

**0Forest Management and Stump-to-Forest Gate Chain-of-Custody
Certification Evaluation Report for:**

GreenWood Resources, Inc.

Boardman, Oregon

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

**CERTIFICATION REGISTRATION NUMBER
SCS-FM/COC-00034P**

Submitted to:

**GreenWood Resources, Inc.
(formerly the Potlatch Boardman Poplar Program)**

Lead Author: Dave Wager

**Date of Field Audit: June 13-15, 2006
Date of Final Report: September 1, 2006
Updated: August 2007 (See Section 6.1)
Updated: August 2008 (See Section 6.2)
Updated: October 2009 (See Section 6.3)**

Certified: September 1, 2006

By:

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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) no less than 30 days after issue of the certificate. Section B contains more detailed results and information for the use of the Potlatch Corporation.

FOREWORD

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by Potlatch Corporation to conduct a certification re-evaluation of its Boardman Poplar Program (BPP). 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 June 2006, an interdisciplinary team of natural resource specialists was empanelled by SCS to conduct the evaluation. The team collected and analyzed written materials, conducted interviews and completed a 3 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 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 Potlatch Corporation, for the management of its Boardman Poplar Program Operations. 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).

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SECTION A- PUBLIC SUMMARY AND BACKGROUND INFORMATION

1.0 GENERAL INFORMATION

1.1 FSC Data Request

Applicant entity	GreenWood Resources, Inc., <i>Formerly:</i> Potlatch Corporation- Boardman Poplar Program(BPP)
Contact person	Sales: Lee Jimerson ljimerson@collinsco.com 503-471-2266 Forest Management: Jake Eaton jeaton@greenwoodresources.com 541-481-2620 x 43
Address	PO Box 870, Hermiston, OR 97838
Fax	541-481-2623
Certificate Number	SCS-FM/COC-00034P
Certificate/Expiration Date	September 1, 2006 – September 1, 2011
Certificate Type	Single FMU
Location of certified forest area	
Latitude	119 degrees, 32 minutes West
Longitude	45 degrees, 47 minutes North
Forest zone	Temperate
Total forest area in scope of certificate which is: privately managed ¹	17,300
Number of forest workers (including contractors) working in forest within scope of certificate	40 full time and up to 150 seasonal
Area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	0 on-site; 1700 outside of FMU
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Area of forest classified as 'high conservation value forest'	0
List of high conservation values present ²	NA
Chemical pesticides used	
Total area of production forest (i.e. forest from which timber may be harvested)	~17,300acres
Area of production forest classified as 'plantation' for the purpose of calculating the Annual Accreditation Fee (AAF)	~17,300 acres

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

² 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

Area of production forest regenerated primarily by replanting ³	~17,300 acres
Area of production forest regenerated primarily by natural regeneration	0
List of main commercial timber and non-timber species included in scope of certificate (botanical name and common trade name)	Hybrid poplar
Approximate annual allowable cut (AAC) of commercial timber	35-40 mmbf
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	0
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 and 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
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 Management Context

³ 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.

As a private enterprise located in Oregon, management of the Boardman Poplar Program is subject to a host of local, state and federal regulations. The principal regulations of greatest relevance to forest managers in Oregon are associated with the following statutes:

Pertinent Regulations at the Federal Level:

Endangered Species Act
Clean Water Act (Section 404 wetland protection)
Occupational Safety and Health Act
National Historic Preservation Act
Archaeological and Historic Preservation Act
Americans with Disabilities Act
U.S. ratified treaties, including CITES

Pertinent Regulations at State and Local Level:

Plantation managers with rotations under 12 years are exempt from the Oregon State Forest Practices Act.

Oregon Department of Water Resources water right law that regulates the total flow withdrawal and the instantaneous flow withdrawal from the Columbia River.

State of Oregon minimum wage law.

Regulatory Context for State and Local Regulations:

1.2.1 Environmental Context

The Potlatch Boardman Poplar Program (BPP) is located in the Columbia River Basin of northern Morrow County, Oregon. Climatically, the region is characterized by moderately cold moist winters and hot dry summers with annual precipitation averaging approximately 8 inches per year. Strong westerly winds, originating from the Columbia Gorge, occur in this region at various times throughout the year. There is little topography to the area, elevation on the BPP ranges from 400 to 800 ft above sea level. Most of the soils are classified as sandy or sandy loam and tend to be low in organic matter. Land cover types include cropland e.g., (potatoes, sweet peas, alfalfa, wheat, corn) and shrub-steppe rangeland, which varies in condition from intact with native plant communities of sagebrush, indian ricegrass, antelope bitterbrush, and native bunchgrasses to highly degraded with communities dominated by Russian thistle and cheatgrass. One of the largest contiguous blocks, 40,000 acres, of shrub-steppe rangelands is found directly to the west of the BPP on the Naval Weapons Systems Training Facility.

Irrigated agriculture was made possible in the early 1970's with the John Day Dam. Shortly after the creation of the John Day Dam large-scale conversion of shrub-steppe rangeland to center-pivot irrigated farmland took place.

Irrigation withdrawal is located in the Columbia River, which is a migration stream for several listed salmonoid species. Intake screens are maintained to ensure pumping does not impact these, or other sensitive, fish. The BPP does not have any other rare, threatened, or endangered species on the farm. Adjacent native habitat area do have federal species of concern including the ferruginous hawk, the western burrowing owl, the long-billed curlew, and the Washington ground squirrel.

1.2.2 Socioeconomic Context

From a socio-economic standpoint, the BPP is an important part the regional economies of Boardman, Hermiston and the Tri Cities area (Kennewick, Pasco and Richland). Agriculture is the dominant economic activity in the region; thus Potlatch helps diversify the economy. The BPP operates with a full-time staff of 14 and uses an additional number of outside contractors. If an on-site sawmill is developed, as planned, there will be an estimated 50-150 additional jobs as a result of the BPP.

1.3 Forest Management Enterprise

1.3.1 Land Use

Potlatch's *Long-term Management Plan (2006)* states: "The Potlatch farm is located in the southern portion of the Columbia Basin at elevations between 400 and 800 feet (120-240 meters) above sea level. Farm soils are primarily a Quincy loam, which is predominantly sand with minimal rock, gravel, or hardpan conditions to a depth of at least five feet. Another feature of the area is periodic high wind blowing out of the west through the Columbia Gorge. The hazard of soil erosion due to wind is high on the annual crops grown in the area. Adjacent Lands

The adjacent lands are primarily center pivot irrigated farm ground like the farms purchased for the plantation. There are also three parcels internal to the plantation owned by farmers that are also in center pivot irrigated farm production. Immediately bordering the southeastern corner of the farm is non irrigated rangeland. Some of this property is planned for development to irrigated farm land in the future by the current owner.

There is a large native habitat area to the west of the ownership that is owned by the US Navy for use as a bombing range. On land to the southwest of the Naval bombing range, Potlatch entered into an agreement with The Nature Conservancy (TNC) effective 7/1/05, where the TNC performs the role of a conservation banker on approximately 1700 acres of native grassland habitat."

1.3.2 Land Outside Scope of Certification

Potlatch Corporation has received FSC certification for all four of its divisions.

1.4 Management Plan

1.4.1 Management Objectives

Potlatch's *Long-term Management Plan (2006)* states that the "overriding objective is to be a leader in land stewardship and strive to be a low cost producer of quality wood products. Overall long-term objectives for the PP are:

1. Maintain a leadership position in poplar culture.
2. Develop new high value, long-term markets for western white poplar logs, lumber, and chips.
3. Be an environmental leader in the management and production of high quality poplar saw logs."

1.4.2 Forest Composition

Potlatch's *Long-term Management Plan (2006)* states the "poplar clones are selected elite crosses between several species in the *Populus* genus. Trees are selected for environmental suitability, fiber characteristics, and growth. The trees are grown with agricultural concepts, utilizing intensive weed and pest control, fertilization, and irrigation from the Columbia River. There is a natural diversity of habitat generated from the range in age classes of trees from newly planted to the harvest age of 11. The plantation was initially developed with large contiguous areas, up to 4,000 acres, in the same age class of trees. As we have changed to solid wood management certain clones were determined to be less suitable for solid wood production and have been harvested under the original 7 year rotation. This has developed a mosaic of age classes across the ownership which is more desirable for wildlife habitat. As we plan future fields for harvest we will make an effort to maintain this mosaic and minimize the number of adjacent fields harvested and replanted in the same year."

1.4.3 Silvicultural Systems

Potlatch plantations are managed on an 11-year rotation, by clearcutting followed by replanting. Site preparation includes ripping, tilling, hose lay, and finally pre-plant, weed control. Planting of dormant cuttings is done primarily in April after soil temperatures reach 50 degrees. A combination of spraying and hand weeding are used to control competing vegetation.

Productivity is maximized through the use of irrigation and nutrient supplements. Irrigation water is withdrawn from the Columbia River and delivered to the trees through a series of buried pipes, pump stations, valve manifolds and ultimately the drip tube with pressure compensating emitters. Nutrients are provided through the irrigation system and by returning biomass to the soil through prunings and compost of woody debris.

Potlatch uses a systematic approach for forest health that utilizes regular monitoring and economic thresholds to determine if and when treatments are needed. When control is necessary, all practical control methods are employed, including biological, chemical, physical, cultural, and plant material selection, in a way that minimizes economic and

environmental risks and optimizes production. This approach is consistent with Integrated Pest Management techniques.

The final silvicultural tending is pruning, which is done to increase the amount of clear wood and thus the value of the saw logs being produced on the farm. Pruning begins after the second growing season with the final lift to 25' after the fourth growing season.

1.4.4 Management Systems

The BPP is managed as one management unit. The Poplar Resource and Manufacturing Manager oversees the BPP and leads a management staff of five Department Managers:

Operations Manager: Farming and Harvesting

Irrigation Manager: Irrigation

Resource Information Systems Manager: GIS, SCADA, computer admin.

Manufacturing Manager: Chip and saw log production

Marketing, Sales and Research Manager: Marketing, genetics and productivity research

Technicians and other clerical and office support report to the management group.

1.4.5 Monitoring System

Potlatch BPP uses a well-developed Environmental Management System (EMS). A full range of management activities and resource conditions are managed on the BPP including:

- Chemical pesticides and fertilizer use
- Energy usage
- Water use
- Forest inventory
- Utilization
- Wildlife inventory and monitoring
- Water quality
- Well monitoring

1.4.6 Estimate of Maximum Sustainable Yield

The sustainable yield on the BPP is regulated using area-control regulation. Once a balance age-class is achieved, approximately 1500 acres will be cleared and planted per year.

There are two primary models used for forest management. Potlatch's *Long-term Management Plan (2006)* describes two models that are used "the first is the growth and yield model, PC Pop, developed by Mason, Bruce & Girard. This model was developed using destructive sampling measures and detailed inventory information to develop growth curves for selected clones to use in predicting tree growth. The model then uses actual inventory data and grows the field (stand) of trees to the predicted harvest date."

1.4.7 Estimated, Current and Projected Production

Potlatch's *Long-term Management Plan (2006)* estimates "future production at 20-25 mbf of logs per acre for an annual log production of approximately 35-40 million board feet of logs. Given the consistent soil productivity and area based management there will be a consistent inventory and harvest level after 2010. The merchantable (5 years and older) inventory volume is consistently between 1.28 to 1.35 million green tons (GT), including both logs and chips. The annual harvest level will go from approximately 230,000 GT per year in 2006 to 320,000 GT by 2010. During this time period log volumes will increase with chip volumes declining slightly as trees grow and are merchandised to saw logs."

