

**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

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Updated: February 2010 (See Section 6.2)

By:

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

**SCS Contact: Dave Wager, dwager@scscertified.com
Client Contact: Lee Fledderjohann. lfledderjohann@collinsco.com**

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the SCS website (www.scs-certified.com) no less than 30 days after issue of the certificate. Section B contains more detailed results and information for the use of 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).

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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
Fax	541-947-2832
E-mail	lfledderjohann@collinsco.com
Certificate Number	SCS-FM/COC-00012N
Certificate/Expiration Date	3-15-2008
Certificate Type	FM
SLIMF <i>if applicable</i>	NA
Group Members <i>if applicable</i>	NA
Number of FMU's <i>if applicable</i>	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 (<i>Pinus ponderosa</i>), white fir (<i>Abies concolor</i>), incense cedar (<i>Calocedrus decurrens</i>), lodgepole pine (<i>Pinus contorta</i>) and white pine (<i>Pinus monticola</i>).
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

<u>To convert from</u>	<u>to</u>	<u>multiply by</u>
mile (US Statute)	kilometer (km)	1.609347
foot (ft)	meter (m)	0.3048
yard (yd)	meter (m)	0.9144

Area Conversion Factors

<u>To convert from</u>	<u>to</u>	<u>multiply by</u>
square foot (sq ft)	square meter (sq m)	0.09290304
acre (ac)	hectare (ha)	0.4047

Volume Conversion Factors

<u>Volume</u>		
<u>To convert from</u>	<u>to</u>	<u>multiply by</u>
cubic foot (cu ft)	cubic meter (cu m)	0.02831685
gallon (gal)	liter	4.546

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	= 0.028317 cubic meters
1,000 cubic feet	= 28.317 cubic meters
Breast height	= 1.4 meters, or 4 1/2 feet, above ground level

Although 1,000 board feet is theoretically equivalent to 2.36 cubic meters, this is true only when a board foot is actually a piece of wood with a volume 1/12 of cubic foot. The conversion given here, 3.48 cubic meters, is based on the cubic volume of a log 16 feet long and 15 inches in diameter inside bark at the small end.

1.2 Management Context

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	<ul style="list-style-type: none"> ▪ 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. 	<ul style="list-style-type: none"> ▪ None 	None
P2: Tenure & Use Rights & Responsibilities	<ul style="list-style-type: none"> ▪ 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. 	<ul style="list-style-type: none"> ▪ CLF staff have only engaged in limited and informal consultation with stakeholders regarding forest management activities 	CAR 2007.1
P3: Indigenous Peoples' Rights	<ul style="list-style-type: none"> ▪ 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. 	<ul style="list-style-type: none"> ▪ None 	

P4: Community Relations & Workers' Rights	<ul style="list-style-type: none"> ▪ 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. 	<ul style="list-style-type: none"> ▪ Formal opportunities for offering input into CLF’s management are needed on Oregon tracts 	CAR 2007.1
P5: Benefits from the Forest	<ul style="list-style-type: none"> ▪ 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. 	<ul style="list-style-type: none"> ▪ 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

<p>P6: Environmental Impact</p>	<ul style="list-style-type: none"> ▪ 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. 	<ul style="list-style-type: none"> ▪ 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 	<ul style="list-style-type: none"> ▪ CAR 2007.3 ▪ CAR 2007.4 ▪ CAR 2007.5
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P7: Management Plan	<ul style="list-style-type: none"> ▪ 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 	<ul style="list-style-type: none"> ▪ 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	<ul style="list-style-type: none"> ▪ 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. 	<ul style="list-style-type: none"> ▪ Public responses to management activities are not very well monitored 	CAR 2007.1
P9: Maintenance of High Conservation Value Forest	<ul style="list-style-type: none"> ▪ A network of HCVF sites have been identified and are described in the management plan. 	<ul style="list-style-type: none"> ▪ 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. <i>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.</i> 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*

<i>site conditions. Retained trees comprise a diversity of species and size classes, which includes large and old trees.</i>	
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: <i>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.</i>	
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

6.1 2008 Annual Audit

6.1.1 Assessment Dates

Since the 2007 re-certification audit, the following audit activities were undertaken:

- CLF contacted its neighboring property, the USDA Forest Service in March 2008 regarding CAR 2007.1.
- During the Spring/Summer of 2008, Collins-Lakeview investigated the Rosa Creek undercut and grazing damage with a fish biologist from the Oregon Department of Forestry.
- CLF was re-certified on March 15, 2008.

One auditor day was spent on the office and field portions of the 2008 annual audit. Additionally, one day was spent interviewing stakeholders and reviewing documents.

6.1.2 Assessment Personnel

Mr. Kyle Meister, Lead auditor: Mr. Meister is a new Certification Forester with Scientific Certification Systems. This was his first annual audit as a lead auditor with SCS. Prior to Collins Lakeview Forestry, Mr. Meister participated in the annual audits of the Mendocino Redwood Company and the Michigan Department of Natural Resources, and the re-certification audit of Trout Mountain Forestry. He holds a B.S. in Natural Resource Ecology and Management and a B.A. in Spanish from the University of Michigan. He recently completed a Master of Forestry degree at the Yale School of Forestry and Environmental Studies. Prior to his graduate studies, Mr. Meister was an Emerald Ash Borer Outreach Coordinator with Michigan State University Cooperative Extension, an urban ecology and forestry educator, and apprentice forester. He has experience as an environmental educator and natural resource consultant in the U.S., Mexico, Ecuador, Costa Rica, and Colombia. Mr. Meister is the author of this report.

