from old field, pasture, or abandoned orchards. The majority of these stands have poor form, inadequate age class structure, lack proper representation of indigenous tree species, and have sparse understory vegetation.

### **1.2.2 Socioeconomic Context**

The State of Michigan has a total population of approximately 10 million people, with the major population centers located in the southern half of the Lower Peninsula. Michigan is a major timber state whose forest resources are an important part of the nation's wood supply. There are 19 million acres of forestland in the state with 44% in the ownership of non-industrial private landowners. The state forests are an important source of pulpwood, sawlogs and veneer logs. Including recreation-driven economic activity, the Michigan state forests supports approximately 200,000 jobs (directly and indirectly) and generates some \$12 billion in total economic activity, annually (Source: DNR web site).

### **1.3 Forest Management Enterprise**

#### **1.3.1 Land Use**

The property was consolidated over the last 35 years by Consumers Energy Company through the purchase of many individual properties. The intended use of the land was to create a water retention basin that would be used to derive electricity during peak energy usage hours. Since that time, Consumers Energy Company decided not to construct the basin and sold the property to GTRLC in 2003.

Most of the property had previously been farmed, grazed, or otherwise managed in separate ownership. Most of the forest stands reflect specific management history of the parcel. Much of the property has been leased to farmers since the time it was originally purchased by Consumers. The forestland on the property has been considered quasi-public land for decades since neither Consumers nor the leaseholders restricted public use. As a result, the use of this land for recreational purposes by locals has become a cultural expectation.

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

GTRLC does not currently manage other properties with significant timber resources. The remaining land in their ownership is protected for sensitive and unique habitat with little or no active forest management. Additional forestland may be submitted for certification in the future.

### **1.4 Management Plan**

#### **1.4.1 Management Objectives**

GTRLC Forest Management Plan Objectives:

- To protect the integrity of sensitive natural communities and habitat for threatened/endangered species
- To restore and maintain native plant communities and improve habitat for native wildlife species
- To incorporate ecosystem and landscape level planning to managed forestlands
- To implement forestry and stewardship practices which encourage economic and recreational opportunities that are compatible with conservation goals
- To produce forest products in a manner that is not only sustainable, but is consistent with natural processes
- To produce regular income from the sale of timber products to fund stewardship and acquisition of Conservancy lands, while reinvesting appropriately in practices which maintain and improve forest ecology
- To promote the concept of sustainable forestry and voluntary enrollment in sustainable forest plans

#### **1.4.2 Forest Composition**

The forest is predominately Maple-Ash-Beech northern hardwood forest and Oak dominated northern hardwood forest. There are 130 acres of aspen stands resulting from older clear cutting or old-field conversions and 120 acres of old pine plantations. A Hardwood-conifer swamp lies at the northern extent of the property.

### **1.4.3 Silvicultural Systems**

Group Selection: Groups or trees are selected for harvest to promote under-represented mid-shade tolerant and shade tolerant species.

Shelterwood: The harvest system is used for stands with a goal of regenerating oak. This method reduces canopy cover to around 65% through the removal of suppressed or intermediate trees while leaving large healthy oaks for acorn reproduction.

Thinning from Below: This management method is used to remove suppressed and poorly formed intermediate stems from any stand. This method is frequently used in conifer plantations or other young stands where dense small diameter trees restrict understory light and tree vigor.

Clearcut: This method is used exclusively for aspen regeneration and some overgrown exotic conifer plantations.

### **1.4.4 Management Systems**

The Arcadia Dunes forested property is considered one FMU and is the only property within the scope of the certificate. A well developed management plan is in place for the property and is implemented by consulting foresters and contract logging operators.

### **1.4.5 Monitoring System**

The monitoring system is designed to assess forest conditions and the effects of the forest management plan. The plan includes annual monitoring for forest health and high-risk invasive species, post-practice monitoring for the success of treatments, and post-practice monitoring for invasive species. Continuous Forest Inventory plots have been established to monitor forest growth and structural changes through time.

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

The desired future condition is to move the young stands to older mature stands through time. The ultimate DFC has yet to be quantitatively defined and is not expected to be attained for many decades. The intent is to grow significantly more volume than is being harvest in restoration cuts.