1.4.8 Chemical Pesticide Use

Potlatch's pesticide and rodenticide is approached using Integrated Pest Management (IPM). Cultural, biological, and genetic controls (e.g., cultivating soil to deter rodent habitat, providing nest and perch sites for predatory birds, using resistant clones) are effectively used by Potlatch to minimize the need for chemical pesticides. The following chemicals are used:

Chemical	Target and Method of Application
Dimilin*	Insecticide
Spinosad (Success)	Insecticide
Imidacloprid (Admire 2F)	Herbicide for competing vegetation in young plantations
2,4-D (Amine 4)*	Herbicide for competing vegetation in young plantations
Glyphosate	Herbicide for competing vegetation in young plantations
Clopyralid	Hand sprayed to control exotic Canadian Thistle

All pesticides used on the BPP were reviewed by the auditors as to whether or not they are prohibited by FSC. Dimilin and 2,4-D appear are included on the FSC highly hazardous list (prohibited); however, are currently permitted through existing derogations.

2.0 GUIDELINES/STANDARDS EMPLOYED

As the applicant forest property is located in Oregon, the certification evaluation that is the subject of this report was conducted against the duly-endorsed Pacific Coast (USA) Regional Forest Stewardship Standard (v9.0, 5/8/05). The standard is available at the FSC-US web site (www.fscus.org) or is available, upon request, from Scientific Certification Systems (www.scscertified.com).

3.0 THE CERTIFICATION ASSESSMENT PROCESS

3.1 Assessment Dates

The evaluation took place from June 13, 2006 through June 15, 2006.

3.2 Assessment Team

Dave Wager: Mr. Wager is Director of Forest Management Certification for SCS. During his 6 years as Director, Mr. Wager has overseen the day-to-day operations of the program and conducted Forest Management and Chain-of-Custody evaluations throughout the world. In his role as Program Director, Mr. Wager oversees all first-time certification evaluations, annual audits, and contract renewal certifications on approximately 70 active clients. 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 reduction in Utah's Central Wasatch Mountains.

Brendan Grady: Mr. 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. During his time with SCS, he has participated on over 10 audits throughout the Western United States.

3.3 Assessment Process

3.3.1 Itinerary

The forest management operation undergoing certification consists of a single Forest Management Unit with a single administrative office. The assessment consisted of office interviews with Potlatch staff and outside stakeholders, reviews of management plans and environmental management system documentation, field inspections of the management unit, and a tour of an offsite conservation area.

June 13, 2006 AM

SCS Participants: Dave Wager, Brendan Grady,

Potlatch Participants: (via phone)

Farm Office

Opening meeting

Topics covered:

- Plantation management
- Staff changes during the previous year
- Conversion to REIT
- Wildlife Monitoring Program
- Alternate revenue streams from the plantation

- Non-timber uses of the plantation
- Improvement of Columbia River intake pipe
- On-site processing and scrag mill
- Main harvesting contractor
- Water usage and improved water scheduling system
- Chemical pesticide applications
- Monitoring

Field 708

- Viewed grapple skidder and loader in action
- Discussed contractor oversight, harvesting practices
- Viewed compost being returned

June 13, 2006 PM

Field 810

- Viewed pruning crew in action
- Stakeholder consultation with contractor foreman

Central Processing Facility

- Toured on-site processing facility
- Wood chip and pallet stock production
- Discussed plans for future processing options

Research Plots

- Examined a variety of clonal trials, including nutrient and water use efficiency trials, pest and disease resistance trials, etc.

June 14, 2006 AM

The Nature Conservancy - Boardman Conservation Area

- Toured offsite native habitat conservation area
- Discussed grassland restoration and management
- Interviewed Nature Conservancy stakeholder

June 14, 2006 PM

Field 22

- Inspected pond in the management area
- Discussed Fish and Game cooperative wetland habitat creation effort
- Examined windthrow and pest attacks in neighboring stands

Field 803

- Viewed planting effort underway
- Discussed planting strategies and 1st year management of the stands

“Grassy Knoll”

- Lookout over the plantation property
- Discussed landscape level management of plantation area, trespassing concerns

Chemical Storage

- Inspected storage facilities for pesticides and fertilizers used on the plantation
- Discussed pesticide use on the farm

June 15, 2006

Farm Office

- Auditor Deliberations
- Closing Meetings

3.3.2 Stakeholder Consultation

Pursuant to SCS protocols, consultations with key stakeholders were a 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 Sample Company’s 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:

- Potlatch Corp employees, including headquarters and field
- contractors
- Members of the Pacific Coast FSC Working Group/National Initiative
- Regionally-based environmental organizations and conservationists
- Regionally-based social interest organizations
- Forest industry groups and organizations
- Local, State and Federal regulatory agency personnel
- Other relevant groups

Stakeholders were contacted with a notification mailing soliciting comment and/or phone contact. The list of stakeholders offering comments is maintained in the SCS files.

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

Social-economic Perspective

Comment/Concern	Response
<ul style="list-style-type: none"> Potlatch provides proper work directions and takes appropriate steps to ensure worker safety 	Noted
<ul style="list-style-type: none"> Potlatch is generally considered a good neighbor and easy to work with. 	Noted
<ul style="list-style-type: none"> In general, contractors enjoy working with Potlatch and compare them favorably to other employees in the region 	Noted
<ul style="list-style-type: none"> At times, it appears that there are too many different managers providing oversight and direction. 	Not necessary negative with respect to certification b/c it demonstrates Potlatch's strong oversight capacity

Environmental Perspective

Comment/Concern	Response
<ul style="list-style-type: none"> Potlatch has been proactive and very cooperative with NMFS. Potlatch could have been grandfathered in under prior regulations; however, they are being pro-active in upgrading to the best technology to prevent salmonid fry uptake. 	Noted
<ul style="list-style-type: none"> Potlatch uses the best available science with their irrigation system to maximize efficiency and precision, thus minimizing water usage 	Noted
<ul style="list-style-type: none"> BPP provides habitat for a diversity of wildlife species (e.g. small mammals, nesting birds, deer, and elk) 	Noted
<ul style="list-style-type: none"> Concern that the BPP may provide too much unnatural habitat for corvids, which prey on the nests of sensitive native steppe shrub wildlife (e.g., ground nesting birds, small mammals) in the adjacent bombing range. 	CAR 2006.1
<ul style="list-style-type: none"> Potlatch is making meaningful contributions to restoration of native grasslands at the TNC 	Noted

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3.4 Total Time Spent on audit

A total of eight auditor days were spent on the evaluation, including auditing documents and records, interviewing stakeholders, and carrying out field work. An additional 8 auditor days were spent preparing the certification report.

3.5 Process of Determining Conformance

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 ten 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 an 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 totality of the Criterion. For certification to be awarded, the importance-weighted average score for each of the 10 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.

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
P1: FSC Commitment and Legal Compliance	<ul style="list-style-type: none"> ▪ The Potlatch Corporation is strongly committed to the FSC, as evidenced by each of their resource management areas nation wide becoming certified. ▪ Potlatch has successfully maintained their certification over the past 5 years ▪ Potlatch has had no recent regulatory citations or violations 	<ul style="list-style-type: none"> ▪ No observed weaknesses 	<ul style="list-style-type: none"> ▪
P2: Tenure & Use Rights & Responsibilities	<ul style="list-style-type: none"> ▪ The land under evaluation is fully owned by Potlatch ▪ There are a few customary uses on the forest, such as hunting and horseback riding 	<ul style="list-style-type: none"> ▪ No observed weaknesses 	<ul style="list-style-type: none"> ▪
P3: Indigenous Peoples' Rights	<ul style="list-style-type: none"> ▪ Potlatch has contacted local tribes about a Columbia River project ▪ Potlatch does not manage tribal lands 	<ul style="list-style-type: none"> ▪ Interactions with local tribes are very limited 	<ul style="list-style-type: none"> ▪ REC 2006.1
P4: Community Relations & Workers' Rights	<ul style="list-style-type: none"> ▪ Potlatch maintains a Community Advisory Committee to address community concerns ▪ There is a very active safety program on the forest ▪ Interviews with employees and contractors revealed that job satisfaction is high ▪ Value added processing is done on site, creating more jobs through merchandizing; Potlatch will be likely creating upwards of 120 jobs through their future on-site processing facility 	<ul style="list-style-type: none"> ▪ No notable weaknesses 	<ul style="list-style-type: none"> ▪

from the Forest

scrag mill are in full operation on site. It is very likely that a sawmill of some sort will be built on site.

- Utilization of timber is excellent, and continues to improve. There is essentially zero wastage due to the chipping and composting operations.
- The local economy is mainly agricultural products (e.g., onions, potatoes, wheat), thus hybrid poplar adds considerable economic diversity.
- Production levels and optimal rotation length is based on intense monitoring of growth and yield plots, and clonal trials.

finds a variety of markets for its products, though poplar is the only commercial species that is grown.

- The plantation is a monoculture, which makes it more susceptible to large scale pest and pathogen disturbance.

<p>Environmental Impact</p>	<ul style="list-style-type: none"> ▪ with NMFS regulations for protecting salmonid fry. ▪ Potlatch continues to undertake numerous wildlife surveys (e.g., small mammals, herps, nesting birds, etc) on the BPP. ▪ Nest boxes and artificial ponds are used to create habitat within the site. ▪ Returning biomass to the soil through application of hog fuel, and more recently compost, has greatly increased the organic matter in the soil since the plantations have been established. ▪ Potlatch contributes to the management of a portion of TNC reserve, The Boardman Conservation Area. The amount of area that Potlatch is responsible for, ~1700 acres, is equivalent to 10% of the BPP. ▪ Potlatch has created wetlands by maintaining drainage ponds and restoring some native vegetation in these ponds. ▪ Potlatch has a track record of conforming with the FSC Chemical pesticide policy. ▪ Potlatch does not use genetic modification in breeding. 	<ul style="list-style-type: none"> ▪ green-up requirements utilized in planning harvest areas on the plantation. ▪ Understanding and mitigating impacts of plantation activities on biodiversity is an area with room for improvement. ▪ Consulting biologists have evaluated wildlife populations on the plantation, but their recommendations have not always been followed. ▪ Potlatch should review their wildlife monitoring results and scientific literature to determine if, and what type of, special management considerations should be put in place for wetlands. ▪ It is uncertain whether the hybrid stock is having any effect on native poplars in the region. 	<ul style="list-style-type: none"> ▪ Rec 2006.2 ▪ Rec 2006.3 ▪ Rec 2006.4
<p>P7: Management Plan</p>	<ul style="list-style-type: none"> ▪ An Environmental Management System is maintained by Potlatch, which identifies standard operating procedures and prescriptions for all management activities. ▪ Potlatch has an up-to-date management plan that covers most of the topics under FSC Criterion 7.1. ▪ Management plan is reviewed every 3 years and revised every 5 years. ▪ 	<ul style="list-style-type: none"> ▪ Publicly available information about the management of the Potlatch – Boardman plantation does not fully meet the requirements of the standard. A number of required elements are not referenced in the current management plan summary, including endangered species management, forest growth monitoring, maps, and efforts to conserve high conservation values (in this case the TNC reserve) 	<ul style="list-style-type: none"> ▪ CAR 2006.2

& Assessment	<p>forest health is excellent.</p> <ul style="list-style-type: none"> ▪ Frequency and intensity of monitoring is consistent with scale and intensity of operation, and risk. ▪ Growth, mortality, stocking, and effects of disturbances, are monitored through a replicable permanent inventory monitoring system. ▪ Potlatch actively monitors productivity and efficiency of forest management. ▪ There is a protocol for incorporating monitoring results as part of management plan revisions. ▪ Potlatch has a fauna monitoring program on the BPP. 	<p>monitoring the effects of their management on rare species.</p> <ul style="list-style-type: none"> ▪ Potlatch should develop a way to assess how their management decisions impact generation and/or maintenance of local jobs. ▪ There is no public summary of monitoring indicators. 	<ul style="list-style-type: none"> ▪ Rec 2006.6 ▪ CAR 2006.2
P9: Maintenance of High Conservation Value Forest	<ul style="list-style-type: none"> ▪ The Potlatch plantation was reviewed for HCVF prior to establishing a conservation arrangement with TNC at the Boardman Conservation Area. The review of the plantation indicated that there were no habitats worthy of HCVF designation. ▪ The Boardman Conservation Area was selected in collaboration with The Nature Conservancy and Potlatch's Citizen Advisory Committee. 	<ul style="list-style-type: none"> ▪ No weaknesses 	