6.1.3 Assessment Process

The scope of the 2008 annual audit, as with all annual audits, included the following activities: document review, auditors spending time in the field and office, interviewing management personnel and, as appropriate, interacting with outside stakeholders.

CLF personnel present for the annual audit included Lee Fledderjohann, Resource Manager and Travis Erickson, RPF. The field portion of the audit focused on the Fremont FMU and included active and recent timber harvests, as well as selected areas of interest in response to 2007 CARs.

November 21, 2008

- 8:00 am – Office meeting

- Introductions
- Tour of Fremont Mill
 - Small diameter lumber, cogeneration plant
- Response to 2007 CARs
- 10:00 am – 3:30 pm – Field visit
 - Furby Sale
 - Shelterwood preparation cut – Snag and DWD retention, some snags topped to increase longevity and improve operator safety, leave tree marking, creation of 2-3 age classes.
 - McPole Sale
 - Ponderosa pine and white fir retention, salvage of infested Lodge pole pine. Rationale is to reduce potential for future insect outbreaks.
 - Three Stooges Sale
 - Selection system, leave tree marking – objective is to stabilize older trees and add volume to younger. The next entry (20 yrs.) will be to secure regeneration.
 - Aspen restoration site
 - CLF will work with the State of Oregon to restore Aspen in a riparian zone through removal of conifers and cutting the dying, mature Aspen to release suckers.
 - USDA Forest Service Border site
 - Discussion on Type III old growth.
 - Shoe String Division
 - Example of Type III old growth.
- 4:30 pm – Closing meeting and issuance of new CARs and/or recommendations

6.1.4 Status of Corrective Action Requests

Observed nonconformity: For harvesting activities in Oregon, CLF is not in conformance with 4.4.a. <i>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.</i> 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
CLF Response/ Auditor comments: CLF wrote the U.S. Forest Service, their neighbor, a letter in March about their upcoming timber sales and asked for comments. CLF received no response. People who subscribe to the Oregon timber harvest list receive notification of upcoming timber harvests. As such, this CAR can be closed.	

Observed nonconformity: The Pacific Coast Standard requires retention of woody debris for both habitat and productivity considerations as stated in the following Indicators: <i>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</i>

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
<p>CLF Response/ Auditor comments: CLF “will strive to provide habitat conditions for viable populations of snag-dependent species by meeting the snag requirement targets of 1 snag per acre with DNH of 15 to 24” and 0.5 snags per acre with DBH > 24.”</p> <p>“As dictated by natural diversity, snag requirements cannot be met on every acre. To the extent possible, the area of accountability will be the timber stand; all forested lands within each stand will be used to assess average snag densities. Clumped dispersion of snags is desired. Attempts will be made to retain both existing and replacement trees in harvest areas to meet snag requirement between harvest entries. In well stocked stands, where sufficient snag densities are not present, live trees may be selected and managed to create or maintain desired snag numbers.”</p> <p>“On poorly stocked stands with too few trees to meet snag requirements, reserve green, dead and dying trees (i.e., spiked tops) trees may be left to meet desired snag numbers” (<i>sic</i>).</p> <p>“In all vegetation types, we will aim to leave a minimum average of one down log per acre, at least 20 inches in diameter at the large end and 10 or more feet long parallel to the slope. When cull logs are developed during the logging process, rather than leave them at the landing, the loggers will be encouraged to drag the log back out to the stand and place it perpendicular to the slope.”</p> <p>CLF provided SCS with a DWD and Snag recruitment policy with a target for woody debris retention. As such, this CAR is now closed.</p>	

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
<p>CLF response/ Auditor comments:</p> <p>“It is unfortunate in thinking that just because a harvest area is large in size, we tend to spend less time on the environmental assessment of the property. Just because an area is large does not mean that we spend less time on preparing the area for harvest. In this case the Fletcher fire burned over 3,000 acres of the timberlands. When we were determining how we were going to go about and log the property, we reviewed the area and determined that it would be more beneficial to break the area up into smaller manageable harvesting blocks. Each one of these blocks had to pass not only our criteria for management, they also had to pass through the California Forest Practice act as well. Thus even though we harvest over three thousand acres of land, and individual harvest area was no bigger than what we might harvest under a green program. Time is of the essence in salvage operations. We will not spend several years in analysis paralysis to determine how the area should be logged. Our land, our trees will be used for a product. Delayed management will de-value the Owner’s investment, thus disallowing us to achieve our management goals.”</p> <p>“Our harvest assessment prior to the actual cutting of trees on a large scale salvage operation will have a higher focus on retaining snags and down woody material. Otherwise, our standard assessment methodologies will be implemented on salvage operation or green tree removal operations. All environmental factors will be assessed for impact and mitigation. Whether a stand has been impacted by fire or bug or not does not change our holistic approach to the assessment process.”</p> <p>Although the latter paragraph attempts to respond to CAR 2007.3, CLF has yet to adequately address it. As a salvage operation is usually an unexpected deviation from a harvest unit’s timber harvest plan, CLF must outline how it is to integrate Criterion 6.1, the associated indicators of C6.1, and Indicator 6.3.c.4 into its pre-salvage assessment. As such, this CAR remains open.</p>	
Deadline to respond: Within 30 days of receipt of this report.	