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

GTRLC has estimated harvesting will average approximately 100-150 acres per year for the period 2006-2016.

#### **1.4.8 Chemical Pesticide Use**

GRTLTC does not currently use any chemical pesticides on the property, except occasional use of glyphosate for the purpose of controlling invasive species such as garlic mustard.

#### **1.5 SLIMF Qualifications**

GRTLTC is considered a SLIMF based on the size of the property. Total acres available under the management plan are less than the SLIMF threshold.

### **2.0 GUIDELINES/STANDARDS EMPLOYED**

As the applicant forest property is located in northern Michigan, the certification evaluation that is the subject of this report was conducted against the duly-endorsed FSC Lake-States-Central Hardwood Regional Standard v3.0. The standard is available at the FSC-US web site ([www.fscus.org](http://www.fscus.org)) or is available, upon request, from Scientific Certification Systems ([www.scscertified.com](http://www.scscertified.com)).

### **3.0 THE CERTIFICATION ASSESSMENT PROCESS**

#### **3.1 Assessment Dates**

The assessment occurred November 20-21, 2007.

#### **3.2 Assessment Team**

**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 forest management. He is a graduate of Purdue University with a B.S in Forestry and has conducted Forest Stewardship Council (FSC) endorsed assessments on over 6 million acres of forestland in North and South America. Recent FSC assessments have included public lands administered by 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 private consulting firm in Northern California specializing in sustained yield management, fuels 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.

### **3.3 Assessment Process**

#### **3.3.1 Itinerary**

November 20, 2007 – Field visit to the forest property

November 21, 2007 – Office visit and consultation

#### **3.3.5 Stakeholder Consultation**

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

To solicit input from affected parties as to the strengths and weaknesses of GTRLC management, relative to the standard, and the nature of the interaction between the company and the surrounding communities.

To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests.

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

- GTRLC employees, including headquarters and field
- contractors
- adjacent property owners
- Members of the Lake States FSC Working Group/National Initiative
- FSC International
- Local and regionally-based environmental organizations and conservationists
- Local and regionally-based social interest organizations
- Purchasers of logs harvested on GTRLC forestlands
- Local, State and Federal regulatory agency personnel
- User groups, such as hikers, ATV users, and others
- Other relevant groups

Prior to, during, and following the site evaluation, a wide range of stakeholders from the regional area were consulted in regard to their relationship with the GTRLC, and their views on the management of the GTRLC Forest. 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.

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

A summary of the comments on the standard (where applicable) and major perspectives and concerns expressed by the stakeholders that were consulted during the course of this evaluation include:

#### Economic Concerns

Comment/Concern	Response
<ul style="list-style-type: none"> <li>GTRLC should work to ensure forest products are processed and manufactured locally. Logs should not be sent out of local area.</li> </ul>	GTRLC is considering this input, but options are limited.
<ul style="list-style-type: none"> <li>Contractors are paid well and in timely manner</li> </ul>	Comment noted.

#### Social Concerns

Comment/Concern	Response
<ul style="list-style-type: none"> <li>Concerned about local recreation users reaction to timber harvesting operations.</li> </ul>	GTRLC provides notification of activities and monitors input.
<ul style="list-style-type: none"> <li>Happy to see GTRLC seeking certification</li> </ul>	Comment noted.
<ul style="list-style-type: none"> <li>Agree with objectives of Forest Management Plan</li> </ul>	Comment noted.

#### Environmental Concerns

Comment/Concern	Response
<ul style="list-style-type: none"> <li>Concerns with GTRLC ability to regenerate Black Cherry and Basswood.</li> </ul>	The Desired Future Condition generally does not focus on these shade-intolerant species.
<ul style="list-style-type: none"> <li>There is potential for Emerald Ash Borer and Beech Bark disease to significantly alter the forest composition</li> </ul>	Both of the diseases are addressed in the management plan
<ul style="list-style-type: none"> <li>Would like to see maintenance of early successional species</li> </ul>	Maintenance of Aspen stands is component of management plan
<ul style="list-style-type: none"> <li>There may be unique opportunities to manage for species that require marine type environments.</li> </ul>	GTRLC managers are aware of unique microclimates on the property and focus on restoration opportunities.

