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

Collins Almanor Forest

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

CERTIFICATION REGISTRATION NUMBER SCS-FM/COC-00006N

Submitted to:

Collins Pine Company Collins Almanor Forest P.O. Box 796 Chester, CA, 96020

Lead Author: Walter Mark

Date of Field Audit: July 21-23, 2008

Date of Report: August 31, 2008

Certified: July 31, 2003

By:

SCIENTIFIC CERTIFICATION SYSTEMS 2200 Powell St. Suite Number 725 Emeryville, CA 94608, USA www.scscertified.com

SCS Contact: Dave Wager dwager@scscertified.com
Client Contact: Jay Francis, Forest Manager jfrancis@collinsco.com

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.scscertified.com) no less than 30 days after issue of the certificate. Section B contains more detailed results and information for the use of the Collins Pine Company.

FOREWORD

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by Colins Pine Company to conduct a certification evaluation of its Collins Almanor Forest (CAF) estate. Under the FSC/SCS certification system, forest management operations meeting international standards of forest stewardship can be certified as "well managed", thereby enabling use of the FSC endorsement and logo in the marketplace.

In July 2008, 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 three 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 Collins Pine Company, for the management of its Collins Almanor Forest estate. In the event that a certificate is awarded, Scientific Certification Systems will post this public summary of the report on its web site (www.scscertified.com).

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SECTION A- PUBLIC SUMMARY AND BACKGROUND INFORMATION 1.0 GENERAL INFORMATION

1.1 FSC Data Request

Applicant entity	Collins Pine Company - Chester, California
Contact person	Jay Francis, Forest Manager
Address	Collins Pine Co., P.O. Box 796, Chester, CA, 96020
Telephone	530.258.4401
Fax	530.258.4266
E-mail	jfrancis@collinsco.com
Certificate Number	SCS-FM/COC-00006N
Certificate/Expiration Date	July 31, 2008
Certificate Type	single FMU
Location of certified forest area	
Latitude	E/W 40 degrees 18 minutes
Longitude	N/S 121 degrees 49 minutes
Forest zone	Temperate)
Total forest area in scope of certificate which is:	
privately managed ¹	94,000 ac
state managed	0 ac
community managed ²	0 ac
List of high conservation values present ³	HCV 1-6
Chemical pesticides used	
Area of production forest classified as 'plantation'	0 ac
for the purpose of calculating the Annual	
Accreditation Fee (AAF)	
Area of production forest regenerated primarily by	0 ac
replanting ⁴	
Area of production forest regenerated primarily by	94,000 ac
natural regeneration	
List of main commercial timber and non-timber	Pinus ponderosa ponderosa pine
species included in scope of certificate (botanical	Pinus lambertiana sugar pine
name and common trade name)	Pinus contorta lodgepole pine
	Pinus jeffreyi Jeffrey pine
	Pinus monticola western white pine
	Abies concolor white fir
	Abies magnifica red fir
	Pseudotsuga menziesii Douglas-fir
	Calocedrus decurrens incense-cedar
Approximate annual allowable cut (AAC) of	30.3 MMBF predominantly ponderosa pine, white
commercial timber	fir and sugar pine
Approximate annual commercial production of non-	None

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

³ 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

⁴ 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.

timber forest products included in the scope of the	
certificate, by product type	
List of product categories included in scope of joint	Saw logs, chips, and hog fuel
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.)	

Conversion Table English Units to Metric Units

Length Conversion Factors

10 convert from	το	multiply by
mile (US Statute)	kilometer (km)	1.609347
foot (ft)	meter (m)	0.3048
yard (yd)	meter (m)	0.9144
Area Conversion Factors		
To convert from	to	multiply by
square foot (sq ft)	square meter (sq m)	0.09290304

hectare (ha)

Volume Conversion Factors

<u>Volume</u>

acre (ac)

To convert from	to	<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 = 0.028317cubic 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.

0.4047

1.2 Management Context (not required for single slimf's)

As a forest land management enterprise located in the State of California in the Pacific Coast Region, management of the Collins Almanor Forest is subject to a host of local, state and federal regulations. The principal regulations of greatest relevance to forest managers in the State of California are associated with the following statutes:

Pertinent Regulations at the Federal Level:

- a) Endangered Species Act
- b) Clean Water Act (Section 404 wetland protection)
- c) Occupational Safety and Health Act
- d) National Historic Preservation Act

- e) Archaeological and Historic Preservation Act
- f) Americans with Disabilities Act
- g) U.S. ratified treaties, including CITES

Pertinent Regulations at State and Local Level:

- a) The California Forest Practice Regulations (FPR)
- b) California Endangered Species Act (CESA)
- c) Porter-Cologne Water Resources Act
- d) California Civil Code Section 1008
- e) California Environmental Quality Act (CEQA)

Regulatory Context for State and Local Regulations:

The lead agency for forest management in California is the California Department of Forestry and Fire Protection (Cal Fire). This agency oversees all commercial timber operations in the State of California and is responsible for document review for compliance with the requirements of all of the state level regulations. Documents associated with timber harvest (SYP and THP) are considered CEQA equivalent documents. The California Department of Fish and Game is lead for all endangered species concerns, including federally listed species (plants and animals), where authority has been delegated by the US Fish and Wildlife Service. The Central Valley Water Quality Control Board has responsibility for the protection of water quality related to silvicultural activities, beyond that provided by Cal Fire.

1.2.1 Environmental Context

The CAF is located at the broad eco-tone between the northern Sierra Nevadan and southern Cascadian eco-provinces. Generally, CAF is comprised of Sierra Mixed-Conifer stands with the true fir type found in isolated, higher elevation areas. This region of California is generally an "east-side" climate in which the bulk of precipitation occurs as snow during the months of November through April. The region is, however, susceptible to significant rain-on-snow events, as was the case in early January 1997. Elevations range from 4,000 to 6,000 feet. Topography varies widely across the CAF with areas of gentle slopes such as the "Chester Flat" and areas of steep slopes such as is found throughout the Wolf Creek Block and in the inner gorge of Mill Creek. Significantly, CAF is generally concentrated on the gentler terraces within each watershed and is therefore not high risk from mass erosion events while remaining an important consideration.