Management	<p>at the Boardman Conservation Area.</p> <ul style="list-style-type: none">▪ The plantation is entirely on agricultural soil, so any wood produced from the area by definition reduces the need for wood from other forested areas in the region.▪ Potlatch has an active composting program, and soil quality has increased substantially since establishment of the plantation.▪ Genetic diversity exists throughout the plantation, with different clones selected for a variety of attributes, such as pest resistance.	<p>a population sink for some animal species in the region, see</p> <ul style="list-style-type: none">▪ There are some native poplars in the region and it is unknown whether the populations are mixing.	<ul style="list-style-type: none">▪ REC 2006.4.
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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 Potlatch 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 Potlatch be re-awarded FSC certification as a “Well-Managed Plantation” subject to the corrective action requests stated in Section 5.2. Potlatch has demonstrated that their system of management is capable of ensuring that all of the requirements of the Pacific Coast Regional Forest Stewardship Standard are met over the forest area covered by the scope of the evaluation. Potlatch 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

Background/Justification: The FSC standard requires forest managers to understand the environmental impacts of their operations and to put in place safeguards where needed. Wildlife studies on the Boardman plantation have shown the presence of wildlife that are either not normally found in the non-forested shrub-steppe areas of this region or are typical shrub-steppe species that inhabit the plantations. It appears forest as well as non-forest dwelling species are emigrating to the plantation. The fate of these species once they arrive in the plantations is not well understood. It is likely that some do very well, and the plantation acts a source for their populations, while others do not, and the plantation acts as a sink. The intent of this CAR is to direct Potlatch to assess the effects of the plantation on native fauna, and to implement safeguards where needed that will improve conditions for species (particularly sensitive ones) that may be at risk in the plantation.

CAR 2006.1	Potlatch must undertake efforts to improve their understanding of the impacts that their plantations have on native fauna, particularly state sensitive species S3. Where the plantation is shown to negatively impact native fauna, safeguards must be developed and implemented. Furthermore Potlatch must develop procedures for notifying the Oregon Natural Heritage program when rare species are found on the plantation.
Deadline	2007 surveillance audit
Reference	6.1.d; 6.2; 6.5.e.; 7.1.g; 8.2.c.1; 10.8.b

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Background/Justification: Publicly available information about the management of the Potlatch – Boardman plantation does not fully meet the requirements of the standard.	
CAR 2006.2	Potlatch must update their public summary to include all FSC required elements including endangered species management, forest growth monitoring, maps, efforts to conserve high conservation values (in this case the TNC reserve) and a summary of the results of monitoring indicators, reference to monitoring results (monitoring matrix). Information considered proprietary may be withheld from the summary. In addition, the Potlatch – Boardman website should be updated to include a reference to the existence of the public summary and means of obtaining it.
Deadline	2007 surveillance audit
Reference	7.4, and 8.5

Background/Justification: The likelihood of tribal cultural or archeological resources being present or intact on the plantation is very low, given that the land was previously in heavy cultivation. However, Potlatch has not taken the step of inviting local tribes to offer comment.	
REC 2006.1	Potlatch should contact the Historic Preservation Officer of the Umatilla Tribe to determine if there is any interest from the Tribe in cultural or archeological resources that may be found on the Potlatch plantation.
Reference	Criterion 3.2

Background/Justification: Currently no harvest adjacency or green-up requirements utilized in planning harvest areas on the plantation.	
REC 2006.2	Potlatch should research the costs and possible ecological benefits of establishing a green-up policy, and justify their decision whether or not to establish a green-up policy.
Reference	Criterion 10.2

Background/Justification: No natural waterbodies are found on the management area. There is an artificial duck pond, but management practices around the pond are not altered in consideration of the habitat.	
REC 2006.3	Potlatch should review their wildlife monitoring results and scientific literature to determine if, and what type of, special management considerations should be put in place for wetlands and aquatic habitats. Also see CAR 2006.1
Reference	Criterion 6.5

Background/Justification: The effects of the poplar breeding program on native <i>Populus</i> species are unknown.	
REC 2006.4	Potlatch should monitor native poplar recruitment in the area to determine if there is any hybridization with <i>Populus trichocarpa</i> .
Reference	Criterion 6.3

Background/Justification: There is no monitoring of management decision impacts on job creation.	
REC 2006.6	Potlatch should develop a way to assess how their management decisions impact generation and/or maintenance of local jobs.
Reference	Criterion 8.2

6.0 SURVEILLANCE EVALUATIONS

6.1 2007 Annual Audit

6.1.1 Background

Certificate Transfer from Potlatch Forest Holdings to GWR

The August 27-29, 2007 audit acted as the second phase assessment for transferring the certificate from Potlatch Forest Holdings to GWR. The first phase of the assessment occurred in April and May, prior to the May 15 date of official ownership change. Phase one included discussions with GWR staff and review of GWR's commitment to manage in accordance with the FSC Principles and Criteria. GWR made a commitment to retain nearly the entire staff (one operations position was consolidated) that had been managing the farm under Potlatch Forest Holdings. The discussions and written commitment provided SCS enough assurance to transfer the certificate to GWR on May 15, 2007, conditional upon demonstrating on-the-ground conformance during the August 27-29 assessment (Phase 2). Thus, the findings of this audit report constitute the on-site assessment for the ownership transfer.

Expansion of FMU to include additional 10,200 acres

Additionally, during the 2007 audit SCS assessed two nearby farms for inclusion into the scope of the existing FSC certificate. These farms are the Sand Lake Tree Farm (7000 acres) and the Sandpiper Tree Farm (3200 acres) that have been managed by GWR since 2005. Prior to GWR, these farms were managed by Boise Cascade.

About GWR

GreenWood Resources (GWR), Inc, based in Portland, Oregon, is a proven, international leader in the development and management of sustainable, short rotation tree farms and manages over 30,000 acres of poplar in the Pacific Northwest. GWR specializes in technologically advanced hardwood tree farm management in North America, South America and China. To support this business, GWR maintains a

world-class tree improvement and nursery business providing superior plant material for tree farms under management. (www.greenwoodresources.com).

6.1.2 Assessment Dates

Dave Wager conducted the annual audit of GWR from August 27-29. The audit included on-site inspections of field operations as well as extensive interviews with GWR staff and outside stakeholders.

6.1.3 Assessment Personnel

Dave Wager

Mr. Wager is Director of Forest Management Certification for SCS. During his 7 years as Director, Mr. Wager has overseen the day-to-day operations of the program and conducted Forest Management and Chain-of-Custody evaluations throughout the world. Recent evaluations conducted by Mr. Wager include Minnesota DNR, Wisconsin County Forests, State of PA Bureau of Forestry, State of Massachusetts, Perak ITC- Malaysia, and Collins Pine Lakeview and Almanor Forests. In his role as Program Director, Mr. Wager oversees all first-time certification evaluations, annual audits, and contract renewal certifications on approximately 60 active clients. 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.

6.1.4 Assessment Process

The following general steps were undertaken as part of the 2007 audit:

- Review of 2005 and 2006 certification reports
- Review of management plans for Boardman Tree Farm and Sandpiper Tree Farm
- Completion of the field audit
- Synthesis of findings, and judging performance relative to the FSC Pacific Coast Standard
- Presentation of results
- Preparation of the written certification evaluation report, and the public summary

The field portion of the audit included a broad array of field sites designed to illustrate a cross-section of hybrid poplar management activities. During the field audit, the SCS auditors engaged in personal interviews with GWR staff, contractors, and outside stakeholders.

Monday August 27, 2007

Office Discussions (10 a.m. -1 p.m.)

(GWR Participants: Hunter Brown, Don Rice, Mike Berk, Jake Eaton, Donna Townsend, Luke Maynard, Corey Boswell, Andrew Bourque)

Topics covered:

- Overview of GWR Organization
- Partnership with Collins Pine Company to build sawmill on-site
- Overview of Sand Lake and Sandpiper farms
- Staff changes related to Boardman operations
- Changes in operating procedures at Boardman
- Review of open CARs and Recommendations
- Discussion of field sites to visit during audit
- Activities on Boardman Conservation Area (partnership with The Nature Conservancy)

Field Review and Discussions (1:00 -5:30 p.m.)

Sand Lake Farm

- 7-year old stand- comparison of thin versus non-thinned
- Cottonwood Leaf Beetle treatment with systemic imidacloprid
- Tractor based herbicide application with ~5% precision
- Deer browsed plantings
- Row thinning in block 685
- Experimental goat treatment to control competing vegetation
- Mulcher for treatment of post harvest debris
- Safety issues around chlorine gas treatment for irrigation system
- Trial site using only mechanical weeding
- Chemical storage facility- review inventory and storage
- Interview labor crew supervisor Augustine Fonseca
- Road maintenance- gravel application and dust control

Research Plots

- Alder trials
- Various clonal trials, and water use trials

Tuesday August 28, 2007

Sandpiper Farm

- Review of planning documents
- Review of pesticide application records
- Discussion regarding irrigation pump intake screens on Columbia (inspected annually, and reported to National Marine Fisheries Council)
- 2nd Pruning Field 113
- Biological control techniques with hawk perches
- Interview and safety inspection of pruning crew foreman (MSDS, first aid kit, response #'s)
- Washington State University entomology researchers- discussions on a wide-range of topics
- Creek crossings and adjacent stand management Glade Cree, Patterson Creek
- Inventory system- to be upgraded to that used on Boardman farm
- Possibility for hybridization of native poplar

Boardman Tree Farm

- Interview with pesticide lead contractor (Earl Perkins) covering IPM, notification, safety, spill procedures etc.
- Interview with chemical applicator Raymond Esquivel (confirmed license, safety, emergency response, etc)
- Field trial of fully organic (non synthetic) nutrient and micronutrient treatment

Wednesday August 29, 2007

- Habitat ponds on bombing range road
- Interview with primary logging contractor (Marty Britt)
- Oldest age fields (Rising 10 and Rising 12)
- Active felling operations
- Exit briefing

6.1.5 Status of Corrective Action Requests Open at Start of 2007 Audit

CAR 2006.1	Reference: 6.1.d; 6.2; 6.5.e.; 7.1.g; 8.2.c.1; 10.8.b
Potlatch must undertake efforts to improve their understanding of the impacts that their plantations have on native fauna, particularly state sensitive species S3. Where the plantation is shown to negatively impact native fauna, safeguards must be developed and implemented. Furthermore Potlatch must develop procedures for notifying the Oregon Natural Heritage program when rare species are found on the plantation.	
Action Taken By Company/Auditor Comments	
<p>GWR Actions: Three main actions are underway to address this CAR.</p> <ol style="list-style-type: none"> 1. GWR added a section to its management plan that lists special status species occurring in the steppe shrub areas of eastern Oregon and Washington. 2. GWR contractors received a first training on the identification of S3 species that could occur on the tree farm including long billed curlew, western burrowing owl, and Ferruginous hawk. Additionally, a training guide was prepared. 3. GWR updated the The Wildlife Stewardship Plan that had been in place under Potlatch management. Of most relevance to this CAR, wildlife monitoring protocols will continue with diurnal and nocturnal raptor surveys (5-year interval); owl nest boxes (annually); small mammals (5-years); breeding bird surveys (5 years); deer and elk (periodic). Notably amphibians are missing from the wildlife survey schedule, and this should be corrected. <p>SCS Findings: Some progress has been made toward implementing safeguards for special status species. Additionally, the commitment to continue wildlife monitoring will help assess the impact of the plantation on native fauna. Contractor training will need to be repeated and over time expanded to include all of the S1-S3 species that have a reasonable likelihood of occurring on the plantation. The Wildlife monitoring efforts will need to transition from inventory/presence absence work to an assessment of how well native wildlife survive/reproduce in this unnatural plantation environment. Additionally, these efforts will need to be expanded to the Sand Lake</p>	

and Sandpiper tree farms. SCS will close the existing CAR and issue a new CAR that requests continued progress on existing achievements and new actions on those items still needing to be accomplished.