### **3.4 Total Time Spent on audit**

One auditor day was spent reviewing documents and conducting stakeholder interviews. Two auditor days were spent conducting the field visits and two days were spent writing the assessment report. In all, a total of 5 auditor days were spent assessing GTRLC for conformance with the FSC Lake States Standard.

### **3.5 Process of Determining Conformance**

FSC accredited forest stewardship standards consist of a three-level hierarchy, principle, then the criteria that make up that principle, then the indicators that make up each criteria. Consistent with SCS Forest Conservation Program evaluation protocols, the team collectively determines whether or not the subject forest management operation is in conformance with every applicable indicator of the relevant forest stewardship standard. Each non-conformance must be evaluated to determine whether it constitutes a major or minor non-conformance at the level of the associated criterion or sub-criterion. Not all indicators are equally important, and there is no simple numerical formula to determine whether an operation is in non-conformance. The team must use their collective judgement to assess each criterion and determine if it is in conformance. If the forest management operation is determined to be in non-conformance at the criterion level, then at least one of the indicators must be in major non-conformance.

Corrective action requests (CAR's) are issued for every instance of non-conformance. Major non-conformances trigger major CAR's and minor non-conformances trigger minor CAR's

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

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

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

*Recommendations:* These are 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-conformance.

#### **4.0 RESULTS OF THE EVALUATION**

Table 4.1 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 corrective action request (car) numbers related to each principle.

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

Principle/Subject Area	Strengths Relative to the Standard	Weaknesses Relative to the Standard	CAR/REC #s
<b>P1: FSC Commitment and Legal Compliance</b>	<ul style="list-style-type: none"> <li>▪ Harvest contracts require Best Management Practices (BMP) to be followed.</li> <li>▪ There are no serious illegal uses or unauthorized activities occurring on the property. The property is generally open to the public for recreation and volunteers provide good feedback on the condition of the property.</li> </ul>	<ul style="list-style-type: none"> <li>▪ None noted</li> </ul>	
<b>P2: Tenure &amp; Use Rights &amp; Responsibilities</b>	<ul style="list-style-type: none"> <li>▪ Property boundaries are well marked.</li> <li>▪ While there are no legal and customary rights, GTRLC does allow the general public to recreate on the property.</li> </ul>	<ul style="list-style-type: none"> <li>▪ None noted</li> </ul>	
<b>P3: Indigenous Peoples' Rights</b>	<ul style="list-style-type: none"> <li>▪ The project manager has consulted with the local tribe to identify cultural sites.</li> </ul>	<ul style="list-style-type: none"> <li>▪ None noted.</li> </ul>	
<b>P4: Community Relations &amp; Workers' Rights</b>	<ul style="list-style-type: none"> <li>▪ GTRLC works closely with the contractors to provide fair compensation for the unique types of operations they prefer.</li> <li>▪ Many education seminars and nature walks are provided by GTRLC</li> <li>▪ GTRLC is well connected with local economy, maintains a well staffed local office and is involved in a whole host of non-forestry related conservation efforts.</li> </ul>	<ul style="list-style-type: none"> <li>▪ None noted.</li> </ul>	
<b>P5: Benefits from the Forest</b>	<ul style="list-style-type: none"> <li>▪ GTRLC appears to be making provisions for long-term reinvestment in the property.</li> <li>▪ Timber sales are small and open to competitive bidding process.</li> </ul>	<ul style="list-style-type: none"> <li>▪ An estimate of property-wide growth has not been calculated.</li> </ul>	<ul style="list-style-type: none"> <li>▪ CAR 2008.6</li> </ul>

