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

Collins Lakeview Forest

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

CERTIFICATION REGISTRATION NUMBER
SCS-FM/COC-00012N

Submitted to:

Collins Lakeview Forest
P.O. Box 1340, Lakeview
Oregon

Lead Author:

Dave Wager, SCS

Date of Field Audit: October 23-24, 2007

Date of Report: March 12, 2008

Recertified: March 15, 2008

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. Section B contains more detailed results and information for the use of Collins Lakeview.

FOREWORD

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by Collins Lakeview to conduct a certification evaluation of the Warner, Modoc, and Fremont tracts. 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 October June 2007, an SCS team collected and analyzed written materials, conducted interviews and completed a two-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 evaluated conformance to the 56 FSC Criteria in order to determine whether an award of certification was warranted.

This report is issued in support of a recommendation to re-award FSC-endorsed certification to Collins Lakeview. 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).

SECTION A- PUBLIC SUMMARY AND BACKGROUND INFORMATION
1.0 GENERAL INFORMATION

1.1 FSC Data Request

Applicant entity	Collins Lakeview Forest
Contact person	Lee Fledderjohann
Address	P.O. Box 1340, Lakeview, Oregon 97630
Telephone	541-947-2018
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Certificate Number	SCS-FM/COC-00012N
Certificate/Expiration Date	3-15-2008
Certificate Type	FM
SLIMF *if applicable*	*NA*
Group Members *if applicable*	NA
Number of FMU's *if applicable*	1
Number of FMUs in scope that are	
less than 100 ha in area	
100 - 1000 ha in area	
1000 - 10 000 ha in area	
more than 10 000 ha in area	1
Location of certified forest area	Lakeview Oregon
Latitude	
Longitude	
Forest zone	Temperate
Total forest area in scope of certificate which is included in FMUs that:	
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]	66,095 acres
state managed	
community managed[2]	
Number of forest workers (including contractors) working in forest within scope of certificate	25
Area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	1,250
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0

[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 management unit is one in which the activities in and use of the forest and tree resources is controlled by local communities.

Area of forest classified as 'high conservation value forest'	1,250
List of high conservation values present[3]	HCV 2-5
Chemical pesticides used	
Total area of production forest (i.e. forest from which timber may be harvested)	64,845
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]	0
Area of production forest regenerated primarily by natural regeneration	64,845
List of main commercial timber and non-timber species included in scope of certificate (botanical name and common trade name)	ponderosa pine (*Pinus ponderosa*), white fir (*Abies concolor*), incense cedar (*Calocedrus decurrens*), lodgepole pine (*Pinus contorta*) and white pine (*Pinus monticola*).
Approximate annual allowable cut (AAC) of commercial timber	7.8MMBF
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	0
List of product categories included in scope of joint FM/COC certificate and therefore available for sale as FSC-certified products (include basic description of product - e.g. round wood, pulp wood, sawn timber, kiln-dried sawn timber, chips, resin, non-timber forest products, etc.)	Round wood, pulp wood, chips

Conversion Table English Units to Metric Units

Length Conversion Factors

To convert from	to	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
acre (ac)	hectare (ha)	0.4047

Volume Conversion Factors

Volume

To convert from	to	multiply by
cubic foot (cu ft)	cubic meter (cu m)	0.02831685
gallon (gal)	liter	4.546

[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.

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.

1.2 Management Context

As The Collins Lakeview Forest is located in both Oregon and California, management of the forests is subject to a host of local, state and federal regulations. The principal regulations of greatest relevance to forest managers in these regions are associated with the following statutes:

Pertinent Regulations at the Federal Level:
Endangered Species Act
Clean Water Act (Section 404 - wetland protection & Section 303d - impaired water bodies)
Occupational Safety and Health Act
National Historic Preservation Act
Archaeological and Historic Preservation Act
Americans with Disabilities Act
U.S. ratified treaties, including CITES

Pertinent Regulations at State and Local Level:
Z'Berg-Nejedly Forest Practice Act
California Environmental Quality Act
California Endangered Species Act and Fish & Game Code
Natural Communities Conservation Planning Act
Porter-Cologne Water Quality Act
California Coastal Act
Oregon Forest Practices Act

1.2.1 Environmental Context

The Collins Lakeview Forest is situated in south-central Oregon and extreme northeastern California, on the periphery of the high desert of eastern Oregon and Nevada. While there are variations across the three tracts that comprise the Collins Lakeview Forest, the entirety can be characterized as occupied by the Eastside Pine vegetation type. This vegetation type is associated with a generally dry climate (approximately 16 inches of precipitation per year), very hot but short summers and cold winters. Most of the precipitation falls as snow. The subject property is generally of lower site productivity due to thin soils and limited precipitation.