Position in the end of this audit: Closed; See CAR 2007.1

CAR 2006.2	Reference: 7.4, 8.4
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Potlatch must update their public summary to include all FSC required elements including endangered species management, forest growth monitoring, maps, efforts to conserve high conservation values (in this case the TNC reserve) and a summary of the results of monitoring indicators, reference to monitoring results (monitoring matrix). Information considered proprietary may be withheld from the summary.

In addition, the Potlatch – Boardman website should be updated to include a reference to the existence of the public summary and means of obtaining it.

Action Taken By Company/Auditor Comments

GWR Actions: A revised public summary, dated August 2007, was provided to SCS.

SCS Findings: The revised public summary of the management plan now covers all required elements of the FSC standard. However, GWR is still missing a public summary of monitoring indicators and results. Thus, either the public summary of the management plan needs to be expanded or a separate public summary of monitoring results must be produced. Finally, the summary is not available from the FSC website, nor is there any mention of it being available. Because partial progress has been made, SCS will close this CAR and issue a new CAR with the remaining actions.

Position in the end of this audit: Closed; see CAR 2007.1

Recommendations

REC 2006.1	Potlatch should contact the Historic Preservation Officer of the Umatilla Tribe to determine if there is any interest from the Tribe in cultural or archeological resources that may be found on the Potlatch plantation.
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Reference	Criterion 3.2
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SCS Findings: GWR has made contact with the Umatilla Tribe, and there are no known sites or any interest in working with GWR on these issues. Recommendation has been addressed.

REC 2006.2	Potlatch should research the costs and possible ecological benefits of establishing a green-up policy, and justify their decision whether or not to establish a green-up policy.
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Reference	Criterion 10.2
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GWR has completed an assessment and concluded that because of quick replanting and rapid growth of poplar that they are able to meet the height green-up requirement in the Oregon forest practices. This Recommendation has been addressed.

Background/Justification: No natural waterbodies are found on the management area. There is an artificial duck pond, but management practices around the pond are not altered in consideration of the habitat.	
REC 2006.3	Potlatch should review their wildlife monitoring results and scientific literature to determine if, and what type of, special management considerations should be put in place for wetlands and aquatic habitats. Also see CAR 2006.1
Reference	Criterion 6.5
SCS Findings: With the expanded scope of the certificate, natural water resources now occur with the managed plantation. No action has been taken on this recommendation and it is elevated to CAR 2007.4	

Background/Justification: The effects of the poplar breeding program on native <i>Populus</i> species are unknown.	
REC 2006.4	Potlatch should monitor native poplar recruitment in the area to determine if there is any hybridization with <i>Populus trichocarpa</i> .
Reference	Criterion 6.3
SCS Findings: Because of the native <i>Populus trichocarpa</i> habitat on the Sandpiper farm this issue becomes more of a concern. CAR 2007.7 Is issued.	

Background/Justification: There is no monitoring of management decision impacts on job creation.	
REC 2006.6	Potlatch should develop a way to assess how their management decisions impact generation and/or maintenance of local jobs.
Reference	Criterion 8.2
SCS Findings: Although no monitoring has occurred, with the building of the on-site sawmill, GWR is moving in the direction of very positive effects on local jobs. The new mill will employ approximately 150 people. The recommendation remains applicable, especially now, that resource management will have a heightened and more direct impact on jobs.	

6.1.6 General Observations

The 2007 audit revealed that the GWR poplar plantation continues to be managed in overall conformance with the FSC Pacific Coast Standard. The change in ownership from Potlatch to GWR has not resulted in any new non-conformances. Nearly the entire management team from Potlatch was retained by GWR. The only notable gap in staff resources is the loss of access to Potlatch's regional wildlife biologist, who had been spending a limited amount of time on the hybrid poplar plantation. GWR plans to compensate for this loss through the use of consulting biologists. Whether or not GWR has retained a sufficient level of expertise in wildlife and ecology will be a focus during future surveillance audits.

There have been no major changes in management objectives or operating procedures. GWR is a world leader at deploying state-of-the-art infrastructure and management systems for growing hybrid poplar. GWR continues to improve various social, environmental, and economic aspects of their tree farms.

Several new corrective action requests (see section 2.6) were issued for non-conformances observed during the 2007 audit.

6.1.7 New Corrective Action Requests and Recommendations

<p>Background/Justification: See CAR 2006.1, which has only been partially completed (Section 2.4). Additionally, wildlife monitoring needs to be expanded to the Sand Lake and Sandpiper farms.</p> <p>The FSC standard requires forest managers to understand the environmental impacts of their operations and to put in place safeguards where needed. Wildlife studies on the Boardman plantation have shown the presence of wildlife that are either not normally found in the non-forested shrub-steppe areas of this region or are typical shrub-steppe species that inhabit the plantations. It appears forest as well as non-forest dwelling species are emigrating to the plantation. The fate of these species once they arrive in the plantations is not well understood. Additionally, there is no information regarding the impacts that fauna inhabiting the plantation are having on native steppe shrub habitat within and adjacent to the plantations. For example, there appear to be high populations of corvids along Bombing Range Road that might be preying on native ground nesting birds and small mammals on the bombing range.</p> <p>It is likely that some species do very well with the poplar plantation, and the plantation acts a source for their populations, while others do not, and the plantation acts as a sink. The intent of this CAR is to direct GWR to shift/expand their wildlife monitoring and research to assess effects of the plantation on native fauna populations.</p>	
<p>CAR 2007.1</p>	<p>GWR must expand their wildlife monitoring/research and safeguard measures for protecting native fauna. By the 2008 surveillance audit, GWR must update their wildlife stewardship plan (and other relevant documents/procedures) to demonstrate how:</p> <ul style="list-style-type: none"> • GWR has begun expanding wildlife monitoring and survey work to cover the newly added farms (Sand Lake and Sandpiper); • GWR has begun shifting/expanding monitoring and research work to more actively assess the effects of the poplar plantation on native fauna; • Training of contractors will be expanded to include all S1-S3 species that may occur within the managed plantation.
<p>Deadline</p>	<p>2008 audit</p>
<p>Reference</p>	<p>FSC Indicators 6.1.d; 6.2; 6.5.e.; 7.1.g; 8.2.c.1; 10.8.b</p>

Background/Justification: See CAR 2007.2, which was only partially addressed. The GWR public summary is not readily available, and there is no public summary of monitoring

results.	
CAR 2007.2	GWR must make reference to the availability of or post the public summary of the management plan onto the GWR website. Additionally, GWR must prepare and make available a public summary of monitoring results.
Deadline	2008 audit
Reference	FSC Indicator 8.5

Background/Justification: The GWR Community Advisory Committee does not include stakeholders who are specifically relevant to the Sand Lake and Sandpiper farms.	
CAR 2007.3	GWR must expand their CAC to include stakeholders relevant to the Sand Lake and Sandpiper farms.
Deadline	2008 audit
Reference	FSC Criterion 4.4.

Background/Justification: GWR lacks specific guidelines and an overall approach for watercourse management. With the addition of the Sandpiper farm, which has natural watercourses, there is a need to assess and mitigate management impacts to watercourses.	
CAR 2007.4	GWR must develop and implement a plan for management of water resources on its tree farms. The strategy must include: <ul style="list-style-type: none"> • An assessment of the environmental impacts of the hybrid poplar plantation on water resources, particularly related to the Sandpiper farm, where there are natural watercourses; • Written guidelines and/or operation procedures for watercourse management; • Timeline and action plan on restoration activities deemed necessary in watercourse areas.
Deadline	2008 audit
Reference	FSC Criterion 6.5

Background/Justification: 10.5.d. In plantations on agricultural soils, at least 10% of the plantation area is restored to the ecosystem native to the site. For the former Potlatch lands, GWR has met this requirement through an off-site conservation agreement with The Nature Conservancy. In total, GWR has more than 3400 acres of uncultivated land. GWR needs an additional (1084 acres) of native ecosystem to meet the 10% requirement. It is unclear if there are 1084 acres of the uncultivated area that are of sufficient quality to qualify as native ecosystem. GWR needs a working definition of native ecosystem in order to answer this question.	
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CAR 2007.5	In order to demonstrate conformance with Indicator 10.5.d., GWR must: <ol style="list-style-type: none"> 1. Define what constitutes “native ecosystem” within their ownership (note: GWR should consult shrub-steppe ecologists/biologists in developing this definition); 2. Survey the uncultivated areas to determine the number of acres qualifying as native ecosystem- as defined in step 1. 3. If less than 10% of the estate is in native ecosystem, then GWR must develop and begin implementation of an action plan to restore the additional necessary acres to native shrub-steppe habitat.
Deadline	2008 audit
Reference	FSC Indicator 10.5.d

Background/Justification: Integrated pest management strategies are not being utilized to the fullest extent across GWR acreages. Improvements in weed control and more nest boxes for biological control are necessary to demonstrate full conformance with Criterion 10.7. <i>“Integrated pest management shall form an essential part of the management plan, with primary reliance on prevention and biological control methods rather than chemical pesticides and fertilizers. Plantation management should make every effort to move away from chemical pesticides and fertilizers, including their use in nurseries. The use of chemicals is also covered in Criteria 6.6 and 6.7.”</i>	
CAR 2007.6	GWR must take additional actions to demonstrate that there is full use of integrated pest management across the ownership, especially related to vole population control.
Deadline	2008 audit
Reference	FSC Criterion 10.7

Background/Justification: GWR cannot currently demonstrate that its plantations are in conformance with Indicator 10.8.b. <i>On former agricultural lands, the use of exotic plant species (see Glossary) is contingent on credible scientific analysis (see Glossary) that the species is non-invasive and does not diminish off-site native biodiversity.</i> The risk of hybridization is now of more concern because the newly added Sandpiper farm may have native <i>Populous trichocarpa</i> along its watercourses, and because of its proximity to the Columbia river.	
CAR 2007.7	Implement a monitoring approach to assess if exotic hybrid poplars are hybridizing with native <i>Populus trichocarpa</i> .
Deadline	2008 audit
Reference	FSC Indicator 10.8.b

Recommendations:

Background/Justification: Although GWR is currently exempted from the majority of
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retention requirement of Pacific Coast Standard, this is subject to change as a result of the Plantation Review and/or revision to the FSC US standards. Retention of stand-level habitat elements would benefit native forest dwelling species that have emigrated to these tree farms.	
REC 2007.1	GWR should modify harvest and site preparation prescriptions to ensure that some level of stand level habit elements including live trees, den trees, snags, and coarse woody debris are retained during regeneration harvests.
Reference	Criterion 6.3

6.1.8 General Conclusions of the Annual Audit

Based upon information gathered through site visits, interviews, and document review, the SCS audit team concludes that GWR’s management of the Boardman poplar plantation continues to be in strong overall conformance with the FSC Pacific Coast Standard. Additionally, management of the Sand Lake and Sandpiper farm is in overall conformance with the FSC Pacific Conformance Standard. 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 assessment that GWR’s forest management program is in general conformance with FSC Principles 1 through 10. As such, continuation of the certification is warranted, subject to subsequent annual audits.