<b>P6: Environmental Impact</b>	<ul style="list-style-type: none"> <li>▪ GTRLC has consulted the Michigan Natural Features Inventory to identify listed species occurrences and has conducted a Rapid Ecological Assessment of forested stands.</li> <li>▪ Landscape-level considerations are incorporated into the forest management plan. The uniqueness of habitats within the forested property is recognized and maintained.</li> <li>▪ GTRLC is a leader in conserving native plant and animal communities. There is cooperation with various state and local agencies to advance conservation of rare plants and animals.</li> <li>▪ Contractors are required to follow state Best Management Practices (BMP).</li> </ul>	<ul style="list-style-type: none"> <li>▪ Assessment information needs to be compiled into a standardized environmental impact assessment document.</li> <li>▪ Mitigations to prevent to the spread of invasive exotic species are not formally described in enforceable language in the Timber Sale Contracts.</li> <li>▪ Green tree retention standards have not been developed for even-aged regeneration cuts.</li> </ul>	<ul style="list-style-type: none"> <li>▪ CAR 2008.2</li> <li>▪ CAR 2008.3</li> <li>▪ CAR 2008.4</li> </ul>
<b>P7: Management Plan</b>	<ul style="list-style-type: none"> <li>▪ The Forest Management Plan is well written and provides a clear understanding of the management objectives and preferred operational methods.</li> <li>▪ Landscape-level considerations are incorporated in the development of the management plan.</li> <li>▪ Well trained and qualified foresters and contractors are used to implement the management plan.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Silvicultural prescriptions are not defined in clear quantitative terms.</li> </ul>	<ul style="list-style-type: none"> <li>▪ CAR 2008.1</li> </ul>
<b>P8: Monitoring &amp; Assessment</b>	<ul style="list-style-type: none"> <li>▪ Harvest contracts require BMPs to be followed.</li> <li>▪ There are no serious illegal uses or unauthorized activities occurring on the property. The property is generally open to the public for recreation and volunteers provide good feedback on the condition of the property.</li> </ul>	<ul style="list-style-type: none"> <li>▪ None noted</li> </ul>	
<b>P9: Maintenance of High Conservation Value Forest</b>	<ul style="list-style-type: none"> <li>▪ Property boundaries are well marked.</li> <li>▪ While there are no legal and customary rights, GTRLC does allow the general public to recreate on the property.</li> </ul>	<ul style="list-style-type: none"> <li>▪ None noted</li> </ul>	

## 4.2 Preconditions

Preconditions are major corrective action requests that are placed on a forest management operation after the initial evaluation and before the operation is certified. Certification cannot be awarded if open preconditions exist.

No preconditions were placed on GTRLC during the initial evaluation.

## 5.0 CERTIFICATION DECISION

### 5.1 Certification Recommendation

As determined by the full and proper execution of the SCS *Forest Conservation Program* evaluation protocols, the evaluation team hereby recommends that the GTRLC be awarded FSC certification as a “Well-Managed Forest” subject to the corrective action requests stated in Section 5.2. GTRLC has demonstrated that their system of management is capable of ensuring that all of the requirements of the Lake States-Central Hardwood Regional standards are met over the forest area covered by the scope of the evaluation. GTRLC has also demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate.

### 5.2 Initial Corrective Action Requests

<b>Background/Justification:</b> Silvicultural prescriptions should be well defined and available to people reviewing and implementing the prescriptions.	
<b>CAR 2008.1</b>	GTRLC must develop and implement a comprehensive Timber Harvesting Plan document that will be completed prior to harvesting and shall include a description of current stand conditions, target stand description, quantitative silvicultural prescriptions, and follow up needs.
<b>Deadline</b>	2009 Annual Audit
<b>Reference</b>	<i>FSC Criterion 7.1.c.2</i>

<b>Background/Justification:</b> Prior to the commencement of management activities, potential short-term environmental impacts and their cumulative effects must be evaluated. GTRLC is currently conducting this type of analysis; however, there is no comprehensive summary being presented for site specific operations.	
<b>CAR 2008.2</b>	GTRLC must develop and implement a Pre-Harvest Impact Assessment Checklist that documents occurrences of list species and/or their habitats, water resources to be protected, occurrences of cultural resources, measures to control erosion, and mitigations for road and landing construction.
<b>Deadline</b>	2009 Annual Audit

<b>Reference</b>	<i>FSC Criterion 6.1.a</i>
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<b>Background/Justification:</b> Forest owners or managers must develop and implement control measures for invasive exotic species.	
<b>CAR 2008.3</b>	GTRLC must develop written guidelines to minimize the risk of spreading invasive species during harvest activities. Guidelines must be included in harvest contracts.
<b>Deadline</b>	2009 Annual Audit
<b>Reference</b>	<i>FSC Indicator 6.9.d</i>