The principal commercial tree species on CAF are ponderosa pine and white fir with less abundant amounts of sugar pine, Douglas-fir, Jeffrey pine and incense-cedar. On the lower elevations of the western extent of the property, black oak can be found. Non-tree species common to the Sierra Mixed Conifer association include: white leaf manzanita, chamise, deerbrush, mahala-mat, and sagebrush. Mammalian fauna indigenous to the region include: black tail deer, mule deer, black bear, mountain lion, coyote, bobcat, red and gray fox, skunk,

chipmunk, fisher, wolverine, and porcupine. Bird species found in the area include bald and other eagles, hawks, owls, woodpeckers, osprey, goshawk, stellar jay, quail, heron, and blue grouse.

The region's continental climate is characterized by warm, dry summers and cold, wet winters, with large daily temperature ranges. Average wintertime temperature is 30 degrees Fahrenheit and average summertime temperature is 65 degrees. Extremes in temperature range from minus 20 degrees to 110 degrees. Precipitation is predominantly associated with eastward-moving Pacific storms, though summer thunderstorms also contribute to annual totals. Average annual precipitation ranges from 30 inches per year at Chester, California, to 80 inches per year at higher elevations. Approximately 75% of the precipitation falls as snow, from November through March.

Soils on the CAF reflect its location, straddling the Sierra Nevadan and Cascadian zones. In the southern portions of the property, soils are commonly decomposed granitics and metamorphics. The northern portion of the property is generally underlain by soils derived from volcanic parent material, ranging from basalt to rhyolite and andesite.

1.2.2 Socioeconomic Context

In the wider context of the area the forest forms part of a matrix of forest ownerships, both public and private, that provides aesthetic, economic and ecological benefit to the community. Collins Pine Company is an important component of the regional economy of northern Plumas and eastern Tehama counties. The Chester mill is the largest employer in the Chester area. The Collins family and its employee representatives, prominently including the forestry staff, have enjoyed a long and positive relationship with the community in and around Chester. The Collins pine Company provides jobs for around 200 people in the Chester, CA area through its forestry activity and associated mill. Further indirect input into the community is provided through local taxes and tourism and recreation in the general area and within the forest itself. Collins Almanor therefore plays a significant role in this rural area of northeastern California.

The forest holding extends west and south of Lake Almanor, in Tehama and Plumas counties. These counties may be characterized as resource dependent, with high levels of direct and indirect employment related to the timber industry. In response to shifting federal timber policies, forest management practices, and market fluctuations, the regional economy has experienced periods of boom and bust. The mill at Chester is therefore a significant employer in the region that upgraded in 2003.

Unlimited public access to the forest is maintained except in ecologically sensitive areas. Hunting and fishing, primarily by the local community is an important aspect of community access.

1.3 Forest Management Enterprise

1.3.1 Land Use

The Collins Almanor Forest is comprised of 94,000 acres located within Plumas and Tehama Counties, in northeastern California. The forest is primarily northern Sierra type with areas of southern Cascadian types. Prominent species are ponderosa pine, lodgepole pine, and true fir species, with lesser proportions of Douglas-fir, Jeffrey pine, incense-cedar and mixed hardwoods. Ownership of the Collins Almanor Forest (including limited areas where only timber rights are owned) is variably distributed among three ownership groups:

- Collins and Goudy Family Members (family descendents of E.S. Collins)
- World Division, United Methodist Church (New York, NY)
- Collins Pine Company (Portland, Oregon)

It is managed under a long-term management agreement between the owners and Collins Pine Company, which also owns and operates a sawmill in Chester, Ca. The relationship between the owners and the land managers is subject to oversight by three designated fiduciary agents

The historical record of the Collins Family involvement in California forestry began in 1902 with the initial purchase of timberland in Plumas and Tehama Counties in Northeast California by the partnership of Curtis, Collins and Holbrook (CC&H). By 1912, CC&H had acquired over 62,000 acres of the current CAF. A major purchase of heavily cutover land, now known as the Wolf Creek Block, was completed in the 1940's. Occasional purchases of mostly cutover timberland have been added to this base to create the current 94,000-acre CAF. Active management of CAF commenced in 1941 with the development of the mill site in Chester. Since that time, there have been 4 basic harvest cycles or "pass-throughs" of the forest, with each cycle largely driven by stand enhancement objectives.

After the initial award of certification in 1993, Collins Pine Company engaged in a major planning effort for the CAF, resulting in the approval of a Sustained Yield Plan (SYP) in 2003 which integrates timber management planning with watershed and wildlife objectives and constraints. The SYP is a 10-year document and will have to be revised and re-approved in 2013.

1.3.2 Land Outside Scope of Certification

No lands managed by Collins Pine Company as part of the Collins Almanor Forest are outside the scope of the certification.

1.4 Management Plan

1.4.1 Management Objectives

The CAF operates under an approved Sustained Yield Plan (SYP). This SYP describes the proposed, future management of approximately 94,500 acres of privately owned forestland

located in Plumas and Tehama Counties. Copies of the SYP are on file for review at the Shasta County Library in Redding, the California Department of Forestry and Fire Protection's Shasta-Trinity Unit Headquarters in Redding, CDF Lassen-Modoc Unit Headquarters in Susanville, CDF Cascade Area Headquarters in Redding, and at CDF State Headquarters in Sacramento.

Sustained yield plans are one of the mechanisms that timberland owners can use to meet the State of California's requirement for maintaining maximum sustained production. SYPs must include projections of timber growth and harvesting over a 100 year planning horizon, assessment of watershed and wildlife resources, and constraints of other resource values on timber production. Issues and mitigation measures that are adequately covered in an approved SYP may be cited by reference in individual Timber Harvesting Plans. This document and requires public review and approval by the Board of forestry. Following approval, SYPs are in force for a period of 10 years.

The forest management objectives as stated in the SYP approved in 2003 are as follows:

- Growth, yield and the standing inventory shall be managed so as to produce a sustained flow of sawlogs averaging 30MMBF, annually.
- Silvicultural systems shall be employed that address the owners desire to retain functional and visually attractive forests after harvest. Single tree selection has traditionally dominated CAF management. When implemented over broad stand conditions, however, single tree selection presents regeneration challenges that this SYP must address.
- Adaptations to past management that provide opportunities for pine regeneration will be vigorously explored. They include: continued use of biomass thinning in stagnated understories, an increased toolbox of marking prescriptions to address more varied stand conditions, and the modified use of true fir selection (removal of all non-pine trees in areas up to 2.0 acres), where appropriate.
- The primary wildlife objective is to maintain the vegetative components naturally found in CAF forest types and provide the key habitat elements needed to support all native wildlife.
- Another plan objective is to manage watercourses and adjoining buffer zones so as to maintain the quality and quantity of beneficial uses of waters flowing through CAF. Habitat.