The principal commercial tree species on the property are ponderosa pine and white fir, though sugar pine, western white pine, lodgepole pine and incense cedar are also present in limited and isolated numbers. Aspen, a non-commercial species in this region, is found throughout the ownership as well. Non-tree species common to the Eastside pine association in the region include squawcarpet, sagebrush and rabbitbrush.

The *Management Plan for the Collins Lakeview Forest* (2006) reports that the soils in the Lakeview region are immature regosolic soils with moderate to low organic matter content in the A horizon, and that grade into relatively unweathered pumice sand and gravel.

1.2.2 Socioeconomic Context

From a socioeconomic standpoint, the Collins Lakeview Forest is the last remaining industrial forestry concern in the Lakeview region. Accordingly, the Collins operation and its employees play an important role in the economic health and social fabric of the region. Sawmill and woods jobs along with the tax revenue from the Fremont mill are vital to the Lakeview community. The sawmill has continued to run in spite of the economic downturn that has depressed the timber industry.

The region can be characterized as rural and socially conservative, with a strong orientation towards commodity natural resource utilization. Cattle ranching is a major component of both the economic and social framework of the region. Environmental activism is limited in the region. There are no active representatives of any national or regional environmental organizations residing within the Lakeview area. What environmental activism that does exist in the region is almost entirely focused on the management of the Fremont National Forest. Sourcing timber for the Fremont mill has become increasingly difficult because of the lack of harvesting on Forest Service Lands. The Lakeview Forest only provides approximately 1/3rd of the mills supply, thus availability of outside timber is essential to the mill's success.

1.3 Forest Management Enterprise

1.3.1 Land Use

The Management Plan for the Collins Lakeview Forest (2003) reports that Fremont Lumber Company was formed under Collins Pine Company in the late 1930's to purchase the 24,000-acre Dusenbury tract of timberland north of Lakeview. In 1945, Ostrander Construction Company became involved in the purchase of Lakeview Sawmill, and in 1946 purchased the Anderson Mill that was renamed as Fremont Sawmill.

The 18,000 Louisiana-Pacific tract came with the purchase of LP's sawmill by Ostrander Resources Company in 1987. Its past ownership's included Underwood & Underwood, Mazama Timber, and Forest Solomon as well as others. It also supplied logs to the local sawmills starting back in the early 1930's.

Additionally, in 1990, Ostrander purchased the 30,000-acre Modoc Tract" from Weyerhaeuser Company. Lying in California, this tract supplied large diameter ponderosa pine for Weyerhaeuser as well as local mills starting in the 1960's through the 1970's.

Collins Products Limited Liability Company, in 1996, was formed with the melding of the Fremont Lumber tract from Collins Pine and the LP, Weyco, and other assorted tracts from Ostrander Resources. This 75,000-acre collection of lands is managed out of Fremont Sawmill in Lakeview by the same staff and under the same management objective as before. However, in 1999, the ownership changed once again, and now Collins Timber Company, LLC owns the timberlands.

The following table is a list of the major tracts of land and an estimate of forested and non-forested acres of each tract.

Tract Name	Total Acres	Forested	Non-Forested
Fremont Lumber	24,689	22,418	2,271
Warner Mt.	22,323	18,622	3,706
Modoc	30,101	24,598	5,503
Other	783	708	75
Total	79,305	66,346	11,550

Livestock Grazing

On the majority of the CLF lands, grazing leases are entered into with cattle ranchers to utilize the available grasses during the summertime for their cattle herds. It is becoming more and more apparent that the current method in which the cattle are grazed may have an impact upon the forest resources; especially the water portion. There are many streams and riparian areas that can support grazing with proper management. However, there are areas on the forest where even the lowest level of grazing will adversely affect the stream.