6.2 2008 ANNUAL AUDIT

6.2.1 Assessment Dates

Dave Wager conducted the annual audit of GWR from August 26-28. The audit included on-site inspections of field operations as well as extensive interviews with GWR staff and outside stakeholders.

6.2.2 Assessment Personnel

Dave Wager

Mr. Wager is Director of Forest Management Certification for SCS. During his 7 years as Director, Mr. Wager has overseen the day-to-day operations of the program and conducted Forest Management and Chain-of-Custody evaluations throughout the world. Recent evaluations conducted by Mr. Wager include Minnesota DNR, Wisconsin County Forests, State of PA Bureau of Forestry, State of Massachusetts, Perak ITC- Malaysia, and Collins Pine Lakeview and Almanor Forests. In his role as Program Director, Mr. Wager oversees all first-time certification evaluations, annual audits, and contract renewal certifications on approximately 60 active clients. 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.

6.2.3 Assessment Process

The following general steps were undertaken as part of the 2007 audit:

- Consultation with FSC US about the plantations on agricultural, forest, and non-forest soils
- Review of 2005-2007 certification reports
- Review of management plans for Boardman, Sandpiper, and Lower Columbia Tree Farms
- Completion of the field audit
- Synthesis of findings, and judging performance relative to the FSC Pacific Coast Standard
- Preparation of the written certification evaluation report, and the public summary

The field portion of the audit included a broad array of field sites designed to illustrate a cross-section of hybrid poplar management activities. During the field audit, the SCS auditors engaged in personal interviews with GWR staff and outside stakeholders.

Tuesday August 26, 2008

Boardman Tree Farm

Office Discussions (10 a.m. -1 p.m.)

(GWR Participants: Don Rice (via phone), Mike Berk, Jake Eaton, Donna Townsend, Luke Maynard, Cory Boswell, Andrew Bourque, and Bruce Summers)

Topics covered:

- Overview of New Developments at GWR
- Launched \$200 million investment fund for projects in China- committed to bring all new projects under, FSC eligibility requirement withstanding.
- Launching a 2nd fund for North America
- Growth in staff with accountants and analysts
- Expanding partnerships with researchers and plantation managers worldwide
- GreenWood Resources Operations within FSC Scope
- Updates to GreenWood Management System- SOP's and Work Instructions
- Discussions with Board of Forestry to allow rotation to exceed 12 year agricultural cap
- Revision of Farm Driving Policy
- Illegal activities- dumping, theft and cooperation with local authorities to improve control
- Community Advisory Committee- expansion to include new stakeholders with relevance to Sandpiper and Sand Lake farms
- Pursuit of wind energy development- contract with First Wind
- Other non-solid wood developments—pellets, hog fuel for cellulosic ethanol – MOU with ZeaChem Inc. to supply a pilot cellulosic ethanol plant to be built at the Port of Morrow.
- Fertilizer treatments—reduced nitrogen application
- Integrated Pest Management through Washington State University Partnership

- Status of on-site sawmill- with Collins Pine
- Activities on Sandpiper farms
- Staff changes- several contractors brought on as permanent staff
- Review of open CARs and Recommendations
- Discussion of field sites to visit during audit

Field Review and Discussions (1:00 -5:30 p.m.)

Sand Lake and Boardman Farm

- Field 5031—Harvest heavy windthrow damage following row thinning
- Mulcher post harvest clean-up- removes coarse woody debris
- Field 6079- Tractor based herbicide application with ~5% precision
- Field 6141- New planting - deer browse
- Field 6171—windthrow damage following thinning- scheduled for harvest
- Met tower- for wind turbine research
- Washington State University entomology researchers- discussions on a wide-range of topics
 - treatment with systemic rynaxapyr versus imidacloprid
- Firewood collection to assist with site preparation

Wednesday August 27, 2007

Closing Discussions Boardman and Travel to Lower Columbia Farm Sandpiper Farm

Lower Columbia Farm, Clatskanie, Oregon

- Background information on Lower Columbia Farm
 - Discussion of Pre-dyke condition- mud flats, sedge, wetland, riparian forest
 - Past land uses pre and post dyke
 - Socio-economic profile of area
 - Conservation interests for the region
- Review of pesticide application records
- Review of maps and aerial photographs of Lower Columbia Farm
- Tour of Beaver Drainage District
 - Goat vegetation control
 - Pesticide storage facility
 - Raptor perch sites and nest platforms
 - Pruning 3-year old
 - Wallace island vegetation
 - Levy vegetation control
 - Discussion on community involvement

Thursday August 28, 2008

Westport Tree Improvement Center - Research Facility

- GMO Policy
- Clone trials

- Cultivar traits and Role of breeding in Integrated Pest Management
- Nursery
- Possibility for hybridization of native poplar
- Westport Drainage District
- Bradley State Park Overlook of Lower Columbia River, Puget Island, and Farms
- Harvest and related activities in Midland Drainage District
- Louisiana Swamp and other areas of semi natural vegetation
- Whole tree chipping operation

6.2.4 Status of Corrective Action Requests Open at Start of 2007 Audit

Background/Justification: See CAR 2006.1, which has only been partially completed (Section 2.4). Additionally, wildlife monitoring needs to be expanded to the Sand Lake and Sandpiper farms.

The FSC standard requires forest managers to understand the environmental impacts of their operations and to put in place safeguards where needed. Wildlife studies on the Boardman plantation have shown the presence of wildlife that are either not normally found in the non-forested shrub-steppe areas of this region or are typical shrub-steppe species that inhabit the plantations. It appears forest as well as non-forest dwelling species are emigrating to the plantation. The fate of these species once they arrive in the plantations is not well understood. Additionally, there is no information regarding the impacts that fauna inhabiting the plantation are having on native steppe shrub habitat within and adjacent to the plantations. For example, there appear to be high populations of corvids along Bombing Range Road that might be preying on native ground nesting birds and small mammals on the bombing range. It is likely that some species do very well with the poplar plantation, and the plantation acts a source for their populations, while others do not, and the plantation acts as a sink. The intent of this CAR is to direct GWR to shift/expand their wildlife monitoring and research to assess effects of the plantation on native fauna populations.

CAR 2007.1	<p>GWR must expand their wildlife monitoring/research and safeguard measures for protecting native fauna. By the 2008 surveillance audit, GWR must update their wildlife stewardship plan (and other relevant documents/procedures) to demonstrate how:</p> <ul style="list-style-type: none"> ● GWR has begun expanding wildlife monitoring and survey work to cover the newly added farms (Sand Lake and Sandpiper); ● GWR has begun shifting/expanding monitoring and research work to more actively assess the effects of the poplar plantation on native fauna; ● Training of contractors will be expanded to include all S1-S3 species that may occur within the managed plantation.
Deadline	2008 audit
Reference	FSC Indicators 6.1.d; 6.2; 6.5.e.; 7.1.g; 8.2.c.1; 10.8.b

Action Taken By Certificate holder/Auditor Comments (2008)	
<p>GWR Response:</p> <ol style="list-style-type: none"> 1. Engaged Northwest Wildlife Consultants to update the Wildlife Stewardship Plan and propose a schedule for conducting surveys. 2. Trained contractors in S1-S3 species and implemented a procedure to address when these species are encountered in the 2007 Management Plans. 3. Incorporated the LCTF plan initiatives and a strategy to enhance the plan in the LCTF Management Plan. <p>SCS Findings: SCS confirmed that the above actions occurred. The training on S1-S3 species could be enhanced through a discussion of habitat requirements. SCS will continue to review the implementation, continuous improvement, and results of these actions.</p>	
Status August 2008: Closed	

Background/Justification: See CAR 2007.2, which was only partially addressed. The GWR public summary is not readily available, and there is no public summary of monitoring results.	
CAR 2007.2	GWR must make reference to the availability of or post the public summary of the management plan onto the GWR website. Additionally, GWR must prepare and make available a public summary of monitoring results.
Deadline	2008 audit
Reference	FSC Indicator 8.5
Action Taken By Certificate holder/Auditor Comments (2008)	
<p>GWR Response:</p> <ol style="list-style-type: none"> 1. Post public summaries and other pertinent documents – Done Q3, 2007 2. Post research results summary – Done Q3, 2008 <p>SCS Findings: SCS confirmed that the public summary and pertinent documents were available on the GWR website. A summary of research results was completed that can be made available, however, these do not cover the items listed in Criterion 8.2. Since the majority of the CAR was met (and to-date there has been no request for a public summary of monitoring results)- this will be closed and a new CAR will be issued to complete the public summary by the 2009 audit.</p>	
Status August 2008: Closed; issued CAR 2008.8	

Background/Justification: The GWR Community Advisory Committee does not include stakeholders who are specifically relevant to the Sand Lake and Sandpiper farms.

CAR 2007.3	GWR must expand their CAC to include stakeholders relevant to the Sand Lake and Sandpiper farms.
Deadline	2008 audit
Reference	FSC Criterion 4.4.
Action Taken By Certificate holder/Auditor Comments (2008)	
<p>GWR Response:</p> <ol style="list-style-type: none"> 1. Expand CAC to Sandpiper and Sand Lake stakeholders – Done Q4, 2007. 2. Implemented a social luncheon/open house for the BTF and STF neighbors – Initiated Q3, 2007. <p>SCS Findings: SCS verified that the above actions took place.</p>	
Status August 2008: Closed	

Background/Justification: GWR lacks specific guidelines and an overall approach for watercourse management. With the addition of the Sandpiper farm, which has natural watercourses, there is a need to assess and mitigate management impacts to watercourses.	
CAR 2007.4	<p>GWR must develop and implement a plan for management of water resources on its tree farms. The strategy must include:</p> <ul style="list-style-type: none"> • An assessment of the environmental impacts of the hybrid poplar plantation on water resources, particularly related to the Sandpiper farm, where there are natural watercourses; • Written guidelines and/or operation procedures for watercourse management; • Timeline and action plan on restoration activities deemed necessary in watercourse areas.
Deadline	2008 audit
Reference	FSC Criterion 6.5
Action Taken By Certificate holder/Auditor Comments (2008)	
<p>GWR Response:</p> <ol style="list-style-type: none"> 1. Reports by Cees van Oosten on Sandpiper water resources. 2. GWR policy for management around water courses developed and included in the 2008 FSC management plan. 3. Report by Northwest Wildlife Consultants on the habitat typing on the STF and a plan for restoring the creek side areas on the STF. See Appendix D. <p>SCS Findings: SCS verified that the items listed in the GWR response were completed. At the time of the audit, procedures for watercourse management zones were not in place. On Sept 17, draft guidelines were provided to SCS. The SOP's adequately address watercourse management on the Sandpiper, Boardman, and Lower Columbia tree farms</p>	

Status August 2008: Closed

Background/Justification: 10.5.d. In plantations on agricultural soils, at least 10% of the plantation area is restored to the ecosystem native to the site. For the former Potlatch lands, GWR has met this requirement through an off-site conservation agreement with The Nature Conservancy. In total, GWR has more than 3400 acres of uncultivated land. GWR needs an additional (1084 acres) of native ecosystem to meet the 10% requirement. It is unclear if there are 1084 acres of the uncultivated area that are of sufficient quality to qualify as native ecosystem. GWR needs a working definition of native ecosystem in order to answer this question.