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.
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Reference	FSC Criterion 6.3
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CLF response/ Auditor comments: CLF defines a Type 3 old growth stand as follows: “One of goals of our forest management is to continue to maintain and recruit a portion of the healthiest old-growth type of trees for wildlife, aesthetic, and diversity purposes. In each harvest operation, the number of these trees is determined from on-site inspections and a judgement is made as to how many are to be harvested or retained. The percentage of old-growth trees harvested in each cutting cycle ranges from 25-75% depending upon their disposition and relative numbers. The fewer the initial number, the more likely they are to be retained. All Type 3 stands that will be subject to harvest activity will have the timber marking reviewed prior to harvest operations and they will receive post-harvest inventory surveys to ensure they will continue to meet the definition after the entry. CLF contains approximately 2,000 acres of Type 3 stands.”

“As a result of these harvest operations*, there are no Type 1 or Type 2 stands. There are stands that contain trees with the attributes of late successional/old-growth characteristics (such as slowed growth, open limb structure, flattened tops) that qualify as Type 3. However, due to the careful selection and encouragement of large trees that exhibit more of a second growth characteristics on CLF there are an abundance of stands that have a diversity of size and age classes present but do not meet the Type 3 definition.”

*Refers to 50+ years of management, including multiple rotations and entries, and periodic salvage logging.

CLF showed the auditor some of the stands that it has classified as Type 3 and the trees with associated size and structural characteristics. The above paragraphs shed light as to what conditions have led to the formation of Type 3 stands and what management will be used to perpetuate Type 3 stands. CLF is also on the right track in the field in identifying these areas, but it is difficult to pick out a clear definition of Type 3 old growth stands from the above paragraphs. This CAR has been folded into **CAR 2008.4**.

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.
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Reference	FSC Indicator 6.3.e.5
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CLF response/ Auditor comments: “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. However, with the declining epidemic beetle outbreak, this even-aged management schema will not be used as much in the future. We must note that we have landscape level mortality within stands of lodgepole pine. We will have areas that prior to harvest have no green trees to retain, therefore expect to see areas on the FMU that are lacking in green trees in openings larger than six acres; this is not a result of our direct management activities and thus falls under emergency conditions.”

“Within harvest openings larger than 6 acres, 10% of pre-harvest basal area will be 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 CLF. Retention trees comprise a diversity of species and size classes, which may include large and old trees if present.”

CLF has developed the retention policy stated above. The auditor observed some recent salvage operations and noted the nearly complete infestation of lodgepole pine with pine beetle in a neighboring stand. When healthy trees were present around areas of high mortality, CLF has been implementing its retention guidelines. As such, this **CAR can be closed.**

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
<p>CLF response/ Auditor comments: “CLF will solicit regimes from our adjacent landowners whom have a major impact on the area in relation to forest composition, age class distribution, forest health and other biotic factors. However, as we have seen in the past, these management scenarios that have played out on our federal neighbors have resulted in large scale catastrophic insect outbreaks and large scale soil scorching wildland fires. This CAR, in conjunction with CAR 2007.1 will be incorporated together to shape our management plan.”</p> <p>CLF has not demonstrated how it will (or has) combined its response to this CAR with CAR 2007.1. Furthermore, it has yet to address the concerns outlined in CAR 2007.6. This CAR remains open.</p> <p>Deadline: A response that properly addresses this CAR must be received within 30 days of receipt of this report.</p>	

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.

Response: CLF consulted with a fish biologist from the Oregon Department of Fish and Wildlife regarding this matter. The auditor called said fish biologist to review CLF’s response. The fish biologist and another State of Oregon employee went Travis Erickson to look at head cut on Rosa Creek. There was visible grazing damage at the head cut (by grazing permitted by CLF). However, the head cut also could have been caused, or aggravated, by the installation of a new culvert on a county road upstream. Mr. Erickson wanted to use some engineering measures to stabilize the head cut and fence the head cut area to keep grazing out. Collins is applying for state cost share funding to deal with this issue.

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.

Response: CLF has not developed a written action plan and priority list for treating invasive exotic plant species. See CAR 2008.2.

Recommendation 2007.3

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

Response: CLF has not implemented a formal system for identifying and prioritizing monitoring needs. See CAR 2008.3.

6.1.5 General Observations

CLF management has been responding to many challenges, both economic and ecological in nature. The small diameter lumber mill and cogeneration plant have arrived at a time when devastating insect outbreaks and unnaturally large fires have ravaged much of western states' forests. On the one hand, it has increased their silvicultural options in response to such events. Moreover, the updated mill technology allows them to improve utilization and use a preventative approach to forest health issues, which could ensure the resilience of its forested lands. The arrival of these mill technologies also unfortunately coincides with a major financial downturn in world timber markets. CLF is the largest private employer in Lakeview, OR and much of the community depends on them for work. The auditor noted that CLF cares a lot about its employees and the Lakeview community. CLF has been doing everything that it can to maintain its workforce during this time. CLF has been actively engaged with the Lake County Resource board on the addition of its cogeneration plant and environmental stewardship issues in the community.

When it comes to FSC certification, one of the biggest barriers for CLF is its reluctance to document interactions with the community, changes in its management course due to unexpected events, adaptive management, and other activities that fall under the scope of FSC certification.