1.4.2 Forest Composition

By a considerable margin, the most dominant timber type on the CAF is Sierra Mixed Conifer, which occupies 87% of the forested acres within the ownership, largely in the elevation band of 4,200 to 5,500 feet. This type is an association of five main tree species: ponderosa pine, sugar pine, Douglas-fir, white Fir, and incense-cedar. Within this type, stand proportions by species varies across the forest, but ponderosa pine, white fir, and sugar pine are the most prevalent. This association of species can be found intermingled as single trees or as small groups. At lower elevations, Sierra Mixed Conifer gives way to the Ponderosa Pine type. At elevations above the Sierra Mixed Conifer type is found the White Fir type,

which largely is limited to areas in the Northwestern portion of the CAF. In isolated areas characterized by poor fall/winter air drainage and high water table, pure stands of lodgepole pine are found. Hardwoods such as alder, dogwood, bigleaf maple, cottonwood and aspen can be found on moist sites within the CAF. Black Oak, the only upland hardwood species on CAF, is limited to the lowest elevations at the very western part of the property.

1.4.3 Silvicultural Systems

The entirety of the CAF is managed under all-aged silviculture, primarily single tree selection. However, due to the difficulties of assuring adequate regeneration of shade-intolerant species, primarily pines, when employing single tree selection silviculture in mixed-conifer forests, Collins foresters have been modifying their silvicultural prescriptions in recent years to better facilitate pine regeneration. Much more aggressive use of group selection as a means of harvesting and providing better opportunities for shade intolerant pine regeneration has been taking place since the last recertification audit in 2003. Planting efforts associated with this increase in group selection have also increased on the CAF.

1.4.4 Management Systems

The managing entity of the Collins Almanor Forest is:

Collins Pine Company P.O. Box 796 Chester, CA 96020

Current ownership of the Collins Almanor Forest (including limited areas where only timber rights are owned) is variably distributed between three ownership groups:

Collins Family Members General Board of Global Ministries, United Methodist Church (New York, New York) Collins Pine Company (Portland, Oregon)

The 94,000 acres comprising CAF is composed of 9 different variations in proportion of ownership between the above three groups, with the largest block (over 70,000 acres) being the lands of the former Curtis, Collins and Holbrook Company (CC&H). Undivided ownership of the former CC&H lands is roughly apportioned as: 55% to the United Methodist Church, General Board of Global Ministries, and 45% to individual members of the Collins family (descendants of E.S. Collins, the principal owner of CC&H).

The second largest component of CAF is the approximately 11,000 acres held by the Collins California Trust (CCT), whose beneficiaries are members of the Collins family. The Collins Timber Properties (CTP) component of the CAF amounts to approximately 3,200 acres with undivided interest held by Collins family members as well as Collins Pine Company. Minor holdings include Rock Creek Investors (a Collins family holding), parcels with exclusive title held by the United Methodist Church and lands held exclusively by Collins Pine Company,

which includes the mill site. Finally, the CAF includes approximately 1,300 acres of land for which Collins Pine Company, or the CC&H partnership, owns only the timber rights.

The CAF is divided into four geographically contiguous harvest blocks: Chester Block, Onion Summit Block, Rhyolite Block, and Wolf Creek Block. Within the four harvest blocks, specific cutting units have been delineated which generally are sized to be equal to a timber harvest plan (THP) operational area.

forestry services are provided by the professional forester (RPF) and forestry technician staff of the CAF. Contractors are hired by Collins Pine Company for most silvicultural operations. The contractors are selected based on cost, place of origin and past performance, with past performance weighed heavily in the selection process. All timber operators are Licensed Timber Operators (LTOs) in the State of California.

Training opportunities for all forestry staff are provided upon request of the individual staff member. The CAF provides travel expenses, registrations costs and pay while at approved training for staff members.

1.4.5 Monitoring System

The monitoring system is described under Principle 8.

1.4.6 Estimate of Maximum Sustainable Yield

Estimates of Maximum sustained yield are provided through the CAF sustained yield plan. This document provides extensive analysis of the timber resource broken down by ownership units and cutting block and further distinguishes between morphology, eco-type, watershed and other factors. The projected yield is estimated for a hundred year period based on selection, continuous cover prescriptions augmented by group cutting to encourage pine regeneration.

The Sustained Yield Plan has provided a more formalized and comprehensive framework for guiding management activities on the CAF; the SYP provides corroboration of the sustainability and ecological appropriateness of the annual allowable harvest. The allowable harvest is slightly below current growth and well below projected growth, due to alternatives and trade-offs selected in the final model, including areas where harvest will be reduced or not occur to protect HCVF attributes and other resource values. The SYP is a major step forward in understanding and integrating resource management, when compared to the "THP to THP" basis of management.

1.4.7 Estimated, Current and Projected Production

Considerations in the modeling of yield over time were that the basis for silviculture would remain primarily selection silviculture augmented by "true fir Selection" and "biomass thinning prescription", both prescriptions designed to encourage propagation of pine.

Estimated sustained yield in the SYP is given as 32 million board feet growing to 42.6

million board feet by the end of the hundred year period. The allowable annual harvest remains at 33 million board feet (mmbf). This allowable harvest level is designed to harvest 85% of growth, plus 2 mmbf of the approximately 3 mmbf of annual mortality. As a result of slow stand conversion to more vigorous, free-to-grow trees, net growth has increased from zero in the 1940's to approximately 350 board feet per acre per year now. Eventually, net growth is expected to reach approximately 425 board feet per acre per year.

Table 1.6.5.1 Growth Model Projections Results

Long term Sustainable Harvest Level = 42.62 MMBF per Year

Species Composition	1998	2098	Ending inventory	mbf/acre
% Inventory Sugar Pine	26%	29%	All acres	27.2
% Inventory Ponderosa	19%	15%	Less riparian areas	25.8
Pine				
% Inventory True Fir	42%	37%	Less riparian and 1995 Late Seral	24.3
-			Acre	

Sum of 100 years harvest 3,057.50 Average Annual growth 1st 20 years 367.5 bf/Acre/Year

MMBF

Table 1.6.5.2 Summary of actual harvest volumes (data provided by CAF 7/22/08)

<u>Year</u>				
Actual cut				
1999	25.9 MMBF			
2000	23.9 MMBF			
2001	17.6 MMBF			
2002	19.1 MMBF			
2003	38.1 MMBF			
2004	34.9 MMBF			
2005	34.1 MMBF			
2006	33.3 MMBF			
2007	37.4 MMBF			
2008	38.8 MMBF (expected)			

Average 30.3 MMBF/YR

1.4.8 Chemical Pesticide Use

CAF provided a list of all chemicals utilized on the forest. Only herbicides were utilized and only two types glyphosate and Imazyper were utilized. In 2006 only 5.5 acres were treated. In 2008 218 acres were treated in a rehabilitation project the Plateau Rehabilitation.