CAR 2007.5	<p>In order to demonstrate conformance with Indicator 10.5.d., GWR must:</p> <ol style="list-style-type: none"> 4. Define what constitutes “native ecosystem” within their ownership (note: GWR should consult shrub-steppe ecologists/biologists in developing this definition); 5. Survey the uncultivated areas to determine the number of acres qualifying as native ecosystem- as defined in step 1. 6. If less than 10% of the estate is in native ecosystem, then GWR must develop and begin implementation of an action plan to restore the additional necessary acres to native shrub-steppe habitat.
Deadline	2008 audit
Reference	FSC Indicator 10.5.d

Action Taken By Certificate holder/Auditor Comments (2008)

GWR Response:

1. Northwest Wildlife Consultants report identifying and prioritizing areas forest restoration. See Appendix D.
2. Action plan to begin implementation of the restoration plan included in 2008 FSC Management Plan update.

SCS Findings: SCS verified that the assessment work occurred and a list of priority areas has been created. SCS will continue to assess the implementation of this plan.

Status August 2008: Closed

Background/Justification: Integrated pest management strategies are not being utilized to the fullest extent across GWR acreages. Improvements in weed control and more nest boxes for biological control are necessary to demonstrate full conformance with Criterion 10.7. *“Integrated pest management shall form an essential part of the management plan, with primary reliance on prevention and biological control methods rather than chemical pesticides and fertilizers. Plantation management should make every effort to move away from chemical pesticides and fertilizers, including their use in nurseries. The use of chemicals is also covered in Criteria 6.6 and 6.7.”*

CAR 2007.6	GWR must take additional actions to demonstrate that there is full use of integrated pest management across the ownership, especially related to vole population control.
Deadline	2008 audit
Reference	FSC Criterion 10.7
Action Taken By Certificate holder/Auditor Comments (2008)	
<p>GWR Response:</p> <ol style="list-style-type: none"> 1. Added nest boxes and perches to tree farms 2. Invested heavily to improve weed control on BTF and STF. 3. Cees van Oosten visited all tree farms and addressed the vole issue in his report on Integrated Pest Management Strategies. See Appendix E. <p>SCS Findings: SCS verified the above actions occurred.</p>	
Status August 2008: Closed	

<p>Background/Justification: GWR cannot currently demonstrate that it's plantations are in conformance with Indicator 10.8.b. <i>On former agricultural lands, the use of exotic plant species (see Glossary) is contingent on credible scientific analysis (see Glossary) that the species is non-invasive and does not diminish off-site native biodiversity.</i></p> <p>The risk of hybridization is now of more concern because the newly added Sandpiper farm may have native <i>Populous trichocarpa</i> along its watercourses, and because of its proximity to the Columbia river.</p>	
CAR 2007.7	Implement a monitoring approach to assess if exotic hybrid poplars are hybridizing with native <i>Populus trichocarpa</i> .
Deadline	2008 audit
Reference	FSC Indicator 10.8.b
Action Taken By Certificate holder/Auditor Comments (2008)	
<p>GWR Response:</p> <ol style="list-style-type: none"> 1. Engaged Cees van Oosten to analyze this issue. Findings reported in Sandpiper Farm – Exotic Poplars Appendix C. 2. Recommendations incorporated into the STF Management Plan. <p>SCS Findings: The risk of hybridization occurring or hybrids colonizing native areas is extremely low. GWR will continue to monitor for this problem. Because the scope of the certificate has been expanded to include the Lower Columbia Farm, GWR will need to complete a similar type of assessment and monitoring program there as well. See CAR 2008.2</p>	
Status August 2008: Closed; See CAR 2008.2	

Recommendations:

Background/Justification: Although GWR is currently exempted from the majority of retention requirement of Pacific Coast Standard, this is subject to change as a result of the Plantation Review and/or revision to the FSC US standards. Retention of stand-level habitat elements would benefit native forest dwelling species that have emigrated to these tree farms.	
REC 2007.1	GWR should modify harvest and site preparation prescriptions to ensure that some level of stand level habit elements including live trees, den trees, snags, and coarse woody debris are retained during regeneration harvests.
Reference	Criterion 6.3
GWR Response: No action taken on this Recommendation	
Status August 2008: Continued	

Background/Justification: There is no monitoring of management decision impacts on job creation.	
REC 2006.6	Potlatch should develop a way to assess how their management decisions impact generation and/or maintenance of local jobs.
Reference	Criterion 8.2
SCS Findings: Although no monitoring has occurred, with the building of the on-site sawmill, GWR is moving in the direction of very positive effects on local jobs. The new mill will employ approximately 150 people. The recommendation remains applicable, especially now, that resource management will have a heightened and more direct impact on jobs. 2008 Update: Recommendation remains open. Once the mill is up and running, GWR should take a more active approach to determining the impacts of management on job creation.	

6.2.5 General Observations

The 2008 audit revealed that the GWR poplar plantations continue to be managed in overall conformance with the FSC Pacific Coast Standard.

Several new corrective action requests (see section 2.6) were issued for non-conformances observed during the 2007 audit.

6.2.6 New Corrective Action Requests and Recommendations

Background/Justification: Projects with the potential to cause impact (note: impacts can be positive or negative) in the environment and/or in the local community are occurring in the absence of a project/site level environmental impact assessment. The noted example during the 2008 audit was the introduction of 1800 goats for vegetation control.	
CAR 2008.1	GWR must develop a program to undertake site/project level impact assessments to evaluate and mitigate the social and environmental impacts of the management activities.
Reference	Indicator: 6.1.c
Deadline	2009 surveillance audit

Background/Justification: GWR cannot currently demonstrate that its Lower Columbia farm is in conformance with Indicator 10.8.b. <i>On former agricultural lands, the use of exotic plant species (see Glossary) is contingent on credible scientific analysis (see Glossary) that the species is non-invasive and does not diminish off-site native biodiversity.</i> Hybrid poplar may be crossing with the native <i>Populous trichocarpa</i> , and or establishing itself outside of the plantation.	
CAR 2008.2	Implement a monitoring approach to assess if exotic hybrid poplars are hybridizing with native <i>Populus trichocarpa</i> and/or establishing off-site on the LCTF.
Deadline	2009 surveillance audit
Reference	FSC Indicator 10.8.b

Background/Justification: 10.5.d. In plantations on agricultural soils, at least 10% of the plantation area is restored to the ecosystem native to the site. GWR has not demonstrated how this requirement will be met on the LCTF.	
CAR 2008.3	GWR must present and begin implementation of a timeline, action plan, and allocation of funding for restoring 10% of the plantation to “ecosystem native to the site”.
Deadline	2009 audit
Reference	FSC Indicator 10.5.d

Background/Justification: GWR has not expanded their wildlife monitoring/research program to the LCTF.

CAR 2008.4	GWR must expand their wildlife monitoring/research and safeguard measures for identifying and protecting native fauna. By the 2009 surveillance audit GWR must ensure wildlife monitoring and survey work covers the Lower Columbia Farm.
Deadline	2009 audit
Reference	FSC Indicators 6.1.d; 6.2; 6.5.e.; 7.1.g; 8.2.c.1; 10.8.b

Background/Justification: Plantation requirements in the FSC Standard for the Pacific Coast Region vary depending on whether the plantation occupies soils capable of supporting natural forests, forest soils, on former agricultural land with non-forest soils. However, The Pacific Coast Standard has no definition of “forest soils”, “soils capable of supporting natural forests”, or “agricultural soils”. This issue clearly needs to be clarified in the FSC US standards.

GWR claims that the majority of the footprint of their plantation is on non-forest soils. Photographic evidence has been provided (appendix A) showing mud flats and sedge occupying areas of the plantation prior to the dikes being built. Some of the photos also show forests in the background (appendix B). GWR also argues that even if some of the plantation is on forest soils, “natural forest” conditions are not possible because of the dikes and dams on the Columbia. GWR’s has put forth enough evidence to allow initial acceptance that the plantation should be held to the standard for agricultural soils not capable of supporting “natural forests”. However, this ruling is conditional upon GWR providing additional objective evidence by the 2009 surveillance audit.

Finally, Indicator 6.1.b. requires “Using available science and local expertise, current ecological conditions are compared to the historical conditions within the landscape context, considering the elements identified in 6.1.a.”, which has not been done for the LCTF.

CAR 2008.5	Provide additional objective evidence showing that the soils and environmental condition are not capable of supporting “natural forests” and/or that the plantation is grown on non-forest soils. In the process, address Indicator 6.1.a.
Deadline	2009 audit
Reference	Indicators 6.1.b., 10.4.a., 10.8.a., 10.8.b.

Background/Justification: Some of the GWR leases may not be renewed for an additional rotation. In cases where GWR is completing a final harvest on a block that will not be replanted- GWR is not permitted to sell this wood as FSC certified.

CAR 2008.6	GWR must implement a procedure to ensure final harvests on expiring leases are not sold as FSC certified, when those leases are to be converted to a non-forest use.
Deadline	2009 audit
Reference	FSC Criterion 6.10

Background/Justification: The area now occupied by the LCTF maintained some natural forest cover prior to conversion to agriculture. The analysis of CAR 2008.5

will provide some insight as to how much of the area was occupied by forest. For this reason, biological legacy (green tree, snags, den trees, and downed woody) retention requirements of Criterion 6.3 are much more ecologically relevant to the LCTF than they are on the eastside farms.	
CAR 2008.7	GWR must implement a set of guidelines for retaining biological legacies.
Deadline	2009 audit
Reference	FSC Indicator 6.3.b.3, 6.3.e.1

Background/Justification: A summary of research results was completed that can be made available, however, these do not cover the items listed in Criterion 8.2.	
CAR 2008.8	GWR must have available a summary of monitoring results that covers the requirements listed in Criterion 8.2.
Deadline	2009 audit
Reference	FSC Indicator 6.3.b.3, 6.3.e.1

6.2.7 General Conclusions of the Annual Audit

Based upon information gathered through site visits, interviews, and document review, the SCS audit team concludes that GWR’s management of the Boardman, Sand Lake, and Sandpiper poplar plantations continues to be in strong overall conformance with the FSC Pacific Coast Standard. Additionally, management of the Lower Columbia Tree Farm is in overall conformance with the FSC Pacific Conformance Standard. 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 assessment that GWR’s forest management program is in general conformance with FSC Principles 1 through 10. As such, continuation of the certification is warranted, subject to subsequent annual audits.

Dave Wager conducted the annual audit of GWR from July 20-23. The audit included on-site inspections of field operations as well as extensive interviews with GWR staff and contractors.

6.1 2009 Annual Audit

6.3 SURVEILLANCE DECISION AND PUBLIC RECORD

6.3.1 Assessment Dates

Dave Wager conducted the annual audit of GWR from July 20-23. The audit included on-site inspections of field operations as well as extensive interviews with GWR staff and contractors.

6.3.2 Assessment Personnel

Dave Wager

Mr. Wager is Director of Forest Management Certification for SCS. During his 9 years as Director, Mr. Wager has overseen the day-to-day operations of the program and conducted Forest Management and Chain-of-Custody evaluations throughout the world. Recent evaluations conducted by Mr. Wager include Minnesota DNR, Wisconsin County Forests, State of PA Bureau of Forestry, State of Massachusetts, Perak ITC- Malaysia, and Collins Pine Lakeview and Almanor Forests. In his role as Program Director, Mr. Wager oversees all first-time certification evaluations, annual audits, and contract renewal certifications on approximately 60 active clients. 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.

6.3.3 Assessment Process

The following general steps were undertaken as part of the 2009 audit:

- Additional consultation with FSC US about the plantations on agricultural, forest, and non-forest soils
- Review of 2005-2008 certification reports
- Review of management plans for Boardman, Sandpiper, and Lower Columbia Tree Farms
- Completion of the field audit
- Synthesis of findings, and judging performance relative to the FSC Pacific Coast Standard
- Preparation of the written certification evaluation report, and the public summary

The field portion of the audit included a broad array of field sites designed to illustrate a cross-section of hybrid poplar management activities. During the field audit, the SCS auditors engaged in personal interviews with GWR staff and contractors.

