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

Collins Pennsylvania Forest

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

CERTIFICATION REGISTRATION NUMBER
SCS-FM/COC-00007

Submitted to:

Collins Pennsylvania Forest
Kane Hardwood

Lead Author: Dave Wager

Date of Field Audit: September 7-9, 2005
Date of Report: October 31, 2005
Updated: October 2006 (See section 6.1)
Updated: September 2007 (See section 6.2)

Originally Certified: March 1993

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.scscertified.com) no less than 30 days after issue of the certificate.

FOREWORD

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by Collins Pine Company to conduct a certification evaluation of its Pennsylvania forestlands. 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 September 2005, 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 re-award FSC-endorsed certification to Collins Pine Company, for the management of its Collins Pennsylvania Forest (CPF). Scientific Certification Systems will post this public summary of this report on its web site (www.scscertified.com).

SECTION A- PUBLIC SUMMARY AND BACKGROUND INFORMATION
1.0 GENERAL INFORMATION

1.1 FSC Data Request

Applicant entity	Collins Pennsylvania Forest
Contact person	Blaine Puller
Address	PO Box 807 Kane, PA 16735
Telephone	814-837-6941
Fax	814-837-8401
E-mail	bpuller@collinsco.com
Certificate Type	Single FMU
SLIMF *if applicable*	NA
Group Members *if applicable*	NA
Number of FMU's *if applicable*	1
Number of FMUs in scope that are	0
less than 100 ha in area	0
100 - 1000 ha in area	0
1000 - 10 000 ha in area	0
more than 10 000 ha in area	1
Location of certified forest area	Kane, Pennsylvania
Forest zone	Temperate
Total forest area in scope of certificate which is included in FMUs that:	0
are less than 100 ha in area	0
are between 100 ha and 1000 ha in area	0
meet the eligibility criteria as *low intensity* SLIMF FMUs	0
Total forest area in scope of certificate which is:	
privately managed[1]	126,000 acres
state managed	0
Community managed[2]	0
Number of forest workers (including contractors) working in forest within scope of certificate	42
Area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	9,303
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'	7,000
List of high conservation values present[3]	HCV 3-Forests that are in or contain rare, threatened, or endangered ecosystems HCV 4-Forest areas that provide basic services of nature in critical situations.

[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

Chemical pesticides used	Accord, oust, arsenal
Total area of production forest (i.e. forest from which timber may be harvested)	116,697
Area of production forest classified as 'plantation' for the purpose of calculating the Annual Accreditation Fee (AAF)	0
Area of production forest regenerated primarily by replanting[4]	Less than 2%
Area of production forest regenerated primarily by natural regeneration	>98%
List of main commercial timber and non-timber species included in scope of certificate (botanical name and common trade name)	northern red oak, white oak, black oak, chestnut oak, pin oak, yellow poplar, black cherry, pin cherry, sugar maple, red maple, white ash, American beech, hickory, black gum, sweet gum, white pine, tulip poplar, cucumber tree, aspen, basswood, hemlock,
Approximate annual allowable cut (AAC) of commercial timber	9.052MM Bd. Ft.
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.)	Pulp wood, saw and veneer logs.

1.2 Management Context

As a forest management entity in the Commonwealth of Pennsylvania, CPF is subject to an array of local, state and federal guidelines and regulations. At the federal level, the principal regulations of greatest relevance to forest managers in the Commonwealth include the following statutes:

- Endangered Species Act
- Clean Water Act
- Forest Resources Conservation and Shortage Relief Act
- National Resource Protection Act
- National Environmental Protection Act
- National Wild and Scenic River Act
- Occupational Safety and Health Act of 1970
- Archeological and Historic Preservation Act
- National Historic Preservation Act

[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.

- Native American Grave Protection and Repatriation Act
- Land and Water Conservation Fund Act of 1965
- Americans with Disabilities Act
- Rehabilitation Act
- Architectural Barriers Act
- U.S. ratified treaties, including Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and International Labour Organization (ILO)

1.2.1 Environmental Context

Pennsylvania is heavily forested, especially on lands lying north of Interstate 80. Most of CPF lies within a larger matrix of fairly contiguous forest lands that receives varying degrees of fragmentation by agricultural lands, oil and gas wellhead sites, major riverine systems, and local roads. Generally, in areas subject to fragmentation, wooded lands lie on the ridge tops and slopes. According the CPF management plan: "The (126,042) acres of the CPF consists of 187 individual tracts in seven counties of NW Pennsylvania. Adjacent lands are dominated by public ownerships such as the Allegheny National Forest which comprises 525,000 acres in Warren, Forest, McKean and Elk counties. Other extensive public holdings include State Forest Lands in Potter, Cameron and Elk counties. Tracts of State Gamelands are present in all seven counties. All of these public ownerships are managed for multiple uses. All State Forest lands are FSC certified. Other public ownerships in the area include some small State Parks, some municipal watersheds and US Army Corps of Engineers controlled lands associated with major flood control projects. Almost all of the public land in the region is forested.

Private land in the region includes many small non-industrial ownerships. Most of this land is also forested with some agricultural lands in eastern McKean, northern Potter and northern Warren counties. Some of this NIPF ownership is managed for timber production. There are many private forestry consultants serving the NIPF owners in the region. Industrial forestland ownership in the region is dominated by Forest Investment Associates, Seneca Resources Corp., RAM Forest Products, Forest Land Group, and Industrial Timber and Land. The CPF forestry staff maintains good relationships with all of the major landowners and forestry consultants as well as many of the NIPF owners in the region. Right of way agreements and road maintenance arrangements allow for efficient management and cooperation among adjacent ownerships."

The Collins Pennsylvania Forest (CPF) operates in a region where high deer populations have profoundly modified both managed and unmanaged forest communities over the past 70 years. Overabundant deer have, through selective feeding, altered this region's forest structural diversity; shifted species' dominance and equitability; reduced, altered, or eliminated advanced forest regeneration; and eliminated or reduced other wildlife species as a result of competition or habitat alteration.

In response, forest managers within the region, including Kane Hardwood, have developed and used a variety of modified harvest patterns and silvicultural practices in an attempt to

meet the challenge of deer impacts. The evaluation team credits the Kane Hardwood staff for a number of initiatives to attempt to deal with this problem, not the least of which has been a tenacious lobbying of the Pennsylvania Game Commission (PGC) to modify its deer management program to be scientifically valid and ecologically sound.