Currently CLF is developing voluntary guidelines for grazing lessee. The guidelines are aimed at adding protection to the forestland base. Grass exclosures have been placed out on all three tracts to determine grazing intensity. This monitoring will give CLF managers important information for determining timing and numbers for future leases.
Oregon regulatory constrains, through what is known as Senate Bill 1010, will further regulate the grazing practices. This regulation, through the Oregon Department of Agriculture, forms Local Advisory Committees to identify best management practices for agricultural and ranching activities within the state.

1.3.2 Land Outside Scope of Certification

The Collins Pine Company also owns and manages the Almanor, California and Kane, Pennsylvania forests, both of which have been FSC certified for over 10 years.

1.4 Management Plan

1.4.1 Management Objectives

Collins Lakeview Forest timberlands are managed for sustained yield of high quality forest products consistent with a high level of societal, economic and environmental integrity.
The CLF commitment is reflected in the objectives of their forest management operation:

1. To achieve sustain yield of high quality timer across the ownership
2. To maximize production of all forest products; consistent with sustainability
3. To provide economic return (benefit) to the stakeholders directly and indirectly involved with the ownership and operations of the lands.
4. To provide leadership to bring about change in local and regional forest management

1.4.2 Forest Composition

The principal commercial tree species on the property are ponderosa pine and white fir, though sugar pine, western white pine, lodgepole pine and incense cedar are also present in limited and isolated numbers. Aspen, a non-commercial species in this region, is found throughout the ownership as well. Non-tree species common to the East-side pine association in the region include squawcarpet, sagebrush and rabbitbrush.

1.4.3 Silvicultural Systems

The dominant silvicultural system employed is uneven-age management, utilizing singletree and group selection to regenerate species that are biologically and economically desirable, while discriminating against species that are less valuable and not as well adapted to the local ecological conditions. In general, this means that ponderosa pine is the preferred species, being longer lived, more drought and fire-resistant, and more valuable than its primary associate, white fir. The most common silvicultural treatment employed is removal of abundant quantities of small diameter stressed or dead or dying white fir and ponderosa pine, while retaining crop trees, primarily ponderosa pine, that are vigorous and well spaced. Regeneration of ponderosa pine is encouraged and, where absent, inter-planting is conducted to ensure adequate stocking.

1.4.4 Management Systems

The CLF ownership is divided into three Tracts: Warner, Modoc, and Fremont. All lands are managed under the direction provided in the CLF Management Plan (2006). The Vice President of Resource is ultimately responsible for all activities on the CLF. The Resource Manager is responsible for all planning, direction, and monitoring of forest activity. The Lands Manager is responsible to plan, direct, and monitor all activities on CLF lands in relation to the management plan. Forest Technicians are responsible for implementation-such as timber cruising, harvest area preparation, mapping, record keeping, etc.

1.4.5 Monitoring System

CLF has planned monitoring initiatives/efforts to assess, among other things:

- Timber inventory, growth, and yield of harvests
- Tree species composition
- Water quality, including sedimentation, erosion, temperature, turbidity, etc.
- Fisheries—population and habitat
- Road conditions
- Environmental impacts of harvesting

1.4.6 Estimate of Maximum Sustainable Yield

Collins Lakeview completed a comprehensive timber cruise in 1999. The resulting data has been compiled and incorporated into a growth and yield monitoring software program (Forest Projection System, developed by Forest Biometrics). Based on the silvicultural system described in section 1.3.3 above, the current projected sustained yield from the properties is 7.8 million board feet (MMBF).

1.4.7 Estimated, Current and Projected Production

Actual rate of harvest over the past 10 years has been 6.8 MMBF per year, or slightly less than the projected sustained yield of 7.8MMBF. Individual years have had harvest removals reach as high as 12 MMBF (1992), but this is primarily due to major forest health problems, including bark beetle and drought stress leading to high levels of mortality which pose significant risk of catastrophic fire if not addressed.