6.1.6 New Corrective Action Requests and Recommendations

Background/Justification: CLF is using the January 2007 version of the "Oregon Department of Forestry Forest Practice Administrative Rules and Forest Practices Act." The latest version includes the most recent changes to the FPA rules effective as of July 1, 2008.	
CAR 2008.1	CLF shall evaluate upcoming timber sales to make sure that they comply with any changes to the FPA rules and ensure that all future sales do as well. To avoid problems with this in the future, CLF should develop a system to stay up to date on changes to applicable forest rules and laws.
Deadline	2009 Annual Audit
Reference	<i>FSC Criterion 1.1</i>

Background/Justification: There is no written action plan and priority list for treating invasive exotic plant species.	
CAR 2008.2	CLF should prepare and implement a program for identifying, prioritizing, and treating invasive exotic plants.
Deadline	2009 Annual Audit
Reference	<i>FSC Indicator 6.9.b</i>

Background/Justification: CLF has no formal system for identifying and prioritizing monitoring needs as indicated under FSC Principle 8.	
CAR 2008.3	Collins-Lakeview must a formal system for identifying and prioritizing monitoring needs. Examples may include, but are not limited to, post-

	salvage monitoring for regeneration and invasive species.
Deadline	2009 Annual Audit
Reference	<i>FSC Principle 8</i>

Background/Justification: CLF response to CAR 2007.4 contains a definition of Type 3 old-growth stands that is far too long and difficult to interpret to provide clear guidance in the field to managers as to what constitutes a Type 3 old-growth stand.	
CAR 2008.4	CLF shall develop a definition of Type 3 old-growth stands that reflects the observations made in CAR 2007.4 and characteristics of the 2,000 acres that it has defined in the field.
Deadline	2009 Annual Audit
Reference	<i>FSC Criterion 6.3</i>

Recommendations:

Background/Justification: Near one of the smoldering areas on the way to visit a Type 3 stand, a large puddle had formed that was almost half the width of the road in size.	
REC 2008.1	Since this area is near an active harvest site, this poorly drained area should be fixed before it becomes a bigger problem.
Reference	<i>FSC Indicator 6.5.j</i>

6.1.7 General Conclusions of the Annual Audit

Based upon information gathered through site visits, interviews, and document reviews, the SCS audit team concludes that CLF’s management of Collins Pine holdings in, Lakeview, OR and Modoc County, CA continues to be in overall compliance with the FSC Principles and Criteria, as elaborated by the Pacific Coast Regional Guidelines. That is, and while there remain aspects of the management program that are deficient relative to the standard of certification, the SCS audit team has concluded from this annual audit that CLF’s forest management program is in general conformance with FSC Principles 1 through 9 (Principle 10 is not applicable as CLF’s operations are classified as “natural forest management” under the FSC definitions). As such, continuation of the certification is warranted, subject to the ongoing progress in closing out the two open CARs and subject to subsequent annual audits.

6.2 2009 SURVEILLANCE DECISION AND PUBLIC RECORD

2.1 Assessment Dates

Since the 2008 annual audit, the following audit activities were undertaken:

- February 24, 2009 – CLF holds cumulative impacts meeting with U.S. Forest Service
- May 14, 2009 – CLF turns in responses to Major CARs and minor CARs from 2008.
- June 5, 2009 – SCS turns in updated 2008 annual audit report to CLF with Major CARs closed.

A total of three auditor days was spent on this annual audit. One auditor day was spent on the office and field portions, another interviewing stakeholders and reviewing documents, and finally one day to write the report.

2.2 Assessment Personnel

Kyle Meister, M.F. – Lead auditor, Scientific Certification Systems. Mr. Meister is a Certification Forester with Scientific Certification Systems. Recent FSC FM audits include True North Certified Forestland Network, St. John’s Abbey, Collins Kane Hardwood Division, Main International, Humboldt Redwood Company, Cikel Brasil Verde – Rio Capim, Mendocino Redwood Company’s Resource Manager Program, and Trout Mountain Forestry. He holds a B.S. in Natural Resource Ecology and Management and a B.A. in Spanish from the University of Michigan. He also has a Master of Forestry degree from the Yale School of Forestry and Environmental Studies. He has experience as an environmental educator and natural resource consultant in the U.S., Mexico, Ecuador, Costa Rica, Colombia, and Brazil.

2.3 Assessment Process

The scope of the 2009 annual audit, as with all annual audits, included the following activities: document review, field and office visits, and interviews with management personnel and, as appropriate, outside stakeholders.

CLF personnel present for the annual audit included Lee Fledderjohann, Resource Manager and Travis Erickson, RPF. The field portion of the audit focused on the Fremont FMU and included active and recent timber harvests, as well as selected areas of interest in response to 2007 CARs.

November 19, 2009

- Opening meeting at CLF offices (8:00 am)
 - Review of open CARs
 - Review of inventory program, non-timber sources of income, and utilization specifications
 - Finalization of field itinerary
- Site visits (9:30 am – 3:30 pm)
 - Wambies Sale – marked commercial thinning and operator select thinning of 60 yr. old Ponderosa pine stand
 - Retention of legacy big trees (older age class)
 - Marked thinning to capture trees killed by insects, prevent future outbreaks, and favor vigorous trees
 - Manzanita ground cover maintained to keep White fir competition down
 - Saw logs used to 5” tip, chip material used to 2” tip
 - Operator select thinning – logger given parameters for spacing and leave trees (50% live crown ratio), which were followed (Fig. 1, appendix).
 - Packston Pine Sale – variable retention employing sanitation salvage and thinning techniques (Fig. 2, appendix)
 - Retention of large Ponderosa pine, White fir, and some Western white pine; downed woody debris, snag and green snag retention (Fig. 3, appendix.)