No other pesticides were utilized on the CAF. No chemical used are in violation of the FSC pesticide policy.

1.5 SLIMF Qualifications (SLIMF's only)

Not applicable.

2.0 GUIDELINES/STANDARDS EMPLOYED

As the applicant forest property is located in northeastern California, the certification evaluation that is the subject of this report was conducted against the duly-endorsed FSC Pacific Coast Regional Standard v. 9.0 approved May 9, 2005. 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 field portion of the annual audit occurred July 21 - 23, 2008.

3.2 Assessment Team

For this Recertification audit, the team included Dr. Walter R. Mark, and David Vesely. Dr. Mark acted as the team leader.

Dr. Walter R. Mark: Dr. Mark is a professor of forestry at California Polytechnic State University, San Luis Obispo and former Director of Swanton Pacific Ranch, the University's FSC Certified school forest. Dr. Mark specializes in forest health and silviculture. Dr. Mark is a consultant for SCS and is responsible for the audit. Dr. Mark is a registered professional forester in California (RPF No. 1250) with over 35 years of forestry experience in public and private forestry and higher education sectors. He has served as audit team member and leader for several certification, recertification, scoping, and annual audits over the past several years.

Mr. David Vesely: Mr. Vesely currently serves as the executive director of the Oregon Wildlife Institute, a 501(c) (3) organization dedicated to the conservation and enhancement of wildlife resources in both native and human-altered environments through research, education, and conservation planning. Mr. Vesely has an M.S. in Forest Science and has more than 15 years experience as an ecologist specializing in the assessment of human land use affects on wildlife populations. He has served on two previous SCS teams that participated in dual FSC/SFI demonstration audits for the Mt Hood and Fremont-Winema National Forests.

3.3 Assessment Process

3.3.1 Itinerary

Pre-audit activities included document review of the management system and review of previous audit reports (1.0 auditor days). Six auditor days were necessary to conduct the field portion of the audit and 1.5 auditor days to write and review the surveillance audit report. Therefore, a total of 8.5 auditor days were required to complete the 2008 recertification audit. Audit team met and went over audit itinerary and documentation, Sunday, July 20, 2008.

Day One - Monday July 21, 2008

0700-0800	Breakfast meeting - audit team and Jay Francis, Forest Manager, CAF
0800-1200	Opening meeting, office document review
1200-1800	Field audit

Day Two - Tuesday July 22, 2008

0600-0700	Audit team breakfast meeting
0700-0900	Audit team met with Jay Francis in the office to review the monitoring system
	including CFI plots, temporary inventory plots, renewal inventory and stream
	monitoring, as well as additional documentation.
0900-1800	Field audit

Day Three - Wednesday July 23, 2008

0600-0900	Audit team office interviews of CAF staff including Andy Juska, Bob
	Birdsall, and Eric O'Kelly, logging contractor, Clay Montgomery of A&M
	Logging, documentation review, including the 1920's forest survey and
	photographic evidence.
0900-1300	Audit team worked the rest of the morning on the preliminary audit findings.
1300-1500	Audit team presented preliminary findings to Jay Francis at the Collins Pine
	Company Chateau
1500	Conclusion of field audit

3.3.2 Evaluation of Management System (not needed for single SLIMF)

The scope of the 2008 recertification audit, as with all audits, included: document review, spending time in the field and office, interviewing management personnel, company staff, and interacting with outside stakeholders.

Site selections for the 2008 recertification surveillance audit were based upon current harvesting areas, areas of special concern (HCVF), and other operational areas. In addition to the specific areas listed below, each stop included inspections of best management

practices, THP documentation (where appropriate), resource protection measures, forest regeneration, and roads.

3.3.3 Selection of FMU's to Evaluate (not needed for single SLIMF)

The forest management operation undergoing certification consists of a single Forest Management Unit.

3.3.4 Sites Visited

Day One - Monday July 21, 2008

The audit started off with a breakfast meeting of the audit team members, Walter Mark and Dave Vesely and Jay Francis, forest manager, of CAF. The general background, purpose and objectives of the recertification audit were discussed; the documentation provided and still needed was discussed, along with items to be specifically visited in the field audit.

Table 2.3.1.a: Day One AM Itinerary

Activities	Licensee/Contractor	Comments
Met with CAF forest	NA	Opening session of audit with introductions
manager, Jay Francis,		and background information including
CAF Staff (Andy		purpose and objectives.
Juska, Dirk Embree,		Review documentation provided as
Jake Blaufuss, Eric		evidence.
O'Kelly, and Bob		Reviewed field audit schedule and
Birdsall), at CAF		participation.
Office in Chester		

Following the morning in the office the audit team and Jay Francis from CAF toured the field operations for the remainder of the day.

Table 2.3.1.b: Day One PM Itinerary

Activities	Licensee/Contractor	Comments
Bonanza THP,	Unknown	This THP included some group selection areas
harvested		of 1.5 to 2.0 acres, with advance regeneration
in 2005		saved. These were planted with mostly
		ponderosa pine in 2006. Herbicide treatment
		of the Manzanita understory occurred in 2005.
		The regeneration was very successful with a
		high proportion of pine. Property line blazes
		were observed during the drive to this site.
Rock Lake Overlook	NA	This is an area where no harvesting has taken
		place and the forest may represent another area
		of Type I old growth on the CAF. This is not
		confirmed. CAF has no plans to harvest in the
		area and the access to the stand is poor.