In July 2003 a severe weather event caused widespread damage on the CPF including uprooting and crown damage. In total 27,755 acres were affected, with about 85% experiencing light blowdown, 13% moderate blowdown, and 3% severe blowdown. From the time of the event up through August of 2005 salvage comprised most of the harvesting on CPF

1.2.2 Socioeconomic Context

Pennsylvania's Rural Economy: An Analysis of Recent Trends (Penn State Center for Economic and Community Development- http://cecd.aers.psu.edu/) reports that Pennsylvania's economy, like the entire U.S., performed well during the decade between 1990 and 2000, adding 600,000jobs, a 10 percent increase. Also, like the entire U.S., Pennsylvania's economy retracted beginning in 2001. Due to off-shore manufacturing and technological improvements in productivity during the economic expansion of the 1990's, traditional sectors (e.g., manufacturing) continued to decline while the service- and technology-based sectors expanded. Despite this shift in the rural economy from a manufacturing-based to a service-based economy, the forest product industry still plays an important role in the Pennsylvania rural economy. Arguably the socioeconomic importance of forest-related jobs is strengthened because of the decreasing number of other non-service type jobs.

According to 1999 Department of Labor statistics the timber and forest products industry is the fourth-largest manufacturing industry in the state, employing nearly 100,000 workers in 2,500 firms, and contributing almost 5 billion dollars annually to the state's economy.

1.3 Forest Management Enterprise

1.3.1 Land Use

Land use in addition to forest management includes: cell tower leases, right of ways, and oil and gas leases. According to the CPF Management Plan: "Under Pennsylvania real estate law, subsurface oil, natural gas, and mineral ownership is legally recognized as separate estates which are independent and separable from the surface estate. The Trust and Family component of the CPF include almost all of the subsurface rights for the parcels involved. Only about seven percent of the subsurface rights on Company lands are in the possession of the CPC. Because subsurface ownerships were separated from the surface ownership by the original owners, most deeds give subsurface owners the right to utilize the surface as necessary to extract the oil, natural gas, or minerals.

The forestry department tries to work with subsurface owners planning to develop their

OGM rights in order to minimize negative impacts of the development. Once notification of a proposed development and proof of ownership is received, the forestry staff works cooperatively toward an arrangement that will benefit both parties and cause the least amount of impact. Proper location of roads, pipelines, electric lines, etc. will minimize future conflicts with timber management. OGM owners usually bear the entire cost of roads, culverts, gates, etc. which will be available for joint use in the future."

Additionally, all of CPF lands are open to hunting through an agreement with the Pennsylvania Game Commission.

1.3.2 Land Outside Scope of Certification

All of the CPF lands in Pennsylvania are included within the scope of the certificate.

1.4 Management Plan

1.4.1 Management Objectives

As described in the CPF Management plan "Collins Pine Company timberlands in Pennsylvania are being managed under a sustained yield management program that uses proper forest management to provide high value timber products and to improve the existing timberland holdings.

Our management directives are to:

1. Provide a sustainable yield of high quality forest products in a dependable and predictable manner.
2. Move the forest to a balanced age class distribution over time.
3. Identify the site productivity, and then maintain or enhance it.
4. Recover mortality where it is practical and will not adversely impact the ecological integrity of the site.
5. Provide economic benefits to the owners, the Company and the persons involved directly and indirectly with the ownership and operations of the Kane Hardwood Division

The three combined ownerships are made up of 187 non-contiguous parcels of land in seven counties. For Forest management purposes, these parcels are managed as one unit with one set of biological goals.

The biological goals are:

1. Maintain productivity of the forest in all aspects.
2. Maintain and improve timber quality and production for maximum sustainable yield.
3. Maintain diverse ecological systems of this forest compatible with the production of the primary commodity – timber.
4. Protect water quality on the timberlands.
5. Enhance wildlife habitat.
6. Maintain biodiversity"

1.4.2 Forest Composition

Landscapes across CPF represent a full range of successional stages, including even-aged early succession, sapling, and second-growth stands. The majority of CPF forest is even-aged sawtimber size stands. Important wildlife habitat components include standing and down coarse woody debris (snags and logs), conifers, rock ledges and assemblages, and vernal ponds. The following timber types occur on CPF:

- Northern Oak: Predominantly Northern Red or White Oak, occasionally including minor amounts of Black, Chestnut or Pin Oak on drier sites.
- Northern Hardwoods: Predominantly mixtures of Sugar Maple and American Beech with minor amounts of Sweet Birch, Red Maple, White Ash, and Basswood.
- Allegheny Hardwoods: Predominantly Black Cherry, White Ash and Tulip Poplar comprise the majority of stocking with varying amounts of Sugar Maple and Red Maple present.
- Pioneer Species: Primarily of Aspen, Birch and Hawthorne in nearly pure or mixed stands.
- Hemlock-Pine: Hemlock and White Pine making up the majority of the stocking.

1.4.3 Silvicultural Systems

According to the CPF Management Plan: "The silvicultural strategies employed on the CPF are influenced by the even age structure and species composition currently existing in our forest stands. They are designed to meet our strategic objectives and biological goals. Most of our stands originated from the clear-cutting of the original forest in the late 1800's and early 1900's. They are composed primarily of even age stands of intolerant and moderately tolerant hardwoods. Many of these stands are at or approaching maturity.

Our strategy is to regulate our forest by regenerating the older stands, the less healthy stands and the stands threatened with the loss of seed sources. This will consist of stimulating the development of a new age class of healthy, diverse, advanced regeneration which will grow freely after harvesting the overstory.

Harvesting generally focuses on two components of the stands. First and foremost is natural regeneration. Research has shown that natural regeneration must be present in sufficient quantities prior to the removal of the overstory seed source trees for the stand to regenerate successfully. Guidelines for advanced regeneration stocking have been developed by the USFS NEFES Forestry Sciences Lab at Warren, PA. These guidelines as well as other research are used to evaluate regeneration before any harvesting is planned."

1.4.4 Management Systems

The CPF Management Plan states "The Collins PA Forest is comprised of three ownership groups of various individual tracts. These include Trust Lands totaling 23,034 acres, Family

lands totaling 3,222 acres, and Company lands totaling 99,768 acres. The individual tracts are scattered over seven counties in northern Pennsylvania and vary in size from 13 acres to 13,000 acres."
All forestry staff, with the exception of V.P of Collins Resources, are based out of the offices in Kane, Pennsylvania. The vice president of Collins Resources, reporting to the company president, oversees all activities on all forestland owned by the Collins Companies and regularly visits each forest location to monitor progress. CPF staff include: Forest Manager, Silvicultural Manager, Harvest Manager, Harvest Supervisor, Procurement Forester, two Regional Foresters, Field Forester, and a GIS Forester.

1.4.5 Monitoring System

All areas receiving silvicultural treatments are mapped using a global positioning system. This information is used to update the GIS database. The GIS database is used to keep track of shelterwood and herbicide treatments so that regeneration development can be monitored by field data collection. This data assists in the planning of regeneration harvests.

Regeneration harvests are also tracked on the GIS database. Regeneration stocking data is collected on these stands during the second growing season after the regeneration harvest. Stands well stocked with regeneration are re-measured every two years until the stands enter the sapling ("e" size class) stage when they are considered established stands.

The GIS is also used to track non-timber related resources: roads, reserves, watercourses, oil and gas wells, and numerous other aspects.