The company conducts depletion cruises after harvesting to update its inventory and allow for increased accuracy in modelling activities. Continued validation to accurately calibrate yield projections is an ongoing endeavour.

1.4.8 Chemical Pesticide Use

Collins Lakeview Forest is using hexazinone to improve and ensure the success of artificial regeneration following stand-replacing fire. Additionally, glyphosate, triclopyr and 2-4D have been used in plantings and to treat invasive exotic plants, such as thistle. Clopyralid is used to treat invasive exotic plants such as thistle.

2.0 GUIDELINES/STANDARDS EMPLOYED

As the applicant forest property is located in northern California and Oregon, the certification evaluation that is the subject of this report was conducted against the duly-endorsed FSC Pacific Coast Regional Standard, version 9.0, May 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 visit portion of the main certification evaluation was conducted on October 23-24, 2007.

3.2 Assessment Team

Dave Wager, M.Sc. - **Team Leader**
Mr. Wager is Director of Forest Management Certification for SCS. During his 7 years as Director, Mr. Wager has overseen the day-to-day operations of the program and conducted Forest Management and Chain-of-Custody evaluations throughout the world. Recent evaluations conducted by Mr. Wager include Indiana State Forests, Minnesota DNR, Wisconsin County Forests, State of PA Bureau of Forestry, State of Massachusetts, Perak ITC- Malaysia, and Collins Pine Lakeview and Almanor Forests. In his role as Program Director, Mr. Wager oversees all first-time certification evaluations, annual audits, and contract renewal certifications on approximately 70 active clients. Mr. Wager has expertise in business and forest ecology (B.S. business, Skidmore College; M.S. Forest Resources, Utah State University) and utilizes both in his position with SCS. While studying forest ecology at Utah State University, Mr. Wager was awarded a NASA Graduate Student Research Fellowship to develop dendrochronological techniques to assess Douglas-fir growth in Utah's Central Wasatch Mountains.

Sterling Griffin: Sterling Griffin is a Certification Forester with Scientific Certification Systems (SCS). He is a Registered Professional Forester in the State of California with professional experience in private and public land management. He is a graduate of Purdue University with a B.S. in Forestry and has participated in Forest Stewardship Council (FSC) endorsed assessments on over 4 million acres of forestland throughout the United States. Recent certification assessments include public lands administered by the State of Michigan DNR, Indiana Division of Forestry, and private operations in 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, fuel reduction, and forest health management. His professional career also includes silvicultural and ecosystem research for the U.S. Forest Service. Areas of research activities included stand level response to vegetative competition and Long-Term Ecosystem Productivity (LTEP) in the Pacific Northwest.

3.3 Assessment Process

3.3.1 Itinerary

Opening Meeting: The team convened in Lakeview on Tuesday, October 23, 2007 and the audit process began with an opening meeting. The following individuals were present:

- Lee Fledderjohann, Resource Manager
- Travis Erickson, Lands Manager
- Tony Hamilton, Forestry Tech.

Field Visits: The audit team and Collins Lakeview staff spent the remainder of the 1st day inspecting post fire salvage activities and other miscellaneous sites. Audit activities on Day 2 included CoC audit, field inspections of the Warner Tract, team synthesis, and closing meeting, although only Dave, Travis and Tony were present in the field on the second day.

3.3.2 Evaluation of Management System

The audit team visited the Collins Lakeview Offices and two of the three tracts where management activities occur. SCS was able to look at range of different management activities.

3.3.3 Selection of FMUs to Evaluate

Collins Lakeview Forest is considered one FMU.

3.3.4 Units Visited

Oct 23- Modoc Tract

- Fletcher fire – salvage and site preparation

Fremont Lumber Tract

- Bear Flat
- Mac's Camp
- White King Fire

Oct 24- Warner Tract

- Red Rose Harvest
- Rosa Creek
- Twin Cabins
- Mud Creek area with forest health concerns
- Mud Vein

3.3.5 Stakeholder Consultation

Pursuant to SCS protocols, consultations with key stakeholders was a part of the evaluation process. SCS solicited input from affected parties as to the strengths and weaknesses of Collins Lakeview Forest, relative to the standard, and the nature of the interaction between the company and the surrounding communities.