CFI Plot on Road 452	NA	The layout of a CFI plot was reviewed in the field. All trees are tagged with metal tags and painted lines at dbh. When trees are harvested from the plot, the metal tag is pulled off the tree and placed on the stump.
Bald Eagle Nest Site	NA	A known bald eagle nest site was visited to determine how the HCV was implemented on the ground. The nest site buffer was marked, the tree was marked and the nest has been monitored for several years. The nest was not currently occupied, although it was occupied during nesting season in 2008.
Water Trough THP, harvested in 2007 and 2008	Unknown	The County road is used to access the site where about 5,000 acres is in the THP. A water drafting site was visited and the measures taken to prevent sediment (rocking, sloping, brow log, spill material and screening on the intake) were discussed and viewed. The area was partially biomassed in the late 80's and early 90's and harvested in 2007, with reentry in 2008 to remove additional white fir. Road closure with a locked gate was observed on a part of the road, where the road ran along a stream. Closure was to prevent road damage and was effective. One landing was observed in a WLPZ that had untreated disturbed mineral soil.
East Green THP, harvested in 2007 Power House THP,	Unknown	The harvest level was about 5 MBF/A. The average across the forest runs from 5-7 MBF/A during harvest. The stumpage on the unit was reduced to promote biomassing. A small area was active that did not get finished prior to winter of 2007. The audit team was unable to view the operation closely, due to the lack of the proper safety equipment. This sale was marked for cutting using the
partially harvested in 2007 the rest is scheduled for harvest in 2008	Ulikilowii	selection silviculture. No biomass project is associated with this sale. The area was biomassed in 2000. Part of the sale area is being held for winter logging due to good access. Sugar pine trees being screened for white pine blister rust resistance were observed in the unit. This sale, as is the case with many on the CAF, has mixed ownership involved.
Aspen Rehabilitation Project	Unknown	This was an example of a project designed to enhance limited vegetation types on the CAF.

		Conifer encroachment was removed from the wet aspen area. Root sprouting from the aspen was occurring. Photo points were used to document before and after results. Photo points will be retaken every two years as part of the monitoring of the HCVF activity.
Harte THP,	Unknown	Part of the new RMP policy of rocking roads in
harvested in 2006		the WLPZ along Class I streams was observed
		along Butte Creek.
700 Road Fire from	NA	This fire started the day before the 65,000 acre
2007		Moonlight Fire on Labor Day. Due to an early
		reporting of the fire and suppression action this
		fire was limited to 3 acres.
Humboldt Road	NA	An experimental herbicide treatment with
Manzanita		glyphosate was done to test the efficacy of pre-
Treatment		treating Manzanita understory vegetation the
		year prior to harvest. The intent is to control
		the vegetation better by better timing of
		application and to have a better seedbed.

Day Two - Tuesday July 22, 2008

The second day of the audit started off with a breakfast meeting of the audit team members, following the breakfast meeting, the audit team met with Jay Francis at 7:00 am in the office to review the monitoring system including CFI plots, temporary inventory plots, renewal inventory and stream monitoring, as well as additional documentation.

Table 2.3.1.c: Day Two Itinerary

Activities	Licensee/Contractor	Comments
Park 40, Type II Old	NA	This stand has been treated by an
Growth stand		understory thinning on 30 acres, with
		10 acres remaining untreated for
		comparison. An interpretation trail
		describing the activities has been
		developed in the stand. Following
		the understory removal/biomassing, a
		prescribed burn was done in the fall
		to remove the accumulation of litter
		and duff. The Pacific Coast Trail
		passes through this stand.
Ryolite Soils area	NA	Some of the CAF has a ryolite soil
		type. This soil is a volcanic origin
		soil and is highly erosive.
		Vegetation in this area includes more
		lodgepole and Jeffrey pine and

Wilson Lake Road	NA	pinemat manzanita. Road management requires different techniques, for example, rocked fords do not work very well. Wilson Lake Road is a county road that was located in a riparian area. CAF worked with Tehama County and Lassen National Forest to move the county road from the riparian location to a CAF logging road. A right-of-way land swap was completed with Tehama County to accomplish this road location
Old Creek Bridge	NA	improvement. CAF installed a new rail car bridge at this location to replace an old collapsed log stringer bridge. A 1603 Stream Alteration Permit from Cal Dept of Fish and Game was required for the project. This is an example of the type of project completed under the RMP.
Plateau THP and Type I Old Growth Stand	NA	This THP was conducted adjacent to the Type I Old Growth that CAF obtained from the USFS when the public land survey was corrected. The old growth forest was walked to confirm that it had not been impacted by logging in the stand or by logging in the adjacent stand. Many road upgrades were observed in the road system as a result of the THP. These included waterbars, rolling dips, rocked fords and one pulled crossing and stream rehabilitation.
Onion THP biomass project and selection harvest	Sierra Land Management and IMPACT Resources	Interviewed a water truck operator, Norm Schwarz and faller, Dave Gallegos, on the drive in to the harvest area. Conducted interviews with truck driver, Bob Schneider and loader operator, Henry Merideth, as part of the COC audit. Reviewed the harvest area and the tree marking and retention. Discussed how Type III old growth was handled in the harvest operations.

K-Line THP planned	NA	Harvest area was marked for harvest
selection		in some areas. Two HCVF sites
		were reviewed for mitigation
		measures. One was a fen area on an
		old slide. The protection measures
		include exclusion from cutting and
		equipment operation in the fen. The
		second site was a Native American
		site which was marked for protection
		to exclude operations in a buffer area
		and use directional felling around the
		buffer to protect the site.
Cub Fire Complex	NA	The Onion Fire started on Saturday
1		June 21, 2008 around 2:30 pm from a
		lightning strike. CAF staff was at the
		fire site by 8:00 pm that evening;
		however, fire suppression efforts
		were not started by Cal Fire and the
		USFS until the next day. By the time
		the fire was contained approximately
		4,800 acres burned with about 1,700
		acres on CAF lands. Salvage
		operations are planned for this
		logging season, with both cable and
		tractor operations required.
		The Cub Fire burned about 100 acres
		on CAF lands.

Day Three - Wednesday July 23, 2008

The third day of the audit started with office interviews of CAF staff including Andy Juska, Bob Birdsall, and Eric O'Kelly by audit team member Walter Mark. One logging contractor, Clay Montgomery of A&M Logging was also interviewed. Additional documentation was reviewed in the office, including the 1920's forest survey and photographic evidence. Following the office session, the audit team worked the rest of the morning on the preliminary audit findings.