1.4.6 Estimate of Maximum Sustainable Yield

In modeling the forest, the CPF was divided into company and trust management units, due to the difference in fiscal accountability and structure of the timber resource. The allowable cut 6.75 MMBF on Company lands 2.3 MMBF on Trust land. According the CPF Management Plan, " A statistically accurate, comprehensive forest inventory was obtained from a stratified cruise based on timber typing derived from aerial photographs of the ownership. Information including species, volumes, basal area, and trees per acre was incorporated into a database. The productive land-base was limited to only the three major timber types on the CPF of Allegheny Hardwood, Northern Hardwood, and Oak. Also excluded was that acreage in zones where timber management (in these types) is not allowed by self-imposed rules. Approximately (92%) of the total land-base was determined to be productive forestland from which the allowable harvest was calculated.

The FORMAINE Wood Supply model was selected to plan the sustainable harvest. Operating on user-defined variables, it models the effects of time and management on the forest. There are essentially three main inputs. The first is the forest condition classes. In the three cover types to be managed for timber, 72 distinct forest condition classes were identified. These were developed with the average age of stands, treatment history, desired future condition, stand density, and size being considered. These condition classes are related to the timber types and were assigned appropriate acreages. Yield curves for the

model were obtained from the Allegheny National Forest for the Allegheny Hardwood type and the Northern Hardwood type. An Appalachian region curve for oak was used because it matched the CPF very well. These curves were used as base curves for each of the three managed cover types. Each yield curve is a set of five individual curves. Of these five, data was supplied for the following three: Curve one, the growth curve; curve three, the sawlog % curve; and curve five, the harvest priority curve. The remaining two curves, for planting and thinning, are for practices that are not used extensively on the CPF. Derivations of the 72 forest condition classes, led to the development of 30 separate yield curve sets to model the CPF. To improve accuracy, the curves were calibrated to the inventory. All of the forest condition classes and their associated acreages were assigned to the appropriate curves. This allowed comparisons of inventory data for a given age group with what the curve was reporting. It also provided a comparison of total inventory from the cruise and a total inventory reported from the model. Using these comparisons, the curves were adjusted so that the values matched more closely. These steps were also done for the sawlog curve in each set. The scaling factors (reported as a percentage) that were used for the base curve in each of the main cover types are as follows:

	Company	Trust
Scaling Factors As A Percentage Of Base Curve		
Oak	97	90
N. Hdwd.	117	117
A. Hdwd.	126	134
Sawlog Percentage Of Total Cubic Foot Volume		
Oak Logs	50	55
N. Hdwd. Logs	42	50
A. Hdwd. Logs	39	44

The fifth curve in each set was developed to prioritize the harvest of one forest class over another. This allowed minimum harvest ages and target rotation ages to be set, as well as to allocate the harvest proportionally among cover types. Because the rotation age for a classification of timber is different from type and site, ranges were set to reflect this. For oak, the range is from 90 years to 110. For Northern Hardwood, it is from 90 to 120, and for Allegheny Hardwood, it is from 80 to 110. To balance age classes some stands will be carried well past the desired range.

1.4.7 Estimated, Current and Projected Production

From July 2003 to present, the actual harvest has exceeded the 9 MMBF allowable because of the active salvage operations in response to the windstorm. Prior to the windstorm event, actual harvest levels were below the allowable harvest. Thus, the allowable harvest for a 10-year period has not been exceeded. CPF is now in the process of re-calculating the allowable harvest using the same methodology as described in section 1.4.6

1.4.8 Chemical Pesticide Use

Because of long history of intense deer browsing, competing vegetation including hay scented fern and striped maple out-compete the desired forest regeneration species. Herbicides are used, when no other alternatives exist, to remove the competing vegetation and allow regeneration of desired tree species. Herbicide use is restricted to only one application in the rotation of a stand. Herbicides used include Oust, Accord, and Arsenal. No FSC prohibited chemicals are used.

2.0 GUIDELINES/STANDARDS EMPLOYED

As the applicant forest property is located in Pennsylvania, the certification evaluation that is the subject of this report was conducted against the duly-endorsed FSC Appalachian Standard (version 4.0). 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

Certification Audit: September 7-9

3.2 Assessment Team

Dave Wager, Team Leader:

Mr. Wager is Director of Forest Management Certification for SCS. During his 4 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 preliminary assessment of Wisconsin County Forests, State of PA Bureau of Forestry, State of Massachusetts, Perak ITC- Malaysia, and Collins Lakeview Forest. 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 reduction in Utah's Central Wasatch Mountains.

Michael Keyes (Ph.D): Ecologist
Dr. Keyes is the Senior Forestry Auditor of Scientific Certification Systems. He is a professional forester and forest ecologist with 23 years of professional experience in both public and private forest management issues. Dr. Keyes worked in collaboration with the World Bank's environmental programs in forestry and agroforestry. He works in SCS as a Senior Forestry Auditor and experienced in auditing State-run forestry programs under the

FSC guidelines. Dr. Keyes is also key member in SCS's developing sustainable agricultural and agroforestry programs. He has professional work experience in Indonesia, Malaysia, Colombia, Costa Rica, El Salvador, Guatemala, and México.

Daniel Stepanauskas: Forester
Mr. Stepanauskas is a New Hampshire licensed professional forester with 25 years of experience. He has been engaged in FSC assessments for six years. He holds a Bachelor of Science degree in Forestry from the University of New Hampshire, and has led numerous certification evaluations for FSC throughout the eastern and mid-western United States, and Canada.

3.3 Assessment Process

3.3.1 Itinerary

Wednesday September 7, 2005
8:00 a.m. Opening Meeting

The Opening Meeting was held at the offices of Collins Kane at the Kane Division in Kane, PA. Attendance at the Opening Meeting included the Collins Kane foresters, Collins Kane senior staff and FSC Audit Team.

Blaine Puller – Forest Manager
Connie Grenz - General Mgr.
Ned Karger - Silvicultural Manager
Dan Witherell - Regional Forester (East)
Brian Parana - Regional Forester (West)
Tom Kase - Field Forester
Dave Trimpey - Harvest Manager
John Williams - Harvest Supervisor
James Snyder - Procurement Forester
Mike Hancharick - GIS Forester

9 to 11:30 Office Review of documentary information, GIS systems, document solicitation, and stakeholder interviews (Collins Kane staff).

