Section 7

Administration and Implementation Commitments

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7 Administration and Implementation Commitments

The Commitments

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Plum Creek recognizes that the strength of the NFHCP will lie in its "on-the-ground" implementation. An explicit objective in the development of this plan was to avoid academic prescriptions that may be based on science, but are too complex or theoretical for forester managers, technicians, and logging contractors to effectively apply on the ground.

Continuous improvement monitoring is featured as the foundation upon which the NFHCP adaptive management strategy is built, as shown in the next section. But the first step toward improvement of field applications is for Plum Creek to implement them, then go back and evaluate how effective they were. In this way, Plum Creek's commercial forestry operations may be continuously improved.

Field-testing prescriptions. The Plum Creek NFHCP Team began training 72 Plum Creek foresters on key ideas used in the development of NFHCP prescriptions in the summer of 1998. Training and field discussions included the following:

- Familiarization with the Channel Migration Zones (CMZ) classification system.
- Implementation of NFHCP riparian prescriptions.
- Recognition of stream morphology types.
- Identification of legacy road hot spots.

Why field test? Prescriptions being developed by the NFHCP team were field-tested as part of routine harvest project preparation and actual logging. The two-way training included feedback to the NFHCP team on the practicality of prescriptions that were subsequently refined. Thus, the continuous improvement cycle for the NFHCP has already begun. In this way, practical field-testing combines with training to produce prescriptions as sound operationally as they are scientifically. The field testing gives both Plum Creek and the Services greater confidence that the commitments will work on the ground and that Plum Creek can anticipate success in living up to them.

It is appropriate to place emphasis on sound science as a basis for HCP development. Plum Creek believes participation from those who will be implementing these plans is equally important, but is often overlooked. The following commitments seek to build upon the continuous improvement basis that already characterizes the NFHCP.

A1: Field Implementation Manual

Plum Creek will produce an NFHCP field implementation manual for use by Plum Creek foresters within 3 months of issuance of the Permit. The manual will include working definitions and prescription keys to ensure consistent implementation of NFHCP commitments.

Rationale:

The thoughtful development and distribution of sound working tools for consistent implementation is an important link between prescription development and prescription implementation. A descriptive field manual will increase the effectiveness of NFHCP commitments. A number of the appendices included in this document will serve as inserts for the field implementation manual.

A2: Forester and Contractor Training

Plum Creek will provide NFHCP prescription training for foresters responsible for implementing various elements of the plan within 4 months of Permit issuance and every other year thereafter. This training will also be extended to key contractors. The Services will be invited to participate in these training workshops. Training will provide an overview of the entire NFHCP, but will primarily focus on the details of the road and riparian commitments. This will include education on the NFHCP enhanced BMPs, discussion of specific NFHCP milestones (for example, road upgrading schedule), road BMP classification, hot spot management planning, and field identification of stream channel types and channel migration zones.

Rationale:

As discussed, training is an excellent two-way communications link. It is also essential for ensuring that NFHCP prescriptions are fully and correctly implemented.

A3: Logger Certification and Training

Plum Creek will require any logging contractor working on Plum Creek lands in the Project Area to be certified as "trained" by the training and certification program being used in the state where the logger is based within 2 years of Permit issuance.

Additionally, Plum Creek will require that logs purchased from other landowners in the Planning Area will be harvested by loggers certified as trained, or that the project will be inspected by a Plum Creek forester to ensure sound stewardship practices.

Rationale:

In conjunction with the Sustainable Forestry Initiative, the timber industry and logger associations have developed programs that certify professional loggers in the application of forest practices and sound land stewardship principles. This gives stewardship-conscious landowners greater assurance the loggers they hire will be aware of and properly implement BMPs. It also gives mills similar assurance good stewardship was implemented in the harvesting of purchased logs.

Montana Accredited Logging Professionals

In 1994, the Montana Logging Association began the Accredited Logging Professional program to educate loggers in three key areas and recognize their training through accreditation: a 56-credit commitment. The three areas are:

- Forest stewardship
- Logging safety
- Water quality and fisheries habitat protection

There is also a 32-credit per year continuing education requirement. At present, over 137 logging companies and individuals are accredited in good standing. As well as those meeting the Accredited Logging Professional requirements, more than 1,000 loggers have received training in the proper implementation of Forestry BMPs and Streamside Management Zone rules for water quality and fisheries habitat protection. "We believe that the training of loggers strongly contributes to the continued improvement in Montana BMP audit results," said Montana Logging Association forester, Patrick Heffernan.