1:00 pm to 3:00 pm Audit team presented preliminary findings to Jay Francis at the Collins Pine Company Chateau

3.3.5 Stakeholder Consultation

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

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

Principal stakeholder groups of relevance to this evaluation were identified based upon lists of stakeholders from the Collins Pine Company, and additional stakeholder contacts from other sources. The following types of groups and individuals were determined to be principal stakeholders:

- Collins Pine Company employees, including headquarters and field
- contractors
- Contractors employees
- Purchasers of logs harvested on Collins Pine Company forestlands
- Local, State and Federal regulatory agency personnel

Prior to, during, and following the site evaluation, a wide range of stakeholders from the regional area were consulted in regard to their relationship with the Collins Pine Company, and their views on the management of the Collins Almanor Forest. Stakeholders included government and non-government organizations involved in forest management, contractors, and others. Stakeholders were contacted directly or with a phone contact. Comments were received via meetings and personal interviews "face-to-face", phone interviews. Individuals or groups not offering feedback are labeled "no response" ("NR"). Additional comments may have been received from individuals not wishing to reveal their identities.

Collins Almanor Forest has not received any stakeholder complaints or disputes since the previous evaluation, and stakeholder consultation by the audit team has not revealed any further stakeholder complaints or disputes.

Name &	Address	Phone/Fax/Email	Comments
Affiliation			
Clay Montgomery, LTO, A&M Logging	Onion Butte, CA		A&M Logging has been operating for three seasons with Collins Pine. They conduct conventional and salvage logging and work exclusively on the CAF. A&M Logging has to bid for jobs on the CAF and has found the evaluation process to be fair.
Eric O'Kelly, RFP, Forester, CAF	Chester, CA		Eric has worked at CAF for 14 years, starting in 1995 as a forestry technician. He has a Qualified Applicator Certificate and heads up

		the pesticide application for CAF. Eric has responsibility for seed banks, WPBR screening, and is working to increase group selection and planting to increase pine regeneration.
Bob Birdsall, Forest Technician, CAF	Chester, CA	Bob has been with CAF since 1976. He started as a logger in 1973 and took a job with Collins Pine as a logger. He worked for 1.5 years in the sawmill and transferred into forestry to head up the log quality area. He works with the LTO's as their main contact on log quality, logging quality, and roads. He works on logging administration and timing. The working conditions at CAF are good overall and there is good communication among the forestry staff.
Andy Juska, RPF, Forester, CAF	Chester, CA	Andy has worked for CAF for 10 years. He started as a Forest Technician. He heads up the inventory work and works on the growth modeling. Working at CAF has provided an overall good experience. The process for problems is good and it works OK. CAF is supportive of time for family and provides opportunities for training.
Henry Merideth, loader operator, Sierra Land Management	Montana	Started working in logging in 1970 for Columbia Logging. Has been working in present position for 6 weeks. He was interviewed as part of the COC process and as the loader operator is responsible for filling out the truck ticket and branding and painting logs on the load. Paid hourly with overtime. Normally he works from 4:30 am to 4:00 pm. Required safety equipment was present and used on site.

Bob Schneider, truck driver, Clear Creek Reload			Paid based on loads by the ton. He receives 30% of load rate and averages 4 loads per day from the current sale. He had the proper safety equipment present. He is in his 6 th year of driving log truck. He was interviewed as part of the COC audit and his load ticket was reviewed. He has had little direct contact with CAF.
Dave Gallegos, Faller, A&M Logging	Chester, CA		Dave has been a faller for 30 years and has worked for 47 different loggers. Pay is a daily rate and his normal day is 6 hours on the job falling. He has interaction with CAF staff almost daily to address production needs at the mill. Stated CAF has the best roads and the best logging of any area he has worked in his career.
Norm Schwarz, water truck operator, Dave Schlagel, LTO	Susanville, CA		Works hourly for the LTO as a driver. Has 34 years of experience as an equipment operator. Little contact with CAF.
Jared Tappero, RPF, Log Yard Supervisor, CAF	Chester, CA		Jared has worked for CAF for 10 years. His current role is to inventory log decks and schedule work for decking. He works with the USFS and other private forestry companies to procure logs for the mill.
Angela Wilson, Engineering Geologist	Central Valley Regional Water Quality control Board, Redding, CA	(530)224-4856	Telephone Interview: Angela has worked frequently with CAF over the past eight years. She attends the PHI, active operations and completion inspections. She has found that over the past two years CAF has made tremendous strides in the use of BMP's in road and crossing management. CAF seems to demonstrate less resistance to the Board Staff recommendations.
Ivan Houser,	Cal Fire,	(530) 257-4171	Telephone interview:
Forester	Lassen-Modoc		Ivan works with CAF on portions of

Unit, Susanville,	the forest covered under the Lassen
CA	Modoc Units responsibility. One of
	main responsibilities is to make
	certain that the THP's correspond to
	the SYP that is approved by the
	State. There has been some
	disconnect between the on-the-
	ground application and the SYP.
	Most of this seems to be due
	different interpretations of the
	forestry staff, and their level of
	understanding and knowledge of the
	SYP. As time progresses they are
	doing a better job of this
	coordination. They have great
	relations with the community and
	their landowner neighbors. Overall
	they are doing a great job of forest
	management.
	management.

In addition to those stakeholders listed above, the members of the FSC Pacific Coast Working Group were contacted, however, no responses were received. A list of the Pacific Coast Work Group members is maintained in the SCS Point Richmond Office.

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

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

Economic Concerns

Comment/Concern	Response
 Logging contractor has to bid for jobs on the 	None required
CAF and has found the evaluation process to	
be fair.	
The contractors interviewed all commented on	None required
the tough market times in the forest industry	
and the high cost of fuel and the importance of	
CAF in their livelihoods.	

Social Concerns

Comment/Concern	Response
• They (CAF)have great relations with the	None required
community and their landowner neighbors	

Environmental Concerns

Comment/Concern	Response
 CAF has the best roads and the best logging of 	None required
any area he has worked in his career	
 Some resistance has occurred to agency 	Contact indicated
recommendations for protection of water	this had improved
quality	over the past few
	years
• CAF has made tremendous strides in the use of	None required
BMP's in road and crossing management	
Some disconnect between the on-the-ground	More staff
application and the SYP. This has been	orientation to SYP
improving.	language may help
Overall they are doing a great job of forest	None required
management	

3.3.6 Other Assessment Techniques (only include if necessary and not needed for single SLIMF)

No additional assessment techniques were employed on this audit.

3.4 Total Time Spent on audit

Pre-audit activities included document review of the management system and review of previous audit reports (1.0 auditor days). Six auditor days were necessary to conduct the field portion of the audit and 1.5 auditor days to write and review the surveillance audit report. Two days were required for the audit team to assemble onsite and return home.

Therefore, a total of 10.5 auditor days were required to complete the 2008 recertification audit.