11:30 to 5 p.m. Field sites (detailed below)

Forest 16 (Block 52)

- FSC Indicators 6.5f-t. related to streamside management zones; calculation of canopy reduction and buffer strips
- Use of temporary stream crossings and materials, such as straw for silt mitigation and PA Permit # 8.
- Mark to cut guidelines and Collins Kane's SOPs; discussion of the FSC Appalachia

Standard
- Skid trail designation and special management areas
- Forest health and economic returns; residual stand damage following logging
- Contracts for appropriate equipment in environmentally sensitive areas ; the use of Bell 3-wheelers

Forest 16 (without Block assignment #)

- Transportation systems; inventories for maintenance, permanent stream crossings, PA stream classification systems
- New road design concerns, contract issues (Fox and Sons contract example); specific measures for gas lines, wetlands, unauthorized public access, and cooperative road use with US forest Service
- FSC Criteria 6.4; representative forest ecosystems and non-forest areas on the Kane Forest, landscape assessments, maintenance of poorly representative ecosystems

Forest 16 (Howe Township)

- First step of shelterwood with advanced regeneration; use of tree tops to impede deer browse of cheery
- Harvest stand selection process; aggregating harvesting units to do mitigate deer browse

Trust 7 (without Block assignment #)

- BA guidance for Collins Kane Silvicultural treatments; overstory removal, and long term leave tree, and oak shelterwood regeneration
- Herbicide use; ground applications only, equipment selection and limitations, chemical mixing and disposal methods used by licensed sprayers
- Collins Kane hardwood marking system; seed trees, reserve tree policy, logistics for residual removal and care of damaged trees
- Long-term retention goals; good mast producers, 10-14 inch dbh targets, den trees, unique and rare species targeted
- Discussion of FSC expectations regarding HCV forests; landscape assessments, treatments to maintain

Evening SCS Audit Team

- Document discussion
- Initial scoring

Thursday September 8, 2005

Allegheny National Forest

- Comparative successional sequences comparing CPF with N.F. stands following logging and reforestation efforts; arrested succession, fern invasions, sugar maple mortality (from acid rain), elm span worm damage

McKean 27 (without Block assignment #)

- Oil leases and impacts on forest mgt.; continuance of leasing, contaminations, cooperative road design, construction and maintenance
- Stakeholder consultation with Tidewater Oil Company subcontractor
- Herbicide applications; prescriptions for Striped Maple and other non-commercial species, FSC Criteria 6.6 and 6.7
- Harvesting effects on soil compaction, stand structure and species composition; use of frozen winter ground to protect soil resources
- Management objectives; forest health triggers, wind damage, rot and marketing of downed woody materials

McKean 27 (without Block assignment #)

- Residual trees; marking guidelines, species diversity (Red Maple, forest health, den trees, rare species, clumping when possible)
- Thinning use and limitations; problems with competing vegetation, need for balancing age-groups across CPF landscapes, stand damage problems
- Contractors; logging contract specifications, equipment maintenance, logger training (all SFI trained), and local or regional preferences given to promote stable business relationships

McKean 27 (Block 50)

- Road construction and maintenance; protection zones and PA state requirements, inventory of roads, Kane crews and company-wide expectations
- Riparian zones and water crossings; culvert replacements, E. V. streams and needs for permitting; FSC Indicators 6.5 q and 6.5 h
- Mark to leave guidelines; Collin's CPF staff experiences with marking, shelterwood successes detailed to the SCS auditors

McKean 27 (Blocks 1 and 2)

- Acceptable vs. unacceptable residual stand damage; discussion regarding FSC Criteria 6.5 and

Trust 7 (Blocks 97)

- Phyto-sanitary salvage; blowdown frequencies on Allegany Plateau, wind effects on forest planning and Silvicultural prescriptions
- Use of adaptive mgt. techniques in salvage; equipment selection, harvest timing to optimize benefits to forest and minimize soil compaction and/or economic losses
- Skid road design and SOP for road closures

Trust 7 (without Block #)

- Permanent and rotational forest reserves; active vs. passive mgt., use of machine logging, connectivity and planning for rare species and wildlife migration
- Prescribed fire effects; costs, ecological benefits, surrogate treatments that mimic fires
- Streamside buffers; FSC requirements – equipment use in travel lanes, buffer width and canopy closure estimation

Warren 20 (Block 19)

- Northern hardwood first stage shelterwood harvest in progress
- Ample buffers along both permanent and ephemeral streams
- Good distribution of coarse woody debris

Warren 20 (Block 18)

- Marked shelterwood harvest
- Dying beech was successfully treated with Accord, buffers were left along permanent stream courses
- Dying overstory beech (beech bark disease complex) was a factor in choosing site to initiate a shelterwood treatment. Accord was used before harvesting to control thick beech root suckers as well as hay scented fern. This should result in establishment of desirable natural regeneration.

Warren 17 (Block 1)

- Marked oak shelterwood
- Road re-building recently completed
- Herbicide prescribed to treat striped maple

Warren 16 Glade Twp

- Excellent oak and mixed hardwood regeneration in a shelterwood red oak stand
- Viewed 28 acre permanent reserve area Gardner Rocks, a geological remnant, thought to provide habitat for bats
- Small sawtimber oak stands are being retained to maintain the proportions of under-represented age classes

Evening SCS Audit Team

- Scoring session

Friday September 9, 2005

- Scoring session (continued)
- Information requests and clarifications
- Exit Interview with Collins Kane forestry staff members

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

See discussion in section 3.3.1

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 (not needed for single SLIMF)

See discussion in section 3.3.1

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 CPF management, 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 prior SCS work conducted in Pennsylvania and lists of stakeholders from CPF. The following types of groups and individuals were determined to be principal stakeholders:

- CPF employees, including headquarters and field
- contractors
- adjacent property owners
- Members of the Appalachia FSC Working Group/National Initiative
- Local and regionally-based environmental organizations and conservationists
- Forest industry groups and organizations
- Purchasers of logs harvested on CPF
- Local, State and Federal regulatory agency personnel
- Other relevant groups

The evaluation team contacted individuals and organizations within each of these stakeholder groups. In total 10 groups/individuals commented on Collins Pennsylvania, either via letters,

phone calls, or in-person interviews (see section 3.3.5.1 for a summary of their comments). A total of 30 groups/individuals were sent, via email or regular mail, a public notice describing the upcoming evaluation, and were offered opportunities to solicit comments (Names of individual/groups contacted is maintained in SCS offices). Additionally, several stakeholders were contacted via phone during the assessment, but did not return phone calls. Names of groups and individuals that commented, as well as those who were contacted but did not respond, are maintained in the SCS offices.

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

Stakeholders provided, without exception, very favorable remarks about CPF. Not a single negative comment about CPF's management was received, which is very unusual for an FSC assessment. The stakeholder consultation further confirmed SCS findings during this assessment (as well as the previous 9 assessments) that CPF conducts its business and forestry in an exemplary manner.

A summary of the perspectives expressed by the stakeholders that were consulted during the course of this evaluation include:

Environmental Considerations

Comment/Concern	Response
• Excellent cooperation on various ecological research projects (e.g., Kinzua Quality Deer Cooperative)	Noted
• Forestry staff demonstrate concern and implement safeguards for rare flora and fauna	Noted
• CPF Should be commended for their ability to find other solutions than fencing to achieve desired regeneration	Noted

Community Groups & Local Residents, Including Indigenous Peoples

Comment/Concern	Response
• CPF's policy of opening their forest to public access is a notable benefit to the community	Noted
• CPF cooperates well with adjacent landowners and actively cooperates with many different organizations and participates on various committees	Noted

Governmental Organizations

Comment/Concern	Response
• CPF is a first-rate company and they wish that there were more land managers like Collins in Pennsylvania	Noted
• The fact that CPF is managing for the long-term really shows in their management and in their cooperation with government	Noted

organizations	

Employees and Contractors:

Comment/Concern	Response
• Employees and contractors interviewed felt that CPF was an excellent company to work for, that compares very favorably to other organizations/operations.	Noted

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

No other techniques were used in this assessment

3.4 Total Time Spent on audit

A total of approximately 22 person days were spent on the evaluation including time spent on preparatory work, time spent auditing documents and records, interviewing stakeholders, and carrying out field work, but excluding travel to and from the region in which the certified forest is located.