- Lodgepole pine to be removed by hand crew
 - Camas Median Sale – seedtree-shelterwood and commercial thinning, 2 acre large Ponderosa pine HCVF (see Fig. 4 (note: photo is not from this HCVF), appendix).
 - Lost 10-20% or pre-harvest BA to insects
 - 50% cost share with ODF
 - Aspen restoration experimentation near seasonal draw
 - Leave 2 snags > 18” per acre
 - Mountain Mahogany Reserve Area (Camas Median)
 - Shallow soil site
 - Mountain Mahogany saved for wildlife cover and food
 - Some Ponderosa pine removed to provide light
- Review of written harvest prescriptions and Rosa Creek documentation (3:30 pm – 4:00 pm)

November 20, 2009

- Review of CLF’s efforts in outreach to Indigenous Peoples
- Calls to stakeholders
 - USFS Grazing Program
 - Indigenous Peoples
 - Contractors
- Summary of findings, issuance of CARs and OBSs, and closing meeting

2.4 Status of Corrective Action Requests

Background/Justification: CLF is using the January 2007 version of the “Oregon Department of Forestry Forest Practice Administrative Rules and Forest Practices Act.” The latest version includes the most recent changes to the FPA rules effective as of July 1, 2008.	
CAR 2008.1	CLF shall evaluate upcoming timber sales to make sure that they comply with any changes to the FPA rules and ensure that all future sales do as well. To avoid problems with this in the future, CLF should develop a system to stay up to date on changes to applicable forest rules and laws.
Deadline	2009 Annual Audit
Reference	<i>FSC Criterion 1.1a</i>
<p>CLF Response May 14, 2009: CLF sent SCS a copy of the updated FPA Rulebook (dated July 2008). This shows that CLF has access to the updated rules. However, the question still remains as to whether any changes in the FPA rules will affect upcoming timber sales. Furthermore, CLF has yet to describe its method for staying up to date on changes in applicable forest rules and laws.</p> <p>SCS Comment, June 2009: The question still remains as to whether any changes in the FPA rules will affect upcoming timber sales. Furthermore, CLF has yet to describe its method for staying up to date on changes in applicable forest rules and laws. This CAR remains open. CLF still has until the annual audit to finish formulating a response.</p> <p>CLF Response November 19, 2009: We are in direct contact with stewardship forester at ODF. Mr. Fledderjohann is also on the ODF board. We shall maintain contact with stewardship forester regarding new forest practice rules in Oregon. As there may be</p>	

restructuring in ODF during the coming year, we will maintain contact with both the Klamath District, Lake Unit Stewardship Forester and Unit Forester.

SCS Comment, November, 2009: SCS contacted the ODF stewardship forester to gain to more information on this CAR. The stewardship forester confirmed that CLF maintains regular contact with ODF throughout the year. In a typical year with CLF, ODF reviews operations notices and conducts occasional site visits. All notifications are reviewed by ODF. The ODF office in Salem indicates all changes to Oregon Forest Practice Rules, most of which currently have little or no impact on southeastern Oregon’s Klamath District. In fact, most of the new rules provide for greater flexibility in this district. For example, ODF has more flexibility to work with landowners to place large woody debris in streams.

CLF’s system for maintaining for staying up to date with changes to rules is sufficient. The fact that CLF maintains contact with two levels of ODF management shows that it is thinking strategically about future changes in ODF organizational structure. ODF confirmed that CLF’s timber sales comply with state forest practice rules.

Disposition of this CAR: This CAR is closed.

Background/Justification: CLF has no formal system for identifying and prioritizing monitoring needs as indicated under FSC Principle 8.

CAR 2008.2	Collins-Lakeview must implement a formal system for identifying and prioritizing monitoring needs. Examples may include, but are not limited to, post-salvage monitoring for regeneration and invasive species.
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Deadline	2009 Annual Audit
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Reference	<i>FSC Indicators 8.4a</i>
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CLF Response May 14, 2009: CLF has produced a document, “Monitoring and Adaptive Management,” that details its monitoring priorities and objectives of adaptive management. Its monitoring program includes developments in the areas of silviculture, biology, planning, harvesting systems, inventory systems, and forest health. CLF has provided a subsection of monitoring priorities that include formal and informal assessments. These include air quality, cultural resources, forest health (e.g., aerial surveys, insect traps, timber inventory, permanent plots), grazing (e.g., photo points), property lines, recreation and scenic resources, soils, special forest products, threatened, endangered and state candidate plants, timber (acres, volume cut, harvest type, plantings by species, site preparation type and acreage, acres of pre-commercial and chip thinning, stand inventory, permanent plots, and stocking surveys), water resources, and wildlife and fish habitat.

SCS Comment, June 2009: CLF has also produced an “Invasives Management Plan” that includes monitoring and adaptive management objectives in the control of problematic invasive plant species of southeastern Oregon. See also REC 2008.2

Disposition of this CAR: This CAR is closed. Evidence of use of the needs identified in CLF’s documents may be checked in future audits.