<b>Background/Justification:</b> When even-aged management is employed, live trees, and native vegetation must be retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime in each community type.	
<b>CAR 2008.4</b>	GTRCL must develop green tree retention standards to be used in even-aged aspen regeneration cuts.
<b>Deadline</b>	2009 Annual Audit
<b>Reference</b>	<i>FSC Indicator 6.3.a.5</i>

<b>Background/Justification:</b> GTRLC has special designations for various sites that are managed for high conservation value purposes; however, this not yet a comprehensive list of HCVF areas for the forestlands.	
<b>CAR 2008.5</b>	GTRLC must provide a list of HCVF areas along with mapped locations and management guidelines used to enhance/restore the high conservation value attributes.
<b>Deadline</b>	2009 Annual Audit
<b>Reference</b>	FSC Principle 9

<b>Background/Justification:</b> After the species composition and the age-class distribution commensurate with GTRLC management objectives has been achieved, harvest and growth records must demonstrate that the volume harvested during any 10-year span is less than the net growth accumulated over that same period.	
<b>CAR 2008.6</b>	GTRLC must use inventory data to estimate property-wide volume growth in order to provide metrics to make a determination of compliance with sustained yield requirements.
<b>Deadline</b>	2009 Annual Audit
<b>Reference</b>	FSC Indicator 5.6.a, 7.1.d.1

**Recommendations:**

<b>Background/Justification:</b> There are opportunities to expand and improve the CFI system. The plots can include additional ecological data that may prove useful in adaptive management efforts.	
<b>REC 2008.1</b>	The CFI design should include data collection efforts to capture data on percent canopy cover, herbaceous species cover, and coarse

	woody debris transects. In addition, a methodology should be developed to expand the CFI to other stands including using a stratified sample design to reduce costs.
<b>Reference</b>	<i>Indicator 8.2.c.1</i>

**Background/Justification:** Current marking guidelines appear to create small openings for regeneration with standard thinning-from-below throughout the “matrix” of the units. This approach achieves higher growth rates and better spacing, but often eliminates structural diversity by removing defective trees with unique structures that provide habitat and facilitate many important ecosystem processes.

<b>REC 2008.2</b>	In order to develop more structural diversity within single tree selection prescriptions, GTRLC could incorporate marking guides that include small groups of trees with higher densities. Defective trees with forked tops and cancers that have high ecological value should be retained.
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<b>Reference</b>	<i>FSC Indicator 7.1.c</i>
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**Background/Justification:** GTRLC is attempting to protect sensitive sites and has preferred not to mark these sites on the ground to prevent their discovery by the general public. However, it is important that harvest contractors have sites marked to prevent unintended impacts.

<b>REC 2008.3</b>	Where sensitive features exist, including confidential locations of plants or cultural sites, GTRLC should consider using “Equipment Exclusion Zones” with ELZ flagging on the ground.
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<b>Reference</b>	<i>FSC Criterion 6.2</i>
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**Background/Justification:** As GTRLC begins to develop its forestry program it would be useful to document policies and procedures so that others within the program can understand and improve upon procedures.

<b>REC 2008.4</b>	GTRLC should compile a policies and procedures manual to document internal methods of accomplishing forest management objectives.
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## 6.0 SURVEILLANCE EVALUATIONS

If certification is awarded, surveillance evaluations will take place at least annually to monitor the status of any open corrective action requests and review the continued conformance of GTRLC to the Lake States-Central Hardwood Regional Standard. Public summaries of surveillance evaluations will be posted separately on the SCS website ([www.scscertified.com](http://www.scscertified.com)).

### 6.1.0 2009 ANNUAL AUDIT

#### 6.1.1 Assessment Dates

In 2009- SCS conducted a desk audit, which took place on December 17, 2009

## **6.1.2 Assessment Personnel**

This annual audit was conducted by Dave Wager.

Mr. Wager is Director of Forest Management Certification for SCS. During his 9 years as Director, Mr. Wager has administered the program and led Forest Management and Chain-of-Custody evaluations throughout the world. Mr. Wager has led assessments of 30 forest management operations worldwide including Minnesota DNR, Pennsylvania State Forests, Massachusetts State Forests, Potlatch Corporation's Idaho Forestlands and Oregon Poplar Tree Farm, Wisconsin County Forests, Collins Pine Company, Department of Defense-Fort Lewis Installation, and operations in Brazil, Canada, Costa Rica, Japan, and Malaysia.