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	▪ CPF has an excellent track record of compliance with laws in PA. ▪ The Collins family has a long and distinguished track record of financial responsibility and philanthropy within the communities where its operations are located ▪ CPF foresters take actions to protect forest from illegal ATV use, such as blocking trails with trees and other barriers. ▪ There are no significant problems with timber theft or illegal settlement ▪ Collins has been involved with FSC certification longer than any other large landowner in North America.	▪ Forest is well roaded and open to the public, thus increasing opportunities for illegal activities	▪ **None**
P2: Tenure & Use Rights & Responsibilities	▪ The legal rights of ownership of the CPF are clearly and unquestionably established, parts of the CPF have been managed for 150 year ▪ CPF's open lands policy allows many customary uses. ▪ CPF uses pro-active approaches to avoid potential disputes, e.g., discussing boundary lines with adjacent landowners prior to initiating activity.	▪ none noted	▪ None

P3: Indigenous Peoples' Rights	▪ CPF forester actively solicited archeological specialists when encountering potential arch sites	▪ CPF has not explicitly solicited input from Tribes on identification and protection of cultural and archeological resources (Minor CAR 2005.1)	CAR 2005.1
P4: Community Relations & Workers' Rights	▪ Observations and interviews demonstrated that CPF maintains a high quality work environment for employees and contractors ▪ Through community outreach, tours, and civic engagement CPF contributes significantly to public education about forest ecosystems and their management ▪ CPF has developed and implemented safety programs and procedures ▪ CPF requires their contractors to be SFI certified loggers ▪ Through CPF's community participation there are numerous opportunities for people, as individuals and/or groups, to offer feedback/input regarding forest operations. ▪ The "good neighbor" philosophy of Collins Pine Company and CPF is very helpful in avoiding grievances	▪ There is room for improvement at enforcing safety requirements (e.g., wearing hard hats) that are specified in contracts. ▪ CPF lacks a formal process for soliciting and incorporating input regarding management planning (Indicator 4.4.b) (CAR 2005.2) ▪	CAR 2005.2 Rec 2005.1 Rec 2005.2

P5: Benefits from the Forest	▪ The Collins family has a strong record of financial viability and investment in its operations, as demonstrated by its 150 year record of successful forestry (beginning in 1855 with milling and forestry operations on CPF) ▪ CPF invests in regeneration monitoring and necessary treatments, i.e, competing vegetation control and fencing, at a level beyond many forest managers in PA, and at a level that is needed considering the regeneration problems. ▪ Over 90% of logs coming from company lands are processed regionally ▪ Residual stand damage levels are impressively low ▪ CPF harvests and markets a diversity of sawlog and veneer species (black cherry, northern red oak, sugar maple, red maple, ash, beech, and other species) ▪ The open forest policy for recreation helps strengthen the regional economy, e.g., tourism, hunting, horse riding, snowmobiles, and other activities ▪ Harvest levels on the CPF are based on good data and follow below periodic growth levels	▪ No weaknesses noted	None

P6: Environmental Impact	▪ CPF is cognizant of and incorporates landscape-level considerations such as seral stage distribution across the ownership. CPF also makes effort to maintain connectivity through Wildlife Habitats and Ecological Reserves (WHER) ▪ CPF was given access to the Natural Heritage Database, demonstrating CPF's commitment to protect rare, threatened, and endangered species, as well as the very positive working relationship with Natural Heritage Database personnel. ▪ Natural regeneration is the near exclusive method for regenerating CPF forests ▪ Aggregation of timber sales is used to minimize deer browse damage ▪ Three types of reserves are identified: permanent, rotational and modified management. ▪ CPF protects features that are sensitive, rare, or unique in the landscape. ▪ Road reconstruction was well done with both drainage considerations and minimal road widths witnessed ▪ CPF has moved to mechanical thinning of competing vegetation down to 1"- thus greatly reducing the need for herbicides ▪ CPF works collaboratively with oil and gas well lessees to avoid spills, line breaks, and other environmental problems associated with oil and gas wells ▪	▪ Obtaining more detailed information on habitat requirements of R,T,&E species could strengthen conformance ▪ Retention of "long term residuals" in regeneration harvests (2nd stage shelterwood), experienced considerable blowdown. There may be an opportunity to improve longevity of retention through clumping and species selection. ▪ CPF yet to initiate a control program for invasive exotic species as they are waiting for the State to release a statewide plan prioritizing which species should be treated (CAR 2005.3)	▪ CAR 2005.3

P7: Management Plan	▪ Per the requirements of P&C 7.1, the management plan and supporting documents provide, management objectives, description of the forest resources to be managed, and other specified requirements ▪ CPF has a first-rate GIS, and a very knowledgeable forester assigned to maximize utility of the GIS ▪ CPF has produced a stand alone public summary version of their management plan that meets FSC requirements	▪ The management planning documents lack a description of the socio-economic conditions and public consultation ▪ There is room for improvement in training on the identification of rare, threatened, and endangered species and their habitats (Rec 2005.3)	▪ None Rec 2005.3
P8: Monitoring & Assessment	▪ Margin of error for timber inventory monitoring procedures is extremely low as validated by an independent assessment ▪ CPF is a key partner in one of the most extensive deer impact regeneration monitoring studies in the country- Kinzua Quality Deer Cooperative (KQDC). ▪ Regeneration after treatments are tracked and monitored every 2 years until sapling stage. Information is tracked in GIS ▪ CPF has a formal and structured protocol for monitoring roads and undertaking road maintenance ▪	▪ Current monitoring system falls short with respect to monitoring observed changes in flora and fauna- particularly habitat elements and plant communities (8.2.c) ▪ A public summary of the results of monitoring efforts is not available.	CAR 2005.4

P9: Maintenance of High Conservation Value Forest	▪ CPF's has identified and protected HCVF through its Wildlife Habitat and Ecological Reserves system (see description under 6.4). ▪ CPF maintains or enhances the high conservation attributes of its permanent reserves primarily through a hands-off approach, which is described in the management plan ▪ CPF enhances the values of its HCVF as well as that on adjacent properties through establishment of corridors.	▪ CPF has not made an explicit effort to consult with outside stakeholders on whether or not the areas currently identified on CFP cover all candidate HCVF.	**CAR 2005.5**