3.5 Process of Determining Conformance

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

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

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

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

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

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

4.0 RESULTS OF THE EVALUATION

Table 4.1 below, contains the evaluation team's findings as to the strengths and weaknesses of the subject forest management operation relative to the FSC Principles of forest stewardship. The table also presents the corrective action request (car) numbers related to each principle.

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

Principle/Subject Area	Strengths Relative to the Standard	Weaknesses Relative to the Standard	CAR/REC #s
P1: FSC Commitment and Legal Compliance	 CAF has an excellent track record of compliance with federal, state, and local laws. The Collins family has a long and distinguished track record of financial responsibility and philanthropy within the communities where its operations are located. Collins Pine Company has been involved with FSC certification longer than any other large landowner in North America. The website contains a public statement of commitment to managing in accordance with the FSC Principles and Criteria. Senior employees of Collins Pine Company continue to be very active in the development of the Pacific Coast Standard. 	 The SYP does not contain a statement of commitment to the FSC Principles and Criteria. 	• none

P2: Tenure & Use Rights & Responsibilities	 The legal rights of ownership of the CAF are clearly and unquestionably established. Most of the land has been in continuous ownership since 1902. CAF's policy of opening the majority of their lands to the public allows for many customary uses to take place. Stakeholder input is encouraged and acted upon through a number of mechanisms. All comments received are logged and responses made if necessary. CAF staff members are active in the local community and clearly contribute in many positive ways, which helps reduce the likelihood of disputes. CAF management encourages this participation. 	 CAF does have a process in place for permitting users; however, the process is seldom utilized. 	none
P3: Indigenous Peoples' Rights	 CAF has actively engaged members of a nearby rancheria regarding forest management issues. The record of contacts for operations is well documented. CAF foresters have undergone Archeological training and actively record new sites. Archeological site records are maintained and sites are mapped in the GIS system. All records and the mapping detail keep information confidential. 	none	none

P4: Community	■ The company maintains a high quality work	 No weaknesses noted 	none
Relations &	environment for employees and		
Workers' Rights	contractors.		
	 CAF maintains long-term relationships with 		
	its logging and silviculture contractors.		
	Many indicated they only work on CAF		
	lands.		
	Through scholarships, participation in		
	committees, and programs and other civic		
	engagements CAF contributes to public		
	education about forest ecosystems and their		
	management. Training reports and certificates were		
	Training reports and certificates were		
	available. In service training for staff is		
	extensive and encouraged by management.The open door policy of CAF management		
	appears to serve as an effective mechanism		
	for encouraging input.		
	 CAF has a process in place to resolve 		
	issues if they cannot be resolved at the		
	immediate supervisor level.		
	 Donations of land for community projects 		
	has taken place several times over the		
	years.		
	 Several contractors for CAF were 		
	interviewed during the field audit. In all		
	cases the proper certifications, training, and		
	safety equipment were present.		

P5: Benefits from the Forest	 The sawmill's demand for wood does not determine harvest levels on CAF; rather, harvest levels are determined by resource conditions and the continued modeling efforts. The opportunity for utilization of chips and hog fuel for energy has improved the fuels reduction programs. Timber harvest levels are demonstrably below total periodic increment. All field audit stops on past and current operations showed excellent utilization of merchantable material. Single tree and group selection silviculture allows the CAF to meet stocking standards immediately following harvest operations and retain forest cover. 	 The evidence that retention of sufficient levels of snags and down wood is not adequate to assure FSC standards for snag retention are met. Regeneration following selection harvest is predominantly white fir or other more tolerant species, thus changing the forest composition from the historical species mis. 	REC 2008.1
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P6: Environmental Impact

- The SYP includes landscape level planning, and extensive habitat analysis using qualified specialists
- Monitoring for the presence of important species is ongoing through temporary plot surveys and other less formal monitoring techniques. Data can be found in the Sustained Yield Plan.
- California FPR's specify that the alternative with the least environmental impact must be selected. The SYP and THP documents meet the requirements of CEQA.
- Cumulative effects analysis is required for approval of California THP's.
- The opportunity to do biomass projects for chips for the Collins Pine cogeneration plant has helped to reduce fuel loading in forests and remove fuel ladders in treated stands.
- Large-diameter CWD and unmerchantable snags are retained on salvage units according to the CAF fire recovery plan.
- Late-successional stands appear to be well-distributed across the CAF.
- The CAF has an adopted Road Management Plan and a draft Wildlife Management Plan.
- The entire CAF road system will be inventoried by 2010. A major focus of this inventory is to review all stream crossings and bring them up to a standard to accommodate the 100-year flood event. "Design and install new permanent watercourse crossings to accommodate the estimated 100-year return interval flood flow including debris and sediment loads: Any new culvert installations will be sized large enough to accommodate the 100-year flood."

- Additional HCVF considerations need to be made on the CAF. During the audit a potential old growth Type I stand was viewed. No evaluation of this stand for inclusion as an HCV had been completed.
- Treatment of disturbed mineral soil needs to be done on all landings to minimize soil erosion.
- The WLPZ protection zones for some stream categories and slopes used by CAF could allow for new road construction and disturbance of mineral soil in the outer buffer zone.
- While CAF does not provide grazing leases, vegetation monitoring and documentation of grazing effects on sensitive meadows on lands that they own but where the grazing rights are owned by another party should be done.

- REC 2008.1
- CAR 2008.1
- CAR 2008.2

P7: Management Plan	 The CAF is one of only a few forests in California that has a state-approved Sustained Yield Plan (SYP) A large source of the data for future revisions of the SYP comes from the CFI plots and more than 3000 plots to measure wildlife habitat components. The CFI plots are actively being re-inventoried at a rate of 10% per year. CAF foresters are very well trained and competent at writing, obtaining approval, and implementing state-required timber harvest plans. Forest management objectives along with objectives for other resources are clearly stated in the SYP. The CAF has an extensive GIS database from which all of the maps listed in the indicator can be produced. 	 The mapping layer that was found to be lacking in the system was a comprehensive map layer that showed the identified HCVF's on the CAF. The CAF has a public summary of the management plan available to the public upon request; however, it is not posted on the CAF website. A public summary is lacking in the HCV category. 	- CAR 2008.2 - CAR 2008.3
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P8: Monitoring & Assessment	 The SYP provides the general framework of how monitoring information is used in adaptive management and to periodically update the SYP. Implementation of CAF's management plan is periodically monitored through numerous mechanisms, e.g., CFI system, temporary inventory plots, water temperature monitoring, stream channel surveys, and road inventory. The CAF utilizes adaptive management based upon the results of monitoring of various forest attributes. When data from the monitoring demonstrates that management objectives are not being met, then management activities are modified to maintain the attributes. 	■ None noted	■ none
P9: Maintenance of High Conservation Value Forest	 HCVs are identified in the public summary of the management plan for the CAF. On-the-ground observations and THP's that include HCVF areas provide strong evidence of conformance. 	■ There is no unified map or database that includes all types of HCVF identified in the CAF HCVF summary document, making it difficult to verify conformance to the standard.	CAR 2008.2CAR 2008.3

4.2 Preconditions

Not applicable.