In his role as Program Director, Mr. Wager oversees all first-time certification evaluations, annual audits, and contract renewal certifications on approximately 85 active certificate holders covering 30 million acres. In other natural resources work, Mr. Wager played a key role in the development of Starbucks CAFE Practices- a program to ensure procurement of sustainably grown and processed coffee. Mr. Wager has expertise in business and forest ecology (B.S. business, Skidmore College; M.S. Forest Resources, Utah State University) and utilizes both in his position with SCS. While studying forest ecology at Utah State University, Mr. Wager was awarded a NASA Graduate Student Research Fellowship to develop dendrochronological techniques to assess Douglas-fir growth in Utah's Central Wasatch Mountains.

## **6.1.3 Assessment Process**

### **6.1.3.1 Itinerary**

Dec 17- Phone based audit with SCS and GTRLC

#### **Individuals Present:**

Dave Wager, SCS

Vic Lane, GTRLC

Paul Drysdale, GTRLC forest consultant

#### 6.1.4 Status of Corrective Action Requests

<b>Background/Justification:</b> Silvicultural prescriptions should be well defined and available to people reviewing and implementing the prescriptions.	
<b>CAR 2008.1</b>	GTRLC must develop and implement a comprehensive Timber Harvesting Plan document that will be completed prior to harvesting and shall include a description of current stand conditions, target stand description, quantitative silvicultural prescriptions, and follow up needs.
<b>Deadline</b>	2009 Annual Audit
<b>Reference</b>	<i>FSC Indicator 7.1.c.2</i>
<b>Company Actions/Auditor Comments:</b> Timber Harvest Plan documents have been implemented. A sample plan and template was reviewed, which in combination with other planning documents addresses FSC Indicator 7.1.c.2	
<b>Status: Closed</b>	

<b>Background/Justification:</b> Prior to the commencement of management activities, potential short-term environmental impacts and their cumulative effects must be evaluated. GTRLC is currently conducting this type of analysis; however, there is no comprehensive summary being presented for site specific operations.	
<b>CAR 2008.2</b>	GTRLC must develop and implement a Pre-Harvest Impact Assessment Checklist that documents occurrences of list species and/or their habitats, water resources to be protected, occurrences of cultural resources, measures to control erosion, and mitigations for road and landing construction.
<b>Deadline</b>	2009 Annual Audit
<b>Reference</b>	<i>FSC Criterion 6.1.a</i>
<b>Company Actions/Auditor Comments:</b> GTRLC has developed and implemented a pre-harvest impact assessment checklist that covers the requirements under FSC Indicator 6.1.a. A sample checklist and template was reviewed by the SCS auditor. There is considerable overlap with the Harvest Plan checklist- thus there may be some opportunity to combine these into one document.	
<b>Status: Closed</b>	

<b>Background/Justification:</b> Forest owners or managers must develop and implement control measures for invasive exotic species.	
<b>CAR 2008.3</b>	GTRLC must develop written guidelines to minimize the risk of spreading invasive species during harvest activities. Guidelines must be included in harvest contracts.
<b>Deadline</b>	2009 Annual Audit
<b>Reference</b>	<i>FSC Indicator 6.9.d</i>
<b>Company Actions/Auditor Comments:</b> Control measures for invasive species during harvests have been implemented. These measures require the contract logger to clean equipment when moving it in from infested sites. Additionally, GTRLC will initiate removal actions including hand picking and herbicide where feasible. Pre-harvest and post-harvest monitoring for invasives will be the key to early detection, control, and prevention of their spread. The most problematic invasive spp have been identified including garlic mustard, black locust, periwinkle, autumn olive, and honey suckle.	