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 CPF 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 CPF be re-awarded FSC certification as a "Well-Managed Forest" subject to the corrective action requests stated in Section 5.2. CPF has demonstrated that their system of management is capable of ensuring that all of the requirements of the Appalachian Standard are met over the forest area covered by the scope of the evaluation. CPF 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: CPF has not explicitly invited participation of American Indian groups that may be interested in protecting cultural and archeological resources on the CPF	
CAR 2005.1	By the 2006 annual audit, CPF needs to: 1. Through consultations with relevant Tribes, list is available from PA Historical Commission; determine if any Tribes are interested in being consulted on forest management activities that occur on CPF lands. 2. If, Tribes are interested, CPF must develop consultative mechanisms and initiate consultation with relevant Tribes about protection of archeological and cultural resources. 3. Develop and implement a Standard Operating Procedure or equivalent document that details consultation mechanisms and subsequent safeguards to protect identified resources.
Deadline	By the 2006 surveillance audit
Reference	FSC Criterion 3.2, 3.3

Background/Justification: CPF lacks of a formal process for partners and the general public to comment on CPF management and for CPF to incorporate this input into its planning.

Although it is clear that this already happens on an informal basis, FSC requires a slightly more formal and documented process.	
CAR 2005.2:	By the 2006 annual audit CPF will have developed and implemented formal mechanisms for assessing and recording social impact of their management activities, for example a log of key comments received and any responses actions taken.
Deadline	By the 2006 annual audit
Reference	*FSC Criterion 4.4*

Background/Justification: Although CPF is monitoring and recording invasive exotic plant occurrences, they have yet to develop an action plan to control them	
CAR 2005.3	Once the Statewide plan for prioritizing invasive exotic plant treatments is complete, CPF shall implement a specific invasive control and treatment plan for invasive plants on the CPF
Deadline	6 months following completion of Pennsylvania's statewide management strategy for invasive exotics
Reference	*FSC Criterion 6.9*

Background/Justification: There is no public summary of monitoring results	
CAR 2005.4	Within 12 months after finalization of the 2005 recertification report, CPF must develop a procedure and capacity to provide a timely response to any express request from an interested party seeking a public summary of the results of periodic monitoring, per FSC Criterion 8.5. The company's response to a request for a public summary of monitoring results should, while respecting CPF's confidentiality, address basic monitoring activities, including those enumerated in FSC Criterion 8.2: • Yield of forest products harvested • Growth rates, regeneration and conditions of the forest • Composition and observed changes in flora and fauna • Environmental and social impacts of harvesting and other operations
Deadline	By the 2006 Annual Audit
Reference	*FSC Criterion 8.5*

Background/Justification: CPF has yet to undertake a consultation process regarding identification of HCVF.	
CAR 2005.5	By the 2006 annual audit, CPF must initiate focused consultation with select stakeholders (such as Allegheny National Forest Service biologists or other area wildlife biologists, Natural Heritage staff, interested faculty members at State College, among other specialists) seeking their input on defining and identifying HCVF, and building upon current CPF Reserve systems.

Deadline	2006 annual audit
Reference	*For Example: FSC Criterion 9.2*

6.0 SURVEILLANCE EVALUATIONS

6.1 2006 Annual Audit

6.1.1 Assessment Dates

This is the first annual audit of Collins-Kane since the October 2005 recertification audit.

October 19, 2006

- 8:45-10:45- Interview with the forestry staff.
- 11:00-4:00- Field site visits.
- 4:00- 4:45- Data and document collection.

October 20, 2006

- 8:45-9:30- Audit summation with forestry staff along with Connie Grenz, General Manager.

6.1.2 Assessment Personnel

Mr. Daniel Stepanauskas :

Daniel A. Stepanauskas conducted the audit. Mr. Stepanauskas is the Northeast Representative for Scientific Certification Systems Forest Management Program. Mr. Stepanauskas has been a practicing forester for twenty-six years, and is a consultant with over six years of extensive experience in forest certification and chain-of-custody auditing. He earned his B.S. (Bachelor of Science in Forestry) from the University of New Hampshire.

6.1.3 Assessment Process

The scope of the 2006 annual audit included: document review, office group discussions, viewing three permanent reserve sites, two recently completed and one on-going timber harvests, and the interview of individual management personnel. The auditor chose field sites to visit based upon two overlapping priorities: sites that have not received previous audit visits, and recent or on-going timber harvest operations.

Kane personnel involved in the audit process included:

Blaine Puller, Forest Manager
Connie Grenz, General Manager (office only)
Ned Karger, Silvicultural Manager
Brian Parana, Regional Forester
Dan Witherell, Regional Forester (office only)
Dave Trimpey, Harvest Manager

Tom C. Kase, Silvicultural Supervisor
John Williams, Harvest Supervisor
Michael Hancharick, GIS Forester
James Snyder, Procurement Forester

Oct. 19, 2006 (Blaine Puller, Ned Karger, Brian Parana, Tom Kase, James Snyder, John Williams)

Trust 13

- Viewed a 58 acre stand which had been treated once with herbicide to eliminate the fern understory and to control undesirable woody competition during an acorn crop year. All unusual plants and conifer species were preserved on the site.
- Excellent response to thinning in the oak stand, very little epicormic sprouting and vigorous growth.
- An adequate buffer was left along Little Minister Creek; however this buffer was not included in CPF's GIS (Recommendation 2006.1)
- Visited a second and final stage shelter-wood harvest with islands of residuals retained containing, conifers, seed trees and den trees. The stand had excellent mixed regeneration in place, including extensive red oak saplings, resulting from the first stage of the shelter-wood harvest.

Trust 12

- 120-acre harvest in three separate units were harvested this past winter and summer. The logging was well done, leaving a large amount of coarse woody debris. The harvest left the site well prepared for substantive regeneration.
- The stand had been treated with Oust and Accord, and the logging crew was paid to cut off the stems which would survive the herbicide.

Forest 18

- Visited a 15 acre salvage thinning of beech, declining maple, and low quality stems. The harvest was underway, but the crew was not present due to the weather. This shelter-wood harvest was carried out using a three-wheeled Bell shear and two grapple skidders. There was very little damage to the residual stand.
- The shelter-wood was adjacent to the East Branch of Spring Creek, which contains a State of Pennsylvania Threatened Species, the mountain brook lamprey. A buffer was provided along the creek to insure that the logging would not impact the lamprey's habitat. This buffer reserve area is documented on the GIS system, and is in the permanent reserves.
- A 10 acre unit was marked for a shelter-wood harvest.