Monday July 20, 2009; Boardman Tree Farm

Office Discussions (3 p.m. – 5 p.m.)

(GWR Participants: Don Rice, Mike Berk, Luke Maynard, Cory Boswell, Andrew Bourque, and Bruce Summers)

Topics covered:

- Organizational changes
- Budgets discussions reduced crop care and irrigation budgets
- Contractor training
- Work instructions/work standards
- Integrated pest management- and 2009 issues

Field Stops:

- Production Plot, Field 703
 - Pruning trials
- Northeast Area of Farm- defoliation from gluphisia- trees have leaved out again but canopy is thin
- Backflush pools- no evidence of aquatic life/habitat
- Koschia weed control on perimeter near 806
- Field 906- 2008 fire burned non-crop area; seeded with annual in March 2008 (no restoration of native vegetation at this site);
- Field 906 web worm activity
- Pole planting to reduce deer browse and improve form

Tuesday July 21, 2009; Sandpiper Tree Farm

Topics covered and field stops:

- Watercourse management procedures
- Field 707 discussed streamside management zone requirements of Pacific Coast Standard
- Chemical control of noxious weeds
- Culvert maintenance
- Contractor interview: Jan Magiteaux of MJ's - safety procedures covered
- Patterson creek/ditch- dredged adjacent to Field 734; culvert replacement
- Integrated Pest Management- owl box program began 2008/2009—50% occupancy

Contractor and Partner Meetings at Boardman Tree Farm

- Earl Perkins- main contractor for eastside farms handling integrated pest management, site preparation, and other activities
- Meeting with WSU Entomology (GWR contractor) to discuss research and integrated pest management activities on eastside farms.

July 22 - July 23, 2009; Lower Columbia Tree Farm

Topics covered and field stops:

- Scappoose District-
- Site preparation with glyphosate and oust; whip planting to reduce deer damage;
- Biological legacy policy- planting and leaving existing non-crop trees
- Legacy tree plantings- alder, spruce, aspen, cedar
- Perch sites (owls/raptors) for biological control
- Ditch maintenance in Westport District- hand spaying of herbicide along ditches
- Beaver District- Field 02145 Harvested 2007; 02395 blackberry control mowing); 400 tree planting; Field 02455 planting corner with natives
- Marshland District- Field 06020
 - Louisiana Swamp (eagle nest site); Graham creek, restoration opportunities
- Midland District- Field 05355- meandering channel and retention efforts, raptor perch sites.
- Chemical storage facility
- Discussion with Meagan Nuss about characterizing soils and past vegetation types of LCTF

6.3.4 Status of Corrective Action Requests Open at Start of 2009 Audit

Background/Justification: Projects with the potential to cause impact (note: impacts can be positive or negative) in the environment and/or in the local community are occurring in the absence of a project/site level environmental impact assessment. The noted example during the 2008 audit was the introduction of 1800 goats for vegetation control.	
CAR 2008.1	GWR must develop a program to undertake site/project level impact assessments to evaluate and mitigate the social and environmental impacts of the management activities.
Reference	Indicator: 6.1.c
Deadline	2009 surveillance audit
Action Taken By Certificate holder/Auditor Comments (2009)	
<p>GWR Response: Impact assessment forms developed. Impact assessments completed on four major activity changes. Completed assessments were reviewed at April GMS Quarterly Review. Completed assessments are posted on GWR Intranet</p> <p>SCS Findings: GWR developed the necessary procedures and program for project level activity impact assessments. The example of a recent assessment for bio-solids was presented to SCS. The effort completed to-date fully warrants closure of CAR 2008.1. GWR still must develop an approach for determining what activities require an impact assessment. The approach should err on the side of more covering a fuller range of</p>	

activities, particularly given the fact that none of the plantations have had a comprehensive property-wide environmental impact assessment associated with the creation of the plantations.

Status July 2009: Closed. Also, see related CAR 2009.1

Background/Justification: GWR cannot currently demonstrate that its Lower Columbia Tree Farm Management (LCTF) Plan is in conformance with Indicator 10.8.b. *On former agricultural lands, the use of exotic plant species (see Glossary) is contingent on credible scientific analysis (see Glossary) that the species is non-invasive and does not diminish off-site native biodiversity.* Hybrid poplar may be crossing with the native *Populus trichocarpa*, and or establishing itself outside of the plantation.

CAR 2008.2	Implement a monitoring approach to assess if exotic hybrid poplars are hybridizing with native <i>Populus trichocarpa</i> and/or establishing off-site on the LCTF.
Deadline	2009 surveillance audit
Reference	FSC Indicator 10.8.b

SCS Findings:
GWR hired a specialist, Cees van Oosten, to complete an initial survey/study for exotic hybrid impacts to native *Populus trichocarpa*. The summary is included in the Lower Columbia Tree Farm Management Plan. The initial survey was sufficient to address this CAR, and concluded a relatively low risk for impacts to native cottonwoods. Consultant recommends that a full survey be completed in 2010, with a follow-up every three years. Although there may be a low risk of impact- the magnitude of the implications to native biodiversity could be significant. Thus- there is an expectation to continue to monitor impacts to native cottonwood. GWR is planning to continue this monitoring effort- so no further actions related to this CAR are necessary.

Status August 2008: Closed.

Background/Justification: 10.5.d. In plantations on agricultural soils, at least 10% of the plantation area is restored to the ecosystem native to the site. GWR has not demonstrated how this requirement will be met on the LCTF.

CAR 2008.3	GWR must present and begin implementation of a timeline, action plan, and allocation of funding for restoring 10% of the plantation to “ecosystem native to the site”.
Deadline	2009 audit
Reference	FSC Indicator 10.5.d

GWR Response:
GWR’s interpretation of the Criterion 10.5 and Indicator 1.5.c is that lands be managed for

restoration and that the ultimate goal is to have 10% of LCTF in the ecosystem native to the site. This is not to say that that 10% of the area is presently in the ecosystem native to the site

and preserved in that state. Nor does this mean that the current state of the area has to meet any standard for habitat quality or ecological function. Particularly the wording of the Criterion that the “area ... shall be manage so as to restore the site...” lends itself to this interpretation.

In the case of LCTF, defining the "ecosystem native to the site" is challenging. The sites occupied by LCTF have been significantly altered from their historic state over the past hundred years with the diking and dredging of the Columbia River, making “native” and “natural” relative terms. In pre-settlement times, the region would have been influenced by daily tidal fluctuations and seasonal river flow. Construction of dams upstream have impacted those fluctuations in flows. Vegetation would have reflected a grass and sedge wetland with pockets of woody shrubs. Today, the LCTF property is nearly entirely controlled by drainage districts and has a post-settlement history of agricultural use. Even within this changed landscape, however, native species of trees, shrubs and grasses have established. Still, the floodplain drainage work is recent enough that ecological maturity has not occurred. In consultation with Natural Resources Conservation Service (NRCS), Oregon Department of Fish and Wildlife (ODFW), Columbia Land Trust and Ducks Unlimited, GWR has identified five currently existing habitat types that were elements of the native ecosystem prior to disturbance. These five habitat types exist in a mosaic of small pockets around the farm. Their condition covers a wide range, from relatively undisturbed with mostly native plant communities to degraded by the presence of invasive species, predominantly Himalayan blackberry and reed canary grass. Regardless of their current condition, these sites are being managed for restoration and contribute some measure of wildlife habitat or other ecological function. These five habitat types are:

- Riparian
- Wet Prairie
- Hardwood/conifer mix
- Grasslands
- Upland forest

GreenWood believes there are different types of restoration that can be appropriately applied to the environment in question, and is continuing to move in the direction of facilitating these

native ecosystems. The Lower Columbia River Estuary Partnership (LCREP) names five categories of restoration, one of which is enhancement. LCREP describes enhancement as improving selected attributes of an ecosystem, such as invasive species removal and planting native species. GreenWood conversations with local agencies have also highlighted the importance of enhancing to whatever degree possible on land that is not being farmed.

Continued enhancement of non-farmed property is anticipated, with the help of Ducks Unlimited and local wildlife biologists, for maintaining diversity in wildlife populations and creating environments mimicking flood plain conditions that were found in the local area prior to levee and drainage infrastructure construction. As previously mentioned, GWR has

recently engaged NRCS and ODFW, both of which have expressed interest in working with farm managers to develop appropriate reserve management plans.

SCS Findings

GWR prepared a report including GIS work quantifying (and qualifying to a lesser degree) existing areas of native vegetation with the plantations. Initial results show that 10% of plantations fall into riparian and non-cropped areas. Some restoration activities have begun, e.g., control of noxious weeds on eastside and LCTF. Planting of 400 trees on LCTF. Plans and budgets for restoration activities in 2010 have been prepared and presented to the SCS auditor. GWR established a timeline and action plan for 2010 that includes wet prairie restoration, grassland maintenance, tree planting, and wetland/salmon habitat mitigation. Expenditures on restoration activities across all three farms will range from \$3 to \$5 per acre, which does not include GWR staff time contributions and some significant noxious weed control expenditures. Based on these findings SCS can close CAR 2008.3.

Status August 2009: Closed

Background/Justification: GWR has not expanded their wildlife monitoring/research program to the LCTF.

CAR 2008.4	GWR must expand their wildlife monitoring/research and safeguard measures for identifying and protecting native fauna. By the 2009 surveillance audit GWR must ensure wildlife monitoring and survey work covers the Lower Columbia Farm.
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Deadline	2009 audit
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Reference	FSC Indicators 6.1.d; 6.2; 6.5.e.; 7.1.g; 8.2.c.1; 10.8.b
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Action Taken By Certificate holder/Auditor Comments (2009)

SCS Findings:

Several actions have been taken by GWR with respect to monitoring and safeguarding native fauna. These actions are detailed in the LCTF Fish and Wildlife Management Plan. The following actions, as excerpted from the plan, are evidence of the improved efforts:

- *Farm managers have met with representatives from Natural Resource Conservation Service (NRCS), Oregon Department of Fish and Wildlife (ODFW), and Ducks Unlimited (DU) for their guidance on appropriate wildlife management.*
- *GWR is working with federal, state and local stakeholders to identify projects that could improve fish passage and hydrologic functions while taking being fully mindful of the possible impacts to neighboring landowners and traditional land uses such as agriculture. GWR is pursuing the creation of a wetland and/or salmon habitat mitigation bank or project on the Louisiana Swamp.*
- *Invasive spp control- Nutria- Their negative impacts include burrowing that can weaken and compromise levees, overgrazing land loss of wet prairie habitat and displacement of native species such as muskrats. They are managed with traps and targeted on site.*

- *In lieu of GWR currently conducting its own scientific monitoring, managers rely on studies that have been completed by other groups that pertain to the farm area. For example, managers refer to OSU's Wildlife Explorer (<http://www.oregonexplorer.info/wildlife/> for a complete list of species found in Columbia County. ODFW has also assisted in identifying relevant species from the Oregon Conservation Strategy for the Coast Range ecoregion that are likely present on the farm property.*
- *Because of its endangered status, Columbian White-tailed deer is of special concern to the farm. The nearby Julia Butler Hansen Wildlife Refuge for the Columbian White-Tailed Deer, located in Cathlamet Washington, provides an excellent resource for deer monitoring. Surveys of deer have been conducted since 1985, and although they are not meant to represent total population counts, the information is still useful to observe trends over time. The surveys are conducted on property surrounding or occurring on LCTF land: USFS has commented that the years of highest deer population coincide with the years of the most extensive poplar production.*
- *Further, GWR has initiated a procedure to notify the Oregon Natural Heritage Program if rare species are ever identified on the tree farms. NatureServe, a network of 80 natural heritage programs located in all 50 states and outside of the country, lists 12 vertebrate animals and 2 vascular plants as species of concern located in Columbia County. Two animal species are listed as endangered under the Endangered Species Act, 9 animal species are threatened, and 2 vascular plants are threatened.*
- *GWR has initiated a training program to educate contractors and employees of the sensitive species that could be found in habitats similar to those found on the tree farms. This is accomplished at our annual contractor training day and our annual employee safety training day.*
- *Continued enhancement of non-farmed property is anticipated, with the help of Ducks Unlimited and local wildlife biologists, for maintaining diversity in wildlife populations and creating environments mimicking flood plain conditions that were found in the local area prior to levee and drainage infrastructure construction. As previously mentioned, GWR has recently engaged NRCS and ODFW, both of which have expressed interest in working with farm managers to develop appropriate reserve management plans.*

Despite the above developments, there is still a gap with respect to systematic monitoring of wildlife on both the eastside and LCTF. During the first term of certification for the Boardman Tree Farm there were regularly scheduled wildlife survey, (e.g., for small mammals, bats, birds, reptiles/amphibians). These surveys have ceased on the eastside and have not been extended to the LCTF. Thus while GWR has shown improvement in monitoring/safeguarding native fauna on the LCTF- as a whole there is a need for further monitoring across all farms. CAR 2008.4 will be closed, as this CAR was written with focus on the LCTF. CAR 2009.3 is issued due to remaining gaps in monitoring now occurring across both LCTF and Eastside farms.