Background/Justification: CLF’s response to CAR 2007.4 contains a definition of Type 3 old-growth stands that is difficult to interpret. Within the response, there is a lack of an operational definition with criteria that can be measured and/or audited. This makes it

difficult to provide clear guidance in the field to managers as to what constitutes a Type 3 old-growth stand.

CAR 2008.3	CLF shall develop a definition of Type 3 old-growth stands that reflects the observations made in CAR 2007.4 and characteristics of the 2,000 acres that it has identified in the field.
Deadline	2009 Annual Audit
Reference	<i>FSC Criterion 6.3.d.3</i>

CLF Response May 14, 2009 and auditor comment: CLF has defined the Type 3 Old Growth stand definition as follows: “Type 3 stand must have trees that are at least 350 years old. These stands must exhibit at least 30% decadence and have at a minimum 50% of the forest floor covered with large old growth logs in the final stages of decay. The understory vegetation must be of a diverse nature developed from numerous openings in the canopy developed from senescence.”

“In each harvest operation, the number of these trees is determined from on-site inspections and a judgment is made as to how many are to be harvested or retained. The percentage of old-growth trees harvested in each cutting cycle ranges from 25 – 75% depending upon their disposition and relative numbers. The fewer the initial number, the more likely they are to be retained. All Type 3 stands that will be subject to harvest activity will have the timber marking reviewed prior to harvest operations and they will receive post-harvest inventory surveys to ensure they will continue to meet the definition after the entry. CLF contains approximately 2,000 acres of Type 3 stands.”

SCS Comment, June 2009: CLF has taken a major step in coming closer to a Type 3 old growth definition. However, CLF’s definition needs some more refinement. What is the rationale for having trees that are at least 350 years old? How many trees per acre or number of trees averaged over a certain amount of contiguous acres determine a Type 3 old growth stand? How is decadence defined and how is it qualified in this context? How is decay qualified? Are there decay class guidelines? How does CLF evaluate understory vegetation and its diversity?

Excerpts from CLF Response November 19, 2009: CLF updated its description of Type 3 old-growth stands. Type 3 old-growth trees must be at least 300 years old and exhibit at least 30% decadence (slowed growth, open limb structure, flattened tops) and have at a minimum 50% of the forest floor covered with large old-growth logs in the final stages of decay. CLF bases its age of Type 3 old-growth on several pieces of peer-reviewed literature. Ponderosa pine has a large geographic range, so the definitions of old-growth vary among location, authors, and government agencies. In southern Oregon, the mean age of ponderosa pine in two mixed conifer stands ranged from 230 to 315 years, with the oldest tree at over 400 years of age (Agee 2003; Perrakis and Agee, 2006). In Montana, the mean age of ponderosa pine in old-growth mixed conifer stands ranged from 179 to 374 years with the oldest tree at over 450 years (Arno *et al.*, 1995, 1997).

Most people think of big trees as old-growth or any forest originated pre-Euro-American settlement, but we prefer a more physiologically based definition. Ponderosa pine stands begin to change their growth and stand structure at around 200 years of age (Kaufmann

1996). By the time dominant trees are 300-400 years old, most stands have developed old-growth characteristics, including coarse woody debris, snags, a variety of tree ages and sizes, dominant trees at the maximum size for the site conditions, and a disturbance equilibrium (Kaufmann *et al.* 1992). As the research shows, there are various ages in which the trees start to exhibit old-growth characteristics. In southern Oregon/northern California, the use of 300 years old for trees on the CLF for Type 3 does fit in with the acceptable age for old-growth trees.

To determine whether or not a stand qualifies for a Type 3 status, there shall be at least 30 trees per acre that meet the above definition. The overall contiguous stand acres shall be at least 100 acres. Stands of this size maintain internal structure that is necessary to provide refugia, connectivity and operational considerations. This also mimics what the dominant disturbance regime of the area is. We observed fire disturbance data over the past 35 years. This time span is actually too short to determine what long term disturbances are from forest fires. If we have determined that the average age of Old-growth trees to be 300 years, the same time span must be looked at to determine what the average disturbance area would be for the same area. However, we do not have that type of data set available to get to this answer. To get to some sort of answer on what the minimum acreage should be for a Type 3 stand, our limited data set is used to come up with 236 acres. To be on the conservative side, we reduced the 236 acres to 100 acres. By reducing the acreage parameter the probability of meeting specific stand and tree characteristics will increase.

When we observe these Type 3 stands in the forest, decadence plays a major role in the overall ecosystem function of the stand. We define decadence as: evident dead, broken, or deformed tops and/or bole or root rot. These physical characteristics are visually evident in the stand, thus the determination of whether or not the stand exhibits these characteristics, a visual inventory can be made quite quickly.

Where decadence is looking at the standing trees, decay is on the forest floor. We define decay as the process of decomposition through fungi, bacteria and wood-eating insects. These organisms all decompose dead plants and animals, helping to make the soil rich and fertile. Decaying matter serves as a step in the cycle of death and renewal in a forest. Nutrients released into the soil are then taken up by the roots of living plants. The cycle of forest life continues.

Decay classes refer to the progressive change in solidity, integrity of shape and characteristics of the log surface that occur as a result of the decay process. We don't determine decay, we just observe it. Our general decay class guides are hard, soft and detritus.