6.1.4 Status of Corrective Action Requests

Background/Justification: CPF has not explicitly invited participation of American Indian groups that may be interested in protecting cultural and archeological resources on the CPF	
CAR 2005.1	By the 2006 annual audit, CPF needs to:

	4. Using a list of relevant tribes, available from the PA Historical Commission, CPF determined which tribes to contact to determine which tribes to contact regarding forest management activities that occur on CPF lands. 5. If tribes are interested, CPF must develop consultative mechanisms and initiate consultation with relevant tribes about protection of archeological and cultural resources. 6. Develop and implement a Standard Operating Procedure or equivalent document that details consultation mechanisms and subsequent safeguards to protect identified resources.
Deadline	By the 2006 surveillance audit
Reference	FSC Criterion 3.2, 3.3
Action Taken By Company/Auditor Comments- CPF sent fifteen letters to various tribal interests, who were selected based upon State of PA records of native people's history in the region. The letters were sent to either the tribal president or the tribe's cultural department. CPF received only one response from the Shawnee in Oklahoma, who stated that they were not aware of any sites in the region.	
Position in the end of this audit: The CAR is hereby satisfied and closed.	

Background/Justification: CPF lacks a formal process for partners and the general public to comment on CPF management and for CPF to incorporate this input into its planning. Although it is clear that this already happens on an informal basis, FSC requires a slightly more formal and documented process.	
CAR 2005.2:	By the 2006 annual audit CPF will have developed and implemented formal mechanisms for assessing and recording social impact of their management activities, for example, a log of key comments received and any responsive actions taken.
Deadline	By the 2006 annual audit
Reference	*FSC Criterion 4.4*
Action Taken By Company/Auditor Comments- CPF maintains a record of comments on their land ownership and management. An inquiry file is kept for any negative comments received concerning their management activities. CPF informed the auditor that no negative comments have been received for many years.	
Position in the end of this audit: This CAR is satisfied and closed.	

Background/Justification: Although CPF is monitoring and recording invasive exotic plant occurrences, they have yet to develop an action plan to control them	
CAR 2005.3	Once the State-wide plan for prioritizing invasive exotic plant treatments is complete, CPF shall implement a specific invasive control and treatment plan for invasive plants on the CPF
Deadline	6 months following completion of Pennsylvania's State-wide management strategy for invasive exotics
Reference	*FSC Criterion 6.9*

Action Taken By Company/Auditor Comments-The State of Pennsylvania released the aquatic plan early this year and has just released the terrestrial plan. CPF has treated four sites of Japanese knotweed. Additionally, CPF is working on a collaborative effort with the Forest Service to prevent the spread of knotweed along Pionesta Creek. CPF will better formulate their plan after a 2007 visit from a Cornell University invasive plant expert who will conduct research in the region. Ned Karger attended two of the invasive plant conferences. **A written position with an explanation regarding the plan for invasive plants of highest concern must be prepared by CPF.**
Position in the end of this audit: This CAR will remain **OPEN** and will be satisfied by the 2007 audit.

Background/Justification: There is no public summary of monitoring results	
CAR 2005.4	Within 12 months after finalization of the 2005 recertification report, CPF must develop a procedure and capacity to provide a timely response to any express request from an interested party seeking a public summary of the results of periodic monitoring, per FSC Criterion 8.5. The company's response to a request for a public summary of monitoring results should, while respecting CPF's confidentiality, address basic monitoring activities, including those enumerated in FSC Criterion 8.2: • Yield of forest products harvested • Growth rates, regeneration and conditions of the forest • Composition and observed changes in flora and fauna • Environmental and social impacts of harvesting and other operations
Deadline	By the 2006 Annual Audit
Reference	*FSC Criterion 8.5*
Action Taken By Company/Auditor Comments-There is a file available to the public, upon request, with a group of company reports in it. The availability of data depends upon who is making the inquiry. Data is available concerning: • volumes of logs processed by the mill • regeneration records which are kept and available for three surveys completed on each harvest unit • Jennifer Macey will personally respond to any inquiries regarding environmental and social impacts of harvesting and operations. **Inquiries beyond this level are overly intrusive to discretionary company data. The auditor deems this a reasonable position.**	
Position in the end of this audit: This CAR is satisfied and closed.	

Background/Justification: CPF has yet to undertake a consultation process regarding identification of HCVF.	
CAR 2005.5	By the 2006 annual audit, CPF must initiate focused consultation with select stakeholders (such as Allegheny National Forest Service biologists

	or other area wildlife biologists, Natural Heritage staff, interested faculty members at State College, among other specialists) seeking their input on defining and identifying HCVF, and building upon current CPF Reserve systems.
Deadline	2006 annual audit
Reference	*For Example: FSC Criterion 9.2*
Action Taken By Company/Auditor Comments- During the past year, CPF has consulted with The Allegheny National Forest, Pennsylvania Natural Heritage, Rob Brooks of Penn. State, and TNC regarding input on their HCVF system. All consultation thus far has been by telephone and lacks documentation. This process will be ongoing. An informal comment by the Pennsylvania Nature Conservancy was that all of Kane's forests were HCVF due to their management techniques. Currently over 5% of CPF lands are HCVF reserves. **CPF's work completed so far on this CAR warrants an extension until the 2008 surveillance audit. By the 2007 surveillance audit, consultations need to be completed and documented.**	
Position in the end of this audit: Due 2007 surveillance Audit	

6.1.5 General Observations

Collins-Kane Hardwood fertilizes approximately 200 acres of sapling growth per year, primarily to speed the growth above deer browse height. Herbicide use is limited to Oust and Accord, and Arsenault on a limited basis.

6.1.6 New Corrective Action Requests and Recommendations

No new Corrective Action Requests have been issued for 2006.

Recommendations:

Background/Justification CPF has completed most, but not all, of the documentation of stream buffer reserves onto their GIS. These buffers are a portion of CPF's HCVF system.	
REC 2006.1	By the 2007 audit CPF should complete the documentation of all stream buffers onto their GIS map system. The company should also review the recently acquired 1,529 acres for HCVF's.
Reference	*For Example: FSC Criterion 9.1.*

6.1.7 General Conclusions of the Annual Audit

Based upon information gathered through site visits, interviews, and document reviews, the SCS auditor concludes that CPF's management of its forests in northwestern Pennsylvania continues to be strong in overall compliance with the FSC Principles and Criteria. CPF's forest management program is in strong conformance with FSC Principles 1 through 9 (Principle 10 is not applicable, as CPF's operations are classified as "natural forest management" under the FSC definitions). As such, continuation of the

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

6.2 2007 Annual Audit

6.2.1 Assessment Dates

The 2007 Annual Audit took place September 24, 2007.

In addition to the one auditor days necessary to conduct the field portion of the annual audit, 1.5 auditor days were dedicated to pre-audit preparation and report writing. The principal pre-audit activities involved document review and interviewing stakeholders prior to initiating the on-site inspection of forestry operations.