This commitment is significant in that it also extends conservation benefit to harvest activities on other landowners' properties within the Planning Area.

A4: NFHCP Internal Audits

Plum Creek will perform internal audits of the implementation of NFHCP measures annually for the first 3 years of the plan as a continuous improvement and training opportunity in the early stages of the plan. Metrics to be used in the audits are discussed in A6. Services personnel will be invited to participate.

Rationale:

Internal audits are valuable for more than merely measuring compliance. They allow the interchange between forester, scientist, logger, and manager over specific measurable parameters that will continually improve Plum Creek's performance. Just as the NFHCP will adapt to meet changing scientific understanding, internal audits provide the opportunity to adapt to meet increased understanding of the operational challenges of implementation.

A5: NFHCP External Audits

Plum Creek will hire a qualified environmental auditing firm to audit NFHCP implementation every 5 years throughout the life of the plan using metrics described in A6, *Metrics and Reporting*. Results of these audits will be reported to Plum Creek and the Services to gauge the success of plan implementation as well as to identify opportunities for improvement.

Rationale:

A third-party auditor adds value to the implementation monitoring tasks by providing a greater level of expertise to the auditing task and by bringing an independent observer to the evaluation.

A6: Metrics and Reporting

Plum Creek has developed performance metrics for each of the NFHCP commitments, as shown in Table NFHCP7-1, and will report accomplishments and activities according to those metrics to the Services. There are two categories of reporting:

- **Minor reporting** will be performed on an annual basis and will constitute the basic implementation metrics, the numeric representation of NFHCP implementation for the previous calendar year.

- **Major reporting** will be performed every 5 years and will be combined with 5-year effectiveness monitoring results as well as a summary documenting successes and opportunities for improvement.

The specific metrics for reporting and auditing are listed in Table NFHCP7-1.

The use of metrics in determining management response is described in Section 8, Table NFHCP8-1.

Rationale:

The NFHCP commitments themselves are the performance standards of the conservation plan and are used to define activities intended to meet the specific habitat objectives and, ultimately, the NFHCP biological goals. The metrics serve as the means of measuring progress in achieving those performance standards. Regular reporting of meaningful metrics will ensure NFHCP implementation is occurring and is on track to achieve the targets established. A record of annually reported metrics also provides the numeric baseline to audit. Metrics measure the quantity of performance while audits assure the quality of performance.

TABLE NFHCP7-1
Description and Frequency of NFHCP Reporting Performance Metrics

NFHCP Commitment	Reporting Performance Metric(s)	Annual	5-Year
EP1—Environmental Principles	No specific metric. Compliance subject to third-party audit.		X
	Percent of total harvested acres clearcut, as reported internally with Environmental Principles Metrics.	X	
R1—BMP Compliance	Forestry BMP/FPA implementation rate (percent of total practices evaluated), as determined by state and other third-party audits.		X

TABLE NFHCP7-1
Description and Frequency of NFHCP Reporting Performance Metrics

NFHCP Commitment	Reporting Performance Metric(s)	Annual	5-Year
R2—New Road Construction	Enhanced BMP compliance rate (percent of total practices evaluated), as determined by third-party audits.		X
	New roads constructed (miles), by Planning Area Basin.	X	
	Ratio of miles of road upgraded plus miles abandoned to miles constructed, by Planning Area Basin.	X	
R3—Road Condition Tracking	BMP status of Project Area roads (percent in compliance, percent out of compliance, percent Hot Spot).	X	
R4—Road Condition Inspections	Inspected (BMP verified) road length (percent of total).	X	
R5—Upgrade of Old Roads	Length of road upgraded (meets BMPs) by priority bin and Planning Area Basin (percent).	X	
R6—Hot Spot Treatment	Number of Hot Spots treated per action plans, as a percent of total.	X	
R7—Abandonment of Surplus Roads	Length of road abandoned as a percentage of the length of surplus road by Planning Area Basin.	X	
R8—Periodic Re-inspection and Maintenance	No specific metric. Compliance subject to third-party audit.		X
R9—Road Sediment Delivery Analyses	Number of Road Sediment Delivery Analyses completed.	X	
R10—Poaching Mitigation	No specific metric. Compliance subject to third-party audit.		X
R11—Road Restrictions	Closure status of Project Area roads.	X	
Rp1—State Riparian Rules as a Basis	State riparian regulation compliance rate (percent of total practices evaluated), as determined by state and other third-party audits.		X
Rp2—High Sensitivity CMZs (Tier 1)	Riparian rule compliance (percent), as determined by third-party audits.		X
Rp3—Moderate Sensitivity CMZs (Tier 1)			
Rp4—High & Moderate Sensitivity CMZs (Tier 2)			
Rp5—Small Stream CMZs			
Rp6—High Sensitivity Streams without CMZs			
Rp7—Headwater Streams, Both Perennial & Connected			
Rp8—Interface Caution Areas			
Rp9—Riparian Harvest Deferrals	No specific metric. Compliance subject to third-party audits.		X