Status July 2009: Closed; See related Minor CAR 2009.3

Background/Justification: Plantation requirements in the FSC Standard for the Pacific Coast Region vary depending on whether the plantation occupies soils capable of supporting natural forests, forest soils, on former agricultural land with non-forest soils. However, The Pacific Coast Standard has no definition of “forest soils”, “soils capable of supporting natural forests”, or “agricultural soils”. This issue clearly needs to be clarified in the FSC US standards.

GWR claims that the majority of the footprint of their plantation is on non-forest soils. Photographic evidence has been provided (appendix A) showing mud flats and sedge occupying areas of the plantation prior to the dikes being built. Some of the photos also show forests in the background (appendix B). GWR also argues that even if some of the plantation is on forest soils, “natural forest” conditions are not possible because of the dikes and dams on the Columbia. GWR’s has put forth enough evidence to allow initial acceptance that the plantation should be held to the standard for agricultural soils not capable of supporting “natural forests”. However, this ruling is conditional upon GWR providing additional objective evidence by the 2009 surveillance audit.

Finally, Indicator 6.1.b. requires “Using available science and local expertise, current ecological conditions are compared to the historical conditions within the landscape context, considering the elements identified in 6.1.a.”, which has not been done for the LCTF.

CAR 2008.5	Provide additional objective evidence showing that the soils and environmental condition are not capable of supporting “natural forests” and/or that the plantation is grown on non-forest soils. In the process, address Indicator 6.1.a.
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Deadline	2009 audit
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Reference	Indicators 6.1.b., 10.4.a., 10.8.a., 10.8.b.
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Action Taken By Certificate holder/Auditor Comments (2009)

SCS Findings:

A 10-page well supported report on the soils and vegetation of the LCTF was provided. The results of the study show that most of the farm would be characterized by low-lying floodplain (non-forest) vegetation. Elevation maps for the farm itself clearly confirm the area as floodplain. LIDAR mapping of the farm and adjacent areas show the mean elevation for each of the six drainage districts on which the LCTF has owned land is 2.56 feet (Beaver), 1.3 feet (Clatskanie), 1.06 feet (Magruder), 3.99 feet (Midland), 4.64 feet (Marshland), and 6.55 feet (Westport). From the LIDAR maps, the Columbia River water level ranges from 0 to 11 feet where the farm is located, which demonstrates how significant the tides would have affected the Lower Columbia-Clatskanie sub-basin in presettlement times.

Status August 2008: Closed

Background/Justification: Some of the GWR leases may not be renewed for an additional rotation. In cases where GWR is completing a final harvest on a block that will not be replanted- GWR is not permitted to sell this wood as FSC certified.

CAR 2008.6	GWR must implement a procedure to ensure final harvests on expiring leases are not sold as FSC certified, when those leases are to be converted to a non-forest use.
Deadline	2009 audit
Reference	FSC Criterion 6.10
Action Taken By Certificate holder/Auditor Comments (2009)	
SCS Findings:	
<p>SCS confirmed that no wood from leased land is currently being sold as FSC certified. GWR prepared a written policy on sale of wood as FSC Certified that states: <i>FSC must be harvested from land owned by LCTF and intended for continued forest use; OR it must be harvested from land leased by LCTF with a remaining lease term, renewal, extension or pending renegotiation and intended to continue as a forest use</i></p>	
Status July 2009: Closed	

Background/Justification: The area now occupied by the LCTF maintained some natural forest cover prior to conversion to agriculture. The analysis of CAR 2008.5 will provide some insight as to how much of the area was occupied by forest. For this reason, biological legacy (green tree, snags, den trees, and downed woody) retention requirements of Criterion 6.3 are much more ecologically relevant to the LCTF than they are on the eastside farms.	
CAR 2008.7	GWR must implement a set of guidelines for retaining biological legacies.
Deadline	2009 audit
Reference	FSC Indicator 6.3.b.3, 6.3.e.1
Action Taken By Certificate holder/Auditor Comments (2009)	
SCS Findings:	
<p>GWR developed and began implementing a biological legacy program for the LCTF. Wildlife tree retention guidelines for GWR focus on retention and protection of non-crop trees and woody perennials. As stated in the guidelines: <i>GWR requires retention and protection of non-crop trees and woody perennials in a variety of locations at LCTF. These include boundary areas (manmade ditches, internal sloughs, levees, and ownership boundary lines), non-productive cropland (low elevation areas, poor soil conditions, and footprints of previous infrastructure), unprotected areas (from tidal or freshets) and upland soil/topography sites.</i></p> <p>Additionally scattered reserve areas are intended to provide for biological legacies- <i>In non-farmed portions of LCTF vegetation is allowed to grow in a 'natural' state excepting invasive or non-native species. This allows structure and diversity to develop. Cover is provided for large mammals (coyotes, deer, raccoons) and nesting and roost sites for raptors common to the region. This also encourages small mammals, songbirds, and some waterfowl species that may not thrive in the more monoculture type environment found within our operational fields.</i></p>	
Status July 2009: Closed	

Background/Justification: A summary of research results was completed that can be made available, however, these do not cover the items listed in Criterion 8.2.	
CAR 2008.8	GWR must have available a summary of monitoring results that covers the requirements listed in Criterion 8.2.
Deadline	2009 audit
Reference	FSC Indicator 6.3.b.3, 6.3.e.1
Action Taken By Certificate holder/Auditor Comments (2009)	
SCS Findings: A summary of monitoring results was provided that covers the topics listed in Criterion 8.2. As noted earlier additional monitoring of fauna is necessary (See CAR 2009.3)	
Status July 2009: Closed	

6.3.5 General Conclusions of the Annual Audit

Based upon information gathered through site visits, interviews, and document review, the SCS audit team concludes that GWR's management of the Boardman, Sand Lake, and Sandpiper poplar plantations continues to be in strong overall conformance with the FSC Pacific Coast Standard. Additionally, management of the Lower Columbia Tree Farm is in overall conformance with the FSC Pacific Conformance Standard. 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 assessment that GWR's forest management program is in general conformance with FSC Principles 1 through 10. As such, continuation of the certification is warranted, subject to subsequent annual audits.

6.3.6 New Corrective Action Requests and Recommendations

Non-conformance: GWR cannot demonstrate full conformance with <i>6.1.c. Prior to the commencement of management activities, potential environmental impacts and their cumulative effects are evaluated.</i> The following activities were noted to occur in 2009 without an environmental impact assessment.	
<ul style="list-style-type: none"> - Aerial application of Steward - Re-seeding a burned area of the Boardman plantation - Dredging a drainage creek/ditch on Patterson Creek that flows into Glade Creek 	
While impact assessments did occur for other projects. SCS concludes that there is no process for determining when impact assessments are to be done. The approach should err on the side of covering a fuller range of activities, particularly given the fact that none of the plantations have had a comprehensive property-wide environmental impact assessment associated with the creation of the plantations.	
CAR 2009.1	GWR must develop and implement an approach for determining what activities require an impact assessment.
Deadline	2010 Annual Audit
Reference	Indicator 6.1.d

Note: At the time of drafting the report Major CAR 2009.2 was issued, however, upon further review it was determined that this CAR was not warranted.

Non-conformance: GWR has not fully met Indicator 8.2.c.1. *Forest owners or managers periodically monitor and assess (1) their contribution toward recovery goals for threatened and endangered species in relation to changes in major habitats and populations, (2) changes in major habitat elements, and(3) presence and/or absence of and changes in the occurrence of Rare species.*
 CAR 2009.3 is issued due to remaining gaps in monitoring now occurring across both LCTF and Eastside farms.

CAR 2009.3	GWR must ensure monitoring covers the requirements of 8.2.c.1.
Deadline	2010 Annual Audit
Reference	Indicator 8.2.c.1

Non-conformance: GWR has not fully met indicators 6.5.o, p, and q
 The minimum FSC standards from 6.5.p, 6.5.q, and 6.5.r are as follows:

The standards call for the following buffer zones

	STREAM	CATEGORY	(FSC STANDARD)	
	A	B	C	D
Inner Buffer	50	25	0	0
Outer Buffer	100	75	75	0
Total Buffer	150	100	75	0

These guidelines are not covered in relevant SOP. Proposed harvest site on the Sandpiper farm did not have appropriate no cut buffer against Glade Creek.

CAR 2009.4	GWR must ensure watercourse protection actions are consistent with the requirements of the FSC Pacific Coast standard.
Deadline	2010 Annual Audit
Reference	Indicator 6.5 o, p, and/or q

Non-conformance: GWR has not met indicator 6.6.d. <i>Chemicals are used only when and where they pose no threat to supplies of domestic water, aquatic habitats, or habitats of Rare species.</i> On the Lower Columbia Tree Farm formulas not labeled for aquatic use were in use.	
CAR 2009.5	GWR must ensure watercourse protection actions are consistent with Indicator 6.6.d of the FSC Pacific Coast standard.
Deadline	2010 Annual Audit
Reference	Indicator 6.6.d.

OBSERVATIONS:

Observation 2009.1: GWR should implement a procedure to ensure adjacent landowners are notified of upcoming herbicide/pesticide applications- particularly when aerial application is being used

Observation 2009.2 : GWR should try to recruit more environmental stakeholder participation in the Community Advisory Committee.

Observation 2009.3: GWR should ensure that first aid kits are readily available in all contractor field vehicles.

7.0 SUMMARY OF SCS COMPLAINT INVESTIGATION PROCEDURE

The following is a summary of the SCS Complaint Investigation Procedure, the full version of the procedure is available from SCS upon request. The SCS Complaint Investigation Procedure is 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.

The SCS Complaint Investigation Procedure is a first-stage forum and mechanism for hopefully resolving issues, thereby avoiding the need to involve the FSC. A complaint may come from either clients (e.g., forestland owner, mill owners, manufacturer or retailer, brokers) or from other parties such as interested stakeholders. To have standing under this Procedure, complaints must be in writing, accompanied by supporting evidence, and submitted within 30 days of the date in which the action triggering the complaint occurred.

The written complaint must:

- Identify and provide contact information for the complainant
- Clearly identify 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 a FSC requirement, being as specific as possible with respect to the applicable 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, rectify the matter.

Written complaints should be submitted to:

Dr. Robert J. Hrubes
Senior Vice-President
Scientific Certification Systems
2000 Powell Street, Suite 1350
Emeryville, California, USA94608
Email: rhrubes@scscertified.com

As detailed in the *SCS-FCP Certification Manual*, investigation of the complaint 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.