Over the 10 years that Collins Lakeview Forest has been certified, SCS has received very little comment from stakeholders about Collins' operations. The comments that have been received have all been positive. Thus, SCS conducted a very narrow stakeholder consultation for the 2007 audit. The following types of groups and individuals were determined to be principal stakeholders:

- Local Tribal members and or representatives
- Members of the FSC Pacific Coast Working Group/National Initiative
- Local and regionally based environmental organizations and conservationists
- Local, State and Federal regulatory agency personnel

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

Stakeholder comments were positive and did not suggest any areas of possible non-conformance that would require further investigation.

3.4 Total Time Spent on Audit

The audit team spent approximately 10 auditor-days on the evaluation, including document review and audit preparation, stakeholder consultation, on-site evaluation, and report preparation. Dave spent two days in the field and Sterling one day in the field.

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 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	▪ CLF has an excellent track record of compliance with laws in OR and CA. ▪ CLF's practices in OR exceed those required by the OR Forest Practices Act. ▪ Managers and foresters are well informed regarding laws and regulations.	▪ None	None
P2: Tenure & Use Rights & Responsibilities	▪ The legal rights of ownership of the CLF are clearly and unquestionably established. ▪ CLF's policy of opening the majority of their lands to the public permits many customary uses. ▪ Rights of the lease holders are recognized through legal agreements.	▪ CLF staff have only engaged in limited and informal consultation with stakeholders regarding forest management activities	**CAR 2007.1**
P3: Indigenous Peoples' Rights	▪ Both the Resource Manager and the Lands Manager are trained in archeological site detection/determination in California. ▪ Tribes are notified of timber sales and invited to comment, although none of the notifications to-date have resulted in any comments or discussions. ▪ Local Tribes have been consulted.	▪ None	

P4: Community Relations & Workers' Rights	▪ Contracts specify compliance with applicable safety regulations. ▪ On the Modoc tract adjacent landowners, tribes, and other affected parties are notified of upcoming timber sales through the THP process. ▪ Historical, archeological, and cultural sites are identified, mapped, and protected. ▪ The "good neighbor" philosophy of CLF goes a long way in avoiding grievances. ▪ Adequate liability insurance is required and stipulated in contracts.	▪ Formal opportunities for offering input into CLF's management are needed on Oregon tracts	CAR 2007.1
P5: Benefits from the Forest	▪ CLF and Fremont Sawmill clearly reinvests in the local economy and the community. For example CLF recently made a substantial investment to build a small diameter mill. ▪ Fremont Sawmill's demand for wood does not determine harvest levels on CLF; rather harvest levels are determined by resource conditions. ▪ 100% of logs coming from company lands are processed locally. ▪ Residual stand damage levels were impressively low ▪ CLF ensures adequate utilization, which will improve tremendously with the new small diameter mill ▪ Harvest levels are adequately supported by a comprehensive Sustained Yield Management Analysis (Feb 2000), completed by Roger Greene.	▪ Because CLF does not have a standard/targets or inventory of woody debris retention and fuels treatment practices require large amounts of pile and burning, SCS is concerned whether adequate woody debris is being left on site	CAR 2007.2

P6: Environmental Impact	▪ CLF collaborates with Department of Fish and Wildlife/Game in both Oregon and California for conducting wildlife research. ▪ Riparian zone management takes a conservative approach and is sensitive to presence of red band trout, additionally CLF monitors streams for shade cover, temperature, and red band trout populations. ▪ CLF silviculture selects trees for harvest, retention, and planting in a manner that maintains or enhances the productive capacity, genetic diversity and quality, and species diversity of the residual stand.(6.3.b.1.) ▪ Selection silviculture on CLF generally results in stand conditions across the entire forest that meet the outer streamside buffer requirements of the Pacific Coast standard. ▪ Land management and silvicultural strategies are consistent with restoring ponderosa pine composition and structure. ▪ For rare/protected species and or communities with known special habitat requirements, conservation zones are established. ▪ CLF maintains native species, habitats (through WHR, snag policy etc), and a diversity of size/age classes.	▪ Salvage logging operations following the Fletcher fire, which consumed approximately 3000 acres of CLF timber, occurred without a robust environmental impact assessment. This salvage logging amounted to approximately 5-years worth of timber harvesting on the Modoc Tract, and thus more environmental review should have been done ▪ CLF does not have a standard or targets for woody debris retention. Because of legitimate fuel loading concerns, large amounts of woody debris are piled and burned ▪ There is a clear need for an operative definition of what constitutes a Type III old growth stand on CLF (CAR 2007.4) ▪ CLF needs to develop a retention policy for even-aged management treatments	▪ CAR 2007.3 ▪ CAR 2007.4 ▪ CAR 2007.5