TABLE NFHCP7-1
Description and Frequency of NFHCP Reporting Performance Metrics

NFHCP Commitment	Reporting Performance Metric(s)	Annual	5-Year
G1—Grazing BMPs	The total number of grazing leaseholder requirements met as a percentage of the total number of leaseholder requirements, as reported by local field offices.	X	
	Third party audit qualitative determination of implementation of leaseholder requirements and meeting intent of BMPs based upon sample audit.		X
G2—Fenced Exclosures	Length of stream fenced as a percentage of total miles of stream determined to require fencing per Lg1.	X	
G3—Evaluate Long-Term Effectiveness of Grazing BMPs	No specific metric. Compliance subject to third-party audit.		
G4—Status of Vacated Leases	No specific metric. Compliance subject to third-party audit.		X
G5—Rancher Training	Number of rancher training workshops conducted.		X
L1—Land Use Principles	No specific metric. Compliance subject to third-party audits.		X
L2—Fed. Agency & Not-for-Profit Conservation Orgs.	A balance sheet will be kept tracking land transactions by proportionality ratio.		X
L3—Conservation Dispositions			
L4—Restricted Dispositions—LUCAs			
L5—Conservation-Neutral Dispositions			
L6—Unrestricted Dispositions			
L7—Land Acquisitions			
L8—Land Exchanges			
L9—Proportionality Ratios			
Lg1—Assessment – Riparian Condition Survey	No specific metric. Compliance subject to third-party audit.		X
Lg2—Implementation—Riparian Vegetation Restoration	Length of stream with riparian restoration projects implemented as a percentage of total length determined to require restoration.		X
Lg3—Monitoring—Riparian Vegetation Restoration	No specific metric. Compliance subject to third-party audits.		X
Lg4—Engineered Habitat Restoration	No specific metric. Compliance subject to third-party audits.		X
Lg5—Diversions	Number of diversions with management plans as a percentage of total.	X	

TABLE NFHCP7-1
Description and Frequency of NFHCP Reporting Performance Metrics

NFHCP Commitment	Reporting Performance Metric(s)	Annual	5-Year
Lg6—Brook Trout Suppression in Gold Creek	No specific metric. Compliance subject to third-party audit.		X
Lg7—State Fish & Game Enforcement Agreements	No specific metric. Compliance subject to third-party audit.		X
Lg8—Watershed Group Participation	No specific metric. Compliance subject to third-party audit.		X
A1—Field Implementation Manual	Date that implementation manual was completed.	X	
A2—Forester & Contractor Training	Dates training sessions were held and number of foresters/contractors trained.	X	
A3—Logger Certification & Training	Number of loggers certified by state programs as a percentage of contractors.	X	
A4—NFHCP Internal Audits	Number of NFHCP practices internally audited.	X	
A5—NFHCP External Audits	Number and type of external audits conducted.	X	
A6—Metrics and Reporting	Not applicable.		
AM1—Adaptive Management; Commitment to Management Changes	Number of NFHCP changes.		X
AM2—Core Adaptive Management Projects	No specific metric. Compliance subject to third-party audit.		X
AM3—Changed Circumstances	Number of changed circumstances invoked.	X	
AM4—Native Fish Assemblages	Number of native fish assemblages with plans developed, implemented. Compliance subject to third-party audit.	X	

[1]Best Management Practice
[2]Channel Migration Zone
[3]Land Use Conservation Areas