6.2.2 Assessment Personnel

Sterling Griffin, RPF #2805: Sterling Griffin is a Senior Certification Forester with Scientific Certification Systems. He is a Registered Professional Forester in the State of California with 10 years professional experience in private and public forest management. He is a graduate of Purdue University with a B.S in Forestry and has conducted Forest Stewardship Council (FSC) endorsed assessments on over 6 million acres of forestland in North and South America. Recent FSC assessments have included public lands administered by Fort Lewis, WA Forestry Branch, Michigan DNR, Indiana DOF, New York DEC, Maryland DNR and numerous private operations in Maine, Pennsylvania, Oregon, Washington, and California. Prior to joining SCS, he was the founder of a private consulting firm in Northern California specializing in sustained yield management, fuels reduction, and forest health management. His professional career also includes silvicultural and ecosystem research for the U.S. Forest Service. Areas of research activities include stand level response to vegetative competition and Long-Term Ecosystem Productivity (LTEP) in the Pacific Northwest.

6.2.3 Assessment Process

The scope of the 2007 annual audit, as with all annual audits, included: document review, field and office visits, interviewing management personnel and, as appropriate, interacting with outside stakeholders

The following site visits of the 2007 surveillance audit were conducted during September 24, 2007:

McKean 43 block 15

- Stand marked for shelterwood harvest. Long-term residuals marked with orange. Seed trees marked with blue.
- Stand was pretreated with herbicides prior to harvest to control beech, striped maple, and fern.

- Observed island reserve within stand to protect unique habitat features. Area was not sprayed by contractor.
- Harvested area contains good coarse woody debris retention. Long-term retention trees left within unit to provide future den and wildlife trees.
- Waterbars properly installed on haul road.

McKean 43 block 17
- Thinning sale. Leave trees marked.
- Viewed protection zones adjacent to stand boundary
- New road spur built to wellhead – good construction

McKean 57-019
- Viewed permanent reserve extending 150' from perennial stream. Area include some valuable cherry.
- Serviceberry marked for retention (unique habitat feature).
- Pre-harvest herbicide sprayed to reduce heavy beech. No drift into reserve area.

McKean 57-016
- Commercial thinning and shelterwood prescription. Cut trees marked.
- Black cherry and red maple marked as retention for seed trees.
- Handcrew observed using all the proper safety equipment.

Kane personnel involved in the audit process included:
Blaine Puller, Forest Manager
Connie Grenz, General Manager (office only)
Ned Karger, Silvicultural Manager
Brian Parana, Regional Forester
Dan Witherell, Regional Forester (office only)
Dave Trimpey, Harvest Manager
Tom C. Kase, Silvicultural Supervisor
John Williams, Harvest Supervisor
Michael Hancharic, GIS Forester
Jamie Snyder, Procurement Forester

6.2.4 Status of Corrective Action Requests

Background/Justification: Although CPF is monitoring and recording invasive exotic plant occurrences, they have yet to develop an action plan to control them	
CAR 2005.3	Once the State-wide plan for prioritizing invasive exotic plant treatments is complete, CPF shall implement a specific invasive control and treatment plan for invasive plants on the CPF
Deadline	6 months following completion of Pennsylvania's State-wide management strategy for invasive exotics

Reference	*FSC Criterion 6.9*
Action Taken By Company/Auditor Comments-The State of Pennsylvania released the aquatic plan early this year and has just released the terrestrial plan. CPF has treated four sites of Japanese knotweed. Additionally, CPF is working on a collaborative effort with the Forest Service to prevent the spread of knotweed along Pionesta Creek. CPF will better formulate their plan after a 2007 visit from a Cornell University invasive plant expert who will conduct research in the region. Ned Karger attended two of the invasive plant conferences. A written position with an explanation regarding the plan for invasive plants of highest concern must be prepared by CPF. This CAR will remain OPEN and will be satisfied by the 2007 audit.	
Action Taken By Company/Auditor Comments- CPF has presented a written explanation of the invasive species control program. This program includes continued participation in the DCNR Ecosystem Management Advisory Committee, participation in the PA Biodiversity Partnership, training of the staff in invasive species identification, maintaining educational resource files for the staff, development of a system to record occurrences in the GIS, and monitoring of treatment efforts. Active participation in collaborative efforts should enable CPF to remain current in emerging techniques and approaches to control the spread and treatment of invasive species.	
Position in the end of this audit: The auditor has concluded that CPF has fulfilled this CAR and is making good efforts towards controlling the spread of invasive species. **The CAR is CLOSED.**	

Background/Justification: CPF has yet to undertake a consultation process regarding identification of HCVF.	
CAR 2005.5	By the 2006 annual audit, CPF must initiate focused consultation with select stakeholders (such as Allegheny National Forest Service biologists or other area wildlife biologists, Natural Heritage staff, interested faculty members at State College, among other specialists) seeking their input on defining and identifying HCVF, and building upon current CPF Reserve systems.
Deadline	2006 annual audit
Reference	*For Example: FSC Criterion 9.2*
Action Taken By Company/Auditor Comments- During the past year, CPF has consulted with The Allegheny National Forest, Pennsylvania Natural Heritage, Rob Brooks of Penn. State, and TNC regarding input on their HCVF system. All consultation thus far has been by telephone and lacks documentation. This process will be ongoing. An informal comment by the Pennsylvania Nature Conservancy was that all of Kane's forests were HCVF due to their management techniques. Currently over 5% of CPF lands are HCVF reserves. CPF's work completed so far on this CAR warrants an extension until the 2008 surveillance audit. By the 2007 surveillance audit, consultations need to be completed and documented.	
Position in the end of this audit: CPF has provided documentation regarding the consultation process and designated HCVF reserve areas within the ownership. Updates to the HCVF reserve system will be assessed during future audits. **As a result of the 2007 audit, this CAR is CLOSED**.	

6.2.5 General Observations

CPF is employing exemplary silvicultural techniques that are focused on desirable species, good seed tree retention, and appropriate rotation lengths. Their management includes a strong focus on ecological considerations and features a well designed reserve system. Key habitat structures are identified and retained.

6.2.6 New Corrective Action Requests and Recommendations

No new corrective action requests are made at this time.

Recommendations:

Background/Justification: CPF has identified several significant archaeological features that are being protected during management operations. However, the sites are not included in the company GIS. Including any known site in the permanent GIS system would help to ensure their long-term protection.	
REC 2007.1	CPF should develop a permanent archaeological layer within the company GIS system.
Reference	*FSC Principle 3*

Background/Justification: CPF applies protection buffers to intermittent stream corridors and marks them in the field. However, the harvest maps do not always show the streams or the protection corridors.	
REC 2007.2	CPF should make an improved effort to GPS intermittent streams channels when conducting timber sale layout and include a GIS data layer to depict the streams and protection buffers.
Reference	*FSC Principle 6*

6.2.7 General Conclusions of the Annual Audit

Based upon information gathered through site visits, interviews, and document reviews, the SCS auditor concludes that CPF's management of its forests in northwestern Pennsylvania continues to be strong in overall compliance with the FSC Principles and Criteria. CPF's forest management program is in strong conformance with FSC Principles 1 through 9 (Principle 10 is not applicable, as CPF's operations are classified as "natural forest management" under the FSC definitions). As such, continuation of the certification is warranted, subject to ongoing progress in closing out the two open CARs and subject to subsequent annual audits.

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.