P7: Management Plan	▪ Management plans are thorough and meet the breadth of Principle 7. ▪ The management plan is based on reasonable data on growth, yield, stocking, and regeneration. (5.6.b). ▪ CLF is committed to continued education for its staff. CLF keeps records of training workshops and classes attended. ▪ CLF has written a public summary of the management plan that covers the majority of the topics listed in P&C 7.1. ▪ Rationale for annual allowable harvest is well documented	▪ There is a public summary of the management plan. However, the plan is not posted on the Collins Pine Website, nor is there any mention that it is available upon request. ▪ The management plan needs to be expanded to include a landscape level analysis	CAR 2007.6
P8: Monitoring & Assessment	▪ Management plans are updated periodically, as new information becomes available, and no longer than every 10 years. ▪ Monitoring is carried out to an extent that covers the enumerated requirements of Principle 8.	▪ Public responses to management activities are not very well monitored	CAR 2007.1
P9: Maintenance of High Conservation Value Forest	▪ A network of HCVF sites have been identified and are described in the management plan.	▪ There is a clear need for an operative definition of what constitutes a Type III old growth stand on CLF	CAR 2007.4

4.2 Preconditions - Major CARs

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. There were no preconditions issued to CLF.

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 CLF be awarded FSC certification as "Well-Managed Forests," subject to the corrective action requests stated in Section 5.2. CLF has demonstrated their system of management is capable of ensuring that all of the requirements of the Pacific Coast Regional Standard are met over the forest area covered by the scope of the evaluation. CLF 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 (CARs)

Observed nonconformity: For harvesting activities in Oregon, CLF is not in conformance with 4.4.a. *Forest owners or managers of large-scale operations provide opportunities for people, as individuals and/or groups, to offer input into management planning when they are affected by forestry operations.* In California, the THP process ensures a minimal level of conformance.	
CAR 2007.1	CLF must develop and implement mechanisms for providing people and groups with notification of upcoming forestry operations and opportunities for input.
Reference	FSC Criterion 4.4.a
Deadline	2008 surveillance audit

Observed nonconformity: The Pacific Coast Standard requires retention of woody

debris for both habitat and productivity considerations as stated in the following Indicators:

5.3.c. Tree limbs, tops, snags, down logs, and other biomass are retained on site in adequate quantities and quality for ecosystem function, wildlife habitat, and future forest productivity. After adequate woody debris has been left on site to provide nutrient cycling and habitat, additional byproducts of harvest and in-the-field milling operations are considered for use in other productive processes.

6.3.e.1. Forest owners and managers retain (or, if absent, recruit) legacy trees, old and large trees, snags and woody debris to sustain populations of native plants, fungi, and animals, both within the harvest unit and across the FMU.

For example:

- *Old trees with irreplaceable characteristics are retained.*
- *In some dry regions, retaining approximately 10 tons of debris per acre may be sufficient. In wetter regions, retaining 20 tons of debris per acre may be sufficient.*
- *Debris is well distributed spatially and by size and decay class, with a goal of at least 4 large pieces (approximately 20" diameter X 15' length) per acre.*
- *Three to 10 snags per acre (averaged over 10 acres) are maintained or recruited.*

Snags are well represented by size, species, and decay class.

CLF does not have a standard or targets for woody debris. Because of legitimate fuel loading concerns, large amounts of woody debris are piled and burned.