An ocular estimate is taken to evaluate the understory vegetation and its diversity. Generally in stands that have not been entered for a long time, the understory vegetation will tend to become dense and very woody. Just as the conifers go through seral stages so does the understory vegetation. Thus in this ecosystem in which we have excluded fire, we will not see a park like understory. More than likely manzanita, snowbrush, ceanothus and other woody vegetation will be occupying space in the understory that is not occupied by trees (or

tree crowns).

Type 3 stands must have overstory trees that are at least 300 years old. These stands must exhibit at least 30% decadence in the overstory and have at a minimum 50% of the forest floor covered with large Old-growth logs in the final stages of decay. The understory vegetation should be of a diverse nature and the minimum stand size will be 100 acres.

SCS Comment, November 2009: CLF has addressed the questions from the comments in May and its qualitative guidelines allow for forest managers to make fair judgments of Type 3 old-growth conditions.

Disposition of this CAR: This CAR is closed.

Status of Recommendations

Background/Justification: Near one of the burn piles on the way to visit a Type 3 stand, a large puddle had formed that was almost half the width of the road in size.	
REC 2008.1	Since this area is near an active harvest site, this poorly drained area should be fixed before it becomes a bigger problem.
Reference	<i>FSC Indicator 6.5.j</i>
CLF Response	This area is currently not impacting soil or water courses. Operations were closed soon after the audit due to it being the end of harvest season. During next year's harvest activities, road maintenance crews will be coming through that area and amend this situation.
Disposition of REC	This REC is closed.

Background/Justification: There is no written action plan and priority list for treating invasive exotic plant species.	
REC 2008.2	CLF should prepare and implement a program for identifying, prioritizing, and treating invasive exotic plants in anticipation of the soon-to-be-revised Pacific Coast Standards, under which this would result in a CAR.
Reference	<i>FSC Indicator 6.9.b</i>
CLF Response May 14, 2009 and auditor comment: CLF has prepared a document titled, "Invasives Management Plan," which cites information from various intermountain state university extension publications and guidelines, and peer-reviewed journal articles. CLF prioritizes invasive species to manage based on weed management guidelines from the State of Oregon's Department of Agriculture. CLF has included monitoring and adaptive management objectives for the control of invasive species in order to assess the effectiveness of management approaches and plan new and/or modified strategies. CLF details the intensity of monitoring and control for invasive species. It also has listed riparian/wetlands and roads/landings as key areas to monitor and control for invasives.	
We had more invasive plants than we had previously thought. We have started mapping of invasive species.	

CLF has put together a very succinct and clearly defined management plan for controlling and monitoring invasive species.

Disposition of this recommendation: This **REC is closed**. SCS looks forward to observing CLF's use of this tool in the future.

2.5 General Observations

According to Collins Lakeview forest manager, Travis Erickson, Lakeview is town where, "People care about you and what you do." A local logging contractor said that, "Collins is a wonderful family that has helped this town [to] grow. They are still open at the mill and keeping us busy. We do good work on their land and they take care of us. We are proud of our work and their land looks good. The [Collins] family even gives out turkeys and food to contractors at Christmas." The fact that local contractors and employees refer to the Collins Company as a family shows the impact that it has on Lakeview, OR and surrounding towns.

CLF has improved its documentation system this past year and has stayed on top of their cooperative work with the US Forest Service, Oregon Department of Forestry, and regional watershed conservation partners. Changing timber markets and evolving markets for "green-certified" materials are likely to cause greater need for adaptation and innovation.

CLF has several challenges in the coming year, including the assumption of all aspects of the grazing program on one grazing allotment, White Rock. Achieving a balance of ecological and economic considerations in rangeland management will likely require a few seasons to develop and master. CLF already has been working closely with Oregon State University Cooperative Extension in this endeavor and should make substantial progress during the coming year.

2.6 New Corrective Action Requests and Observations

Nonconformity: CLF's management plan has not incorporated landscape-level considerations within the ownership and among adjacent and nearby lands (e.g., major bodies of water, critical habitats, and riparian corridors shared with adjacent ownerships). Landscape-level planning will require more time to be effectively implemented in coordination with adjacent forest ownerships.

In response to CAR 2007.6, which was upgraded to Major as a result of the 2008 annual audit, CLF held a Cumulative Impacts meeting with local offices of the U.S. Forest Service on February 24, 2009 to discuss wildlife population data sharing, forest structure across the FMU, wildfire risk and management, recreational issues, forest product utilization, and economic limitations.

Excerpt from the meeting's summary document:

As the USFS is capable of producing specialized wildlife analysis we have looked to their personnel for additional information and data to assist the Collins Resource staff in planning project that will increase habitat or mitigate for significant habitat alteration. The District is quite willing to continue this relationship, especially in the form of data sharing. Management of our timberlands has not significantly impacted forest structure within the

FMA. The Collins ownership is a small portion of the FMU thus reducing any potential cumulative impacts to a non-significant level.

Risk to catastrophic wildfire is a significant threat within the FMU. The Ranger felt that fires originating on the numerous untreated federal stands have the highest probability of impacting the FMU as their stands are typified by high density spatially homogeneous structure. Any stand modification that can be conducted on the Collins timberlands will further buffer our stands from catastrophic wildfire.