**Status: Closed**

<b>Background/Justification:</b> When even-aged management is employed, live trees, and native vegetation must be retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime in each community type.	
<b>CAR 2008.4</b>	GTRCL must develop green tree retention standards to be used in even-aged aspen regeneration cuts.
<b>Deadline</b>	2009 Annual Audit
<b>Reference</b>	<i>FSC Indicator 6.3.a.5</i>
<b>Company Actions/Auditor Comments:</b> Upon further review SCS concludes that GTRCL's legacy patch requirements are sufficient to address green tree retention standards in even-aged harvests. Thus, this CAR has been struck	
<b>Status: CAR has been removed</b>	

<b>Background/Justification:</b> GTRLC has special designations for various sites that are managed for high conservation value purposes; however, this not yet a comprehensive list of HCVF areas for the forestlands.	
<b>CAR 2008.5</b>	GTRLC must provide a list of HCVF areas along with mapped locations and management guidelines used to enhance/restore the high conservation value attributes.
<b>Deadline</b>	2009 Annual Audit
<b>Reference</b>	FSC Principle 9
<b>Company Actions/Auditor Comments:</b>  GTRLC completed there HCVF assessment providing the following summary along with maps showing HCVF areas.  <i>While the entire property is being managed as a High Conservation Value Forest (HCVF) under this plan, particular stands in this forest contain exceptional qualities which require addition precaution. These stands have additional harvest restrictions that protect their unique attributes. These High Conservation Value Forest Stands include areas of forested dune, hardwood-conifer swamp, and sites with particularly well developed structure (those with diverse tree species, age classes, and herbaceous and shrubby vegetation). Stands 1a, 6, 16a, and 103 have this special designation as HCVF. These stands cover 315 acres and over 14% of the area covered by this plan.</i>	
<b>Status: Closed</b>	

<b>Background/Justification:</b> After the species composition and the age-class distribution commensurate with GTRLC management objectives has been achieved, harvest and growth records must demonstrate that the volume harvested during any 10-year span is less than the net growth accumulated over that same period.	
<b>CAR 2008.6</b>	GTRLC must use inventory data to estimate property-wide volume growth in order to provide metrics to make a determination of compliance with sustained yield requirements.

<b>Deadline</b>	2009 Annual Audit
<b>Reference</b>	FSC Indicator 5.6.a, 7.1.d.1 Inventory from 2004; average growth rates
<b>Company Actions/Auditor Comments:</b> GTRLC utilized stand data collected in the 2004 inventory in conjunction with multiple Forest Service handbooks and soil surveys from the region as a basis for an estimate of potential growth. The growth estimates are a general estimate of annual property wide volume growth in order to ensure that timber volumes removed during scheduled forest management operations do not exceed timber growth during a given period of time. In the coming years, the GTRLC will collect and analyze detailed data on stand growth through the installation and monitoring of Continuing Forest Inventory (CFI) Plots. Most of the hardwood stands should be capable of growing an average of approximately 300 boardfeet of sawtimber per acre on an annual basis, as well as approximately 1 cord of pulp wood per acre per year. Lower sawtimber growth estimates ranging from 150 - 200 BF/acre/year for some of the pole timber and lower stocked sawtimber stands were used, and GTRLC only utilized cord growth estimates for the sapling size stands which ranged from .75 to 1 cords of growth/acre/year. I utilized an estimate of 2 cords of growth/acre/year for the conifer stands. Based on the above analysis and the low level of past harvest levels- GTRLC is clearly in conformance with FSC Criterion 5.6.	
<b>Status: Closed</b>	

**Recommendations:**

<b>Background/Justification:</b> There are opportunities to expand and improve the CFI system. The plots can include additional ecological data that may prove useful in adaptive management efforts.	
<b>REC 2008.1</b>	The CFI design should include data collection efforts to capture data on percent canopy cover, herbaceous species cover, and coarse woody debris transects. In addition, a methodology should be developed to expand the CFI to other stands including using a stratified sample design to reduce costs.
<b>Reference</b>	<i>Indicator 8.2.c.1</i>
<b>Company Actions/Auditor Comments:</b>  There are plans to establish a CFI system, however, it has not yet been done.	
<b>Status: continued</b>	

<b>Background/Justification:</b> Current marking guidelines appear to create small openings for regeneration with standard thinning-from-below throughout the “matrix” of the units. This approach achieves higher growth rates and better spacing, but often eliminates structural diversity by removing defective trees with unique structures that provide habitat and facilitate many important ecosystem processes.	
<b>REC 2008.2</b>	In order to develop more structural diversity within single tree selection prescriptions, GTRLC could incorporate marking guides that include small groups of trees with higher densities. Defective trees with forked tops and cancers that have high ecological value should be retained.
<b>Reference</b>	<i>FSC Indicator 7.1.c</i>