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 Collins Pine Company be awarded FSC certification as a "Well-Managed Forest" subject to the corrective action requests stated in Section 5.2. Collins Pine Company has demonstrated that their system of management is capable of ensuring that all of the requirements of the Pacific Coast Standard V. 9.0 are met over the forest area covered by the scope of the evaluation. Collins Pine Company 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 Corrective Action Requests

There were three new minor corrective action requests issued as a result of the 2008 recertification audit.

Auditor Observation/Non-Conformity:

The SCS Team observed that the current practices for the establishment of the WLPZ for Class I (Category A), Class II (Category B and C), and Class III (Category D) streams are to follow the requirements in the FPR of the State of California. These WLPZ requirements vary by slope and stream class. The following table represents these requirements:

	STREAM	CLASS	(CA FPR)
SLOPE	I	II	III
<30%	75	50	25 (ELZ)
30-50%	100	75	50
>50%	150	100	50

The minimum FSC standards from 6.5.p, 6.5.q, and 6.5.r are as follows:

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

Total Buffer 150 100 75 0

Therefore on slopes of 50% or less for Class I and II streams the FSC required minimum buffer on Category A and B streams is larger than the CA FPR WLPZ requirement and new road construction and disturbance of mineral soil might occur within the FSC buffer or mulching and seeding of disturbed mineral soil might not take place. One landing within a Class III WLPZ was observed in the Watertrough THP where mulching and seeding of disturbed mineral soil had not occurred.

CAR 2008.1:

By the time of the 2009 annual audit, CAF must develop a WLPZ (buffer zone) approach to the establishment of the on the ground WLPZ protection that conforms to the FSC standards for inner and outer buffer zones.

Reference: FSC 6.5.h, 6.5.o, 6.5.p, 6.5.q, and 6.5.r

Status at July 10, 2008:

This is a new Minor CAR. This item will be reviewed in the annual audit in 2009.

Auditor Observation/Non-Conformity:

There is no unified document identifying specific types of HCVF's occurring on the CAF, nor the measures to ensure the maintenance and/or enhancement of applicable conservation attributes. Delineation of HCVF's by habitat descriptions and maps is disorganized and incomplete.

CAR 2008.2:

By the time of the 2009 annual audit, CAF must prepare a single unified report that identifies all types of HCVF, describes their habitat types/plant communities(where applicable), summarizes measures to ensure the maintenance and/or enhancement of conservation attributes, and delineates their locations on maps. The summary HCVF document can refer the reader to details in other documents by citation, unless the original documents are not publicly available. In which case, detailed measures must be described in the summary HCVF report.

Reference: FSC 6.3.d.1, 7.1.h, 9.1.a and 9.3.a

Status at July 22, 2008:

This is a new minor CAR and will be reviewed in the 2009 annual audit.

Auditor Observation/Non-Conformity:

The publicly available information on HCVF's and the measures that ensure the maintenance and/or enhancement of the applicable conservation attributes is not adequate. The Public Summary of the Management Plan includes only general categories of HCVF's, such as, Late Seral Types and Their Habitat Elements, Riparian and Wet Meadow Types, and Water-Lake Protection Zones. The measures to ensure maintenance and/or enhancement are also very general ("Appropriate management techniques....") or totally lacking.

CAR 2008.3:

By the time of the 2009 annual audit, CAF must provide information on the specific conservation attributes of the identified HCVF's and the measures to ensure the

maintenance and /or enhancement of the applicable conservation attributes must be specifically included in a publicly available form. The public summary of the management plan or some other publicly available source, such as a specific HCVF Section on the CAF website would be appropriate forms.

Reference: FSC C 7.1.h, 7.4, and 9.3

Status at July 22, 2008:

This is a new minor CAR and will be reviewed in the 2009 annual audit.

There was one new recommendation issued as a result of the 2008 recertification audit.

Auditor Observation/Non-Conformity:

Snag data are unavailable in a format to assess whether CAF is satisfying the FSC snag retention requirements (3 to 10 snags per acre averaged over 10 acres). Large snag recruitment and retention rates may be insufficient to meet habitat requirements of cavity using wildlife.

REC 2008.1:

By the time of the 2009 annual audit, CAF should provide data demonstrating that the FSC snag retention requirement has been met. CAF should review the published literature of snag needs by members of the Snag and Down Wood Guild (see draft Wildlife Management Plan) and provide evidence that snags of adequate size and decay stage are being sustained across the forest.

Reference: FSC 6.3.a.3, 6.3.b.3, and 6.3.e.1

Status at July 22, 2008:

This is a new Recommendation and will be reviewed in the 2009 annual audit.

6.0 SURVEILLANCE EVALUATIONS

If certification is awarded, surveillance evaluations will take place at least annually to monitor the status of any open corrective action requests and review the continued conformance of Collins Pine Company to the Pacific Coast Standarad. Public summaries of surveillance evaluations will be posted separately on the SCS website (www.scscertified.com).

7.0 SUMMARY OF SCS COMPLAINT AND APPEAL INVESTIGATION PROCEDURES

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

A **complaint** is a written expression of dissatisfaction, other than **appeal**, by any person or organization, to a certification body, relating to the activities of staff of the SCS Forest Conservation Program and/or representatives of a company or entity holding either a forest management (FM) or chain-of-custody (CoC)

certificate issued by SCS and duly endorsed by FSC, where a response is expected (ISO/IEC 17011:2004 (E)). The SCS Complaint Investigation Procedure functions as a first-stage mechanism for resolving complaints and avoiding the need to involve FSC.

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

The written Complaint or Appeal must:

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

Written complaints and appeals should be submitted to:

Dr. Robert J. Hrubes Senior Vice-President Scientific Certification Systems 2200 Powell Street, Suite 725 Emeryville, California, USA94608 Email: rhrubes@scscertified.com

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