Recreational uses on the FMU are primarily limited to hiking, hunting, fishing, and camping. The USFS and the Collins Lakeview Forest permit or allow all of these activities on the FMU. Limited staffing and funding on the District has and will impact further recreational activities on the FMU. As the Collins primary goal for this forest ownership is forest product production and recreational opportunities do not further the primary goal, thus the current types and level of activity will continue. Increased recreational demands on the FMU are not likely to change do to the proximity of large population centers and limited unique natural resources.

Development of further fiber utilization in the form of a biomass energy facility will further stand management on the FMU on both federal forestlands and our forestlands. Both parties have delineated areas and determined volume of fiber that would assist in supporting the supply needs for this type of facility.

Due to limited secondary or “waste” fiber facility proximity to the FMU the economic viability of numerous treatment options is cost prohibitive. Current market trends will further limit full utilization of forest products.

As a whole the Ranger stated that he wished that they had the liberty to manage the District similar to how we manage Collins Lakeview Forest.

CAR 2009.1	CLF shall incorporate the results of the Cumulative Impacts Meetings (e.g., Wildlife population data sharing, Forest structure across the FMU, Wildfire risk and management, Recreational issues, Forest product utilization, Economic limitations, and any other important topics should the need arise) and other related information into an augment of the management plan that details landscape level considerations.
Deadline	Annual Audit 2010
Reference	FSC Indicator 7.1.b.6

Observations

Background/Justification: Insect mortality has pushed some stands scheduled for lighter treatments into sanitation-salvage, thinnings and shelterwood-seedtree treatments to secure regeneration and reduce insect populations. CLF’s allowable annual cut (AAC) is 8 million board feet. The ten year rolling average from 1999 to 2009 is 8.546 million board feet if one includes sanitation-salvage treatments due to catastrophic fire in 2007 and bark-beetle kill in 2008. Excluding these sanitation-salvage treatments, the ten year rolling average for the same interval is 7.137 million board feet.

In the 2008 “State of the Forest: Collins Lakeview” report, CLF identified 26,000 acres of overstocked stands. According to the report: “... we are in need of in a very timely manner getting these stands under a stocking level control and into a productive state. Time is of the

essence for the Lodgepole Pine salvage and the Mixed species-small sawlog stands. Doing this at a clip of 4,000 acres per year (6.5 years to complete) we are looking at a harvest of approximately 16,000 Mbf annually in the next seven years This equates to a total of 25% of the existing standing inventory.”	
OBS 2009.1	CLF should consider recalculating its AAC by taking into account its analysis on overstocked stands to better reflect the projected volumes harvested.
Reference	<i>FSC Indicator 5.6.b.</i>

<p>Background/Justification: Federal management of grazing on one mostly private allotment, White Rock, will cease during 2010, which means that CLF will assume control of all aspects of rangeland management on this particular allotment. CLF is taking a “crash course” in grazing this coming year with the assistance of OSU Cooperative Extension. By CLF’s own admission, several fences are in need of repair on grazing allotments. Indeed, this is going to be a big year for the restructuring CLF’s grazing program.</p> <p>Grazing is one of the few sources of non-timber income that CLF has. If managed well, grazing provides steady annual income over the long-term and is compatible ecologically with the management of grassland vegetation. The key to achieving a successful, long-term grazing operation is dependent on several economic and ecological factors, such as setting optimal grazing rotations, maintaining fences, occasional installation of temporary grazing exclusion devices, and arranging financially competitive grazing leases.</p> <p>CLF has been working consistently with ODF&W, ODOT, and local environmental stakeholders to remedy 1-2 miles of stream with a few head-cuts on the Rosa Creek drainage, which were initially caused by culvert installation and grading during the construction of a local highway. According to ODF&W, the rehabilitation of the Rosa Creek drainage for watershed protection and rangeland management will involve re-grading of the culverts, construction of step pools, installation of fencing, re-vegetation, and well-timed grazing.</p> <p>Besides avoiding poor installation of drainage BMPs, there may be other lessons that CLF can take away from the rehabilitation of Rosa Creek. For example, the timing of any control of competing vegetation, re-vegetation, and grazing on the drainage may have broader applications to other grazing allotments on CLF. This is just an example; CLF may have or may have yet to identify other lessons learned on Rosa Creek rehabilitation efforts related to rangeland management.</p> <p>CLF’s collaborative work with state agencies and environmental stakeholders on Rosa Creek may present further opportunities for cooperation.</p>	
OBS 2009.2	CLF should consider the lessons of the Rosa Creek issue in designing a grazing program that balances both economic and ecological concerns in order to protect the species composition and viability of riparian vegetation, minimize stream bank erosion, and establish grazing rotations that allow for annual sources of income in the long-term.
Reference	<i>FSC Indicator 6.5.t.</i>

2.7 General Conclusions of the Annual Audit

Based upon information gathered through site visits, interviews, and document reviews, the SCS audit team concludes that CLF's management of Collins Pine holdings in, Lakeview, OR and Modoc County, CA continues to be in overall compliance with the FSC Principles and Criteria, as elaborated by the FSC US Pacific Coast Regional Guidelines. That is, and while there remain aspects of the management program that are deficient relative to the standard of certification, the SCS audit team has concluded from this annual audit that CLF's forest management program is in general conformance with FSC Principles 1 through 9 (Principle 10 is not applicable as CLF's operations are classified as "natural forest management" under the FSC definitions). As such, continuation of the certification is warranted, subject to the ongoing progress in closing out the one open CARs and 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.