<b>Company Actions/Auditor Comments:</b>	
GTRLC informed SCS that they are already marking with variable density thinning across the stand. This will be viewed during the next on-site surveillance audit.	
<b>Status: continued</b>	

<b>Background/Justification:</b> GTRLC is attempting to protect sensitive sites and has preferred not to mark these sites on the ground to prevent their discovery by the general public. However, it is important that harvest contractors have sites marked to prevent unintended impacts.	
<b>REC 2008.3</b>	Where sensitive features exist, including confidential locations of plants or cultural sites, GTRLC should consider using “Equipment Exclusion Zones” with ELZ flagging on the ground.
<b>Reference</b>	<i>FSC Criterion 6.2</i>
<b>Company Actions/Auditor Comments:</b>	
This is covered in the pre-harvest logger meeting and through sale administration. The property is dry and lacks sensitive water resources where pre-harvest flagging of equipment exclusion zones is deemed to be necessary.	
<b>Status: closed</b>	

<b>Background/Justification:</b> As GTRLC begins to develop its forestry program it would be useful to document policies and procedures so that others within the program can understand and improve upon procedures.	
<b>REC 2008.4</b>	GTRLC should compile a policies and procedures manual to document internal methods of accomplishing forest management objectives.
<b>Company Actions/Auditor Comments:</b>	
Some initial progress has been made in codifying procedures; however, more work is needed.	
<b>Status: continued</b>	

### 6.1.5 General Observations

There have been no significant organizational changes to GTRLC since the time of original certification. Harvest activities have been slower than originally forecasted because GTRLC is moving more deliberately to ensure that stakeholders understand and support the objectives. Since the time of the original certification, harvests have occurred in Stand 71 and 126. Both of these harvests were described as selection harvests. Based on discussions about pre-harvest assessments, volumes removed, and the silvicultural objectives- both harvests are likely to conform to the FSC standards. At the time of the next on-site audit SCS will assess one or both of these harvest sites.

No complaints have been received by stakeholders and GTRLC has maintains active communication and interaction with 50+ volunteers who assist with a variety of stewardship responsibilities.

The only chemical pesticide used in 2009 was round-up to treat the invasive plant garlic mustard.

### 6.1.6 General Conclusions of the Annual Audit

As determined by the full and proper execution of the SCS *Forest Conservation Program* evaluation protocols, the evaluation team hereby concludes that GTRLC forest management continues to be in strong overall compliance with FSC Principles and Criteria. GTRLC has demonstrated that their system of management is capable of ensuring that all of the FSC requirements are met over the forest area covered by the scope of the evaluation. GTRLC has also demonstrated that the described system of management continues to be implemented consistently over the forest area covered by the scope of the certificate.

## 7.0 SUMMARY OF SCS COMPLAINT AND APPEAL INVESTIGATION PROCEDURES

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

A **complaint** is a written expression of dissatisfaction, other than **appeal**, by any person or organization, to a certification body, relating to the activities of staff of the SCS Forest Conservation Program and/or representatives of a company or entity holding either a forest management (FM) or chain-of-custody (CoC) certificate issued by SCS and duly endorsed by FSC, where a response is expected (ISO/IEC 17011:2004 (E)). The SCS Complaint Investigation Procedure functions as a first-stage mechanism for resolving complaints and avoiding the need to involve FSC.

An “**appeal**” is a request by a certificate holder or a certification applicant for formal reconsideration of any adverse decision made by the certification body related to its desired certification status. A certificate holder or applicant may formally lodge an appeal with SCS against any adverse certification decision taken by SCS, within thirty (30) days after notification of the decision.

The written Complaint or Appeal must:

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

Written complaints and appeals should be submitted to:

Dr. Robert J. Hrubes  
Senior Vice-President  
Scientific Certification Systems

2200 Powell Street, Suite 725  
Emeryville, California, USA94608  
Email: [rhrubes@scscertified.com](mailto:rhrubes@scscertified.com)

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