CAR 2007.2	Develop and implement guidelines for woody debris retention/recruitment that address both coarse woody debris for wildlife and nutrient cycling/soil fertility. For salvage operations develop guidelines for randomly distributing slash for soil fertility taking into consideration fuel management goals and requirements.
Reference	FSC Criterion 5.3, 6.3
Deadline	2008 surveillance audit.

Observed nonconformity: Salvage logging operations following the Fletcher fire, which consumed approximately 3000 acres of CLF timber, occurred without a robust environmental impact assessment. These salvage logging amounted to approximately 5-years worth of timber harvesting on the Modoc Tract, and thus more environmental review should have been done.	
CAR 2007.3	CLF must develop and implement a harvest area environmental assessment process for salvage logging operations.
Reference	FSC Criterion 6.1 and Indicator 6.3.c.4
Deadline	2008 surveillance audit

Observed nonconformity: Mature and over mature Ponderosa Pine trees were harvested in the "Plucked Grouse" sale, which was an even-aged treatment to treat a mistletoe infected stand. The stand description stated that "none of these stands contain a homogenous mature overstory that would constitute it being classified as a Type 3 stand from FSC certification purposes". The justification (i.e., lack of homogenous mature overstory) for not identifying and maintaining Plucked Grouse as a Type 3 stand is inconsistent with the FSC definition for a Type 3 stand. FSC defines Type 3 Old Growth stands as "those that have residual old-growth trees and/or other late-successional/old-growth characteristics, but do not meet the definition of a Type 2 stand". Having a homogenous overstory is not a required characteristic of Type 3 stands. There is a clear need for an operative definition of what constitutes a Type III old growth stand on CLF.	
CAR 2007.4	CLF must develop an operative definition of Type 3 Old Growth stands (i.e., "residual old growth trees" and "late-successional/old-growth characteristics") for the CLF. CLF must also revisit the old growth identification work completed in 2005 (in response to CAR 2003.4) to ensure that all Type 2 and Type 3 stands are identified and maintained during future harvests.
Reference	FSC Criterion 6.3
Deadline	2008 surveillance audit

Observed nonconformity: 6.3.e.5. *Within harvest openings larger than 6 acres, 10-30% of pre-harvest basal area is retained. The levels of green-tree retention depend on such factors as: opening size, legacy trees, adjacent riparian zones, slope stability, upslope management, presence of critical refugia, and extent and intensity of harvesting across the FMU. Retention is distributed as clumps and dispersed individuals, appropriate to*

site conditions. Retained trees comprise a diversity of species and size classes, which includes large and old trees. Although CLF rarely carries out even-aged management, current forest health issues (mistletoe and pine beetle) are making even-aged management a more common tool for CLF. Thus, CLF must have a retention policy that is consistent with Indicator 6.3.e.5.	
CAR 2007.5	CLF must develop and implement a strategy for green tree retention in openings that exceed 6 acres.
Reference	FSC Indicator 6.3.e.5
Deadline	2008 surveillance audit

Observed nonconformity: The CLF Management Plan does not include a landscape level assessment per requirement 7.1.b.6: *Landscape-level considerations within the ownership and among adjacent and nearby lands, including major bodies of water, critical habitats, and riparian corridors shared with adjacent ownerships, are incorporated in the management plan.*	
CAR 2007.6	The CLF Management Plan must be expanded to cover landscape-level considerations, e.g., consideration of forest composition, age class distribution, forest health, differing management regimes, etc across CLF ownership and other the wider landscape.
Reference	FSC Criterion 7.1
Deadline	2008 surveillance audit

Recommendations

Recommendation 2007.1
Cattle grazing still occurs extensively on CLF, and in some areas to an extent where there are impacts to watercourses, such as in Rosa Creek. As such, CLF should exclude cattle from damaged watercourses and riparian areas.

Recommendation 2007.2
There is no written action plan and priority list for treating invasive exotic plant species. As such, CLF should prepare and implement a program for identifying, prioritizing, and treating invasive exotic plants.

Recommendation 2007.3
CLF should implement a formal system for identifying and prioritizing monitoring needs.

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 CLF to the Pacific Coast Regional Standard. It is anticipated that the first annual surveillance audit will occur during the summer of 2008. 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.