

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

Trout Mountain Forestry

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

**CERTIFICATION REGISTRATION NUMBER
SCS-FM/COC-00062G**

Submitted to:

**Trout Mountain Forestry
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Portland OR 97209**

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**Date of Field Audit:
November 18 - November 20, 2008**

Date of Report: January 21, 2009

Certified: Date of Certificate: January 21, 2009

By:

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Organization of the Report

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

FOREWORD

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by Trout Mountain Forestry to conduct a certification re-evaluation of its group certification program. 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.

On November 18, 2008, an interdisciplinary team of natural resource specialists was empanelled by SCS to conduct the evaluation. The team collected and analyzed written materials, conducted interviews and completed a 2.5 day field and office audit of the subject property as part of the certification evaluation. Upon completion of the fact-finding phase of the evaluation, the team determined conformance to the 56 FSC Criteria in order to determine whether award of certification was warranted.

This report is issued in support of a recommendation to award FSC-endorsed certification to Trout Mountain Forestry (TMF), for the management of its group certification program. 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	Trout Mountain Forestry
Contact person	Barry Sims
Address	721 NW 9 th Avenue, Suite 228, Portland, OR 97209
Telephone	503-445-1291
Fax	503-517-9990
E-mail	barry@troutmountain.com
Certificate Number	SCS-FM/COC-00062G
Certificate/Expiration Date	1/21/2009 – 1/21/2014
Certificate Type	Group
Group Members <i>if applicable</i>	69 Group Members
Number of FMU's <i>if applicable</i>	69
Number of FMUs in scope that are	
less than 100 ha in area	48
100 - 1000 ha in area	19
1000 - 10 000 ha in area	2
more than 10 000 ha in area	0
Location of certified forest area	
Latitude	122°40'55"W
Longitude	45°31'12"N
Forest zone	Temperate
Total forest area in scope of certificate which is included in FMUs that:	
are less than 100 ha in area	1921 ha
are between 100 ha and 1000 ha in area	5029 ha
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs	6950 ha
Total forest area in scope of certificate which is:	
privately managed ^[1]	7,126 ha
state managed	3,368 ha
community managed ^[2]	1,130 ha
Number of forest workers (including contractors) working in forest within scope of certificate	3 full time, 1 part time, and numerous contractors
Area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	1,773 ha
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Area of forest classified as 'high conservation value forest'	2,926

^[1] The category of 'private management' includes state owned forests that are leased to private companies for management, e.g. through a concession system.

^[2] A community managed forest management unit is one in which the management and use of the forest and tree resources is controlled by local communities.

List of high conservation values present ^[3]	HCV 1-6
Chemical pesticides used	Velpar/Oust, Accord/Atrazine, Garlon, Transline
Total area of production forest (i.e. forest from which timber may be harvested)	11,624 ha
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]	<i>Not reported</i>
Area of production forest regenerated primarily by natural regeneration	<i>Not reported</i>
List of main commercial timber and non-timber species included in scope of certificate (botanical name and common trade name)	Grand fir (<i>Abies grandis</i>), Bigleaf maple (<i>Acer macrophyllum</i>), Red alder (<i>Alnus rubra</i>), Incense-cedar (<i>Libocedrus decurrens</i>), Douglas-fir (<i>Pseudotsuga menziesii</i>), Oregon white oak (<i>Quercus garryana</i>), Western redcedar (<i>Thuja plicata</i>), Western Hemlock (<i>Tsuga heterophylla</i>).
Approximate annual allowable cut (AAC) of commercial timber	5,000,000 board feet
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	None
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.)	Logs in the rough, sawn timber

Conversion Table English Units to Metric Units

Length Conversion Factors

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

Area Conversion Factors

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

Volume Conversion Factors

Volume

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

^[3] High conservation values should be classified following the numbering system given in the ProForest High Conservation Value Forest Toolkit (2003) available at www.ProForest.net

^[4] The area is the *total* area being regenerated primarily by planting, *not* the area which is replanted annually. NB this area may be different to the area defined as a 'plantation' for the purpose of calculating the Annual Accreditation Fee (AAF) or for other purposes.

1 acre	= 0.404686 hectares
1,000 acres	= 404.686 hectares
1 board foot	= 0.00348 cubic meters
1,000 board feet	= 3.48 cubic meters
1 cubic foot	= 0.028317 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 a private enterprise located in the States of Oregon and Washington, management of TMF is subject to a host of local, state and federal regulations. The principal regulations of greatest relevance to forest managers in this area are associated with the following statutes:

Pertinent Regulations at the Federal Level:

Endangered Species Act
 Clean Water Act (Section 404 wetland protection)
 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:

Oregon Forest Practices Regulations administered by the Oregon Department of Forestry
 Oregon Endangered Species Act
 The Oregon Drinking Water Quality Act of 1981
 Washington Forest Practices Regulations administered by the Washington Department of Natural Resources

Regulatory Context for State and Local Regulations:

Oregon and Washington have forest practices acts authorizing the development of regulations of forest practices in their respective states. The acts serve as statutory frameworks that include rules, technical assistance, and monitoring. Forest practices regulations typically cover the establishment, management and harvest of forest tree species, including such activities as road construction and maintenance, treatment of slash, reforestation, harvesting, and use of pesticides and fertilizers. The regulations primarily address issues raised in even-age silviculture, such as the need to establish a viable plantation of young trees after final harvest of the previous stand. For an operation primarily utilizing uneven-age silvicultural techniques, the regulations are most pertinent as they relate to road construction and maintenance, protection of riparian areas, and addressing wildlife habitat requirements.

1.2.1 Environmental Context

The TMF group is comprised of private, public, and community lands in the Pacific Coastal Range of Oregon and Washington, mostly within a 2-3 drive from Portland, OR. Important forest types include moist conifer sites, such as those containing the commercial timber species Douglas-fir and Western redcedar. However, local variations in soil, topography and climate, as well as water courses and wetlands, give rise to a number of other important ecological values. One of the often overlooked ecosystems in the region is the Oregon white oak savannah, which has received less attention in the popular media than charismatic conifers. These ecosystems historically consisted of relatively few trees with open grassland meadows in between that supported many different wildlife species, including ground nesting birds. Many forest types of the region are also important for the management of wildlife game species, fish-bearing streams and water quality.

Forests evaluated in the field audit portion of the re-certification include a Camp Mountaindale Girl Scout Camp, the Cerro Gordo community forest, the Zena forest in the Willamette Valley, and private forests of Gahr, Lemelson, Kimball, Hayes and Tilbury. Trout Mountain Forest managers are working on the Tilbury and Zena properties to restore portions of the oak savannah ecosystem through timber harvesting, mechanical and chemical control of invasive plant species, and prescribed burns. The Tilbury and other properties contain mostly dominant conifer tree species with bigleaf maple, madrone or chinkapin as minor subcanopy components.

1.2.2 Socioeconomic Context

TMF manages forests for many types of landowners and thus must meet a variety of management objectives depending on those of the landowner, in addition to complying with relevant laws and FSC principles and criteria. Most lands under Trout Mountain Management are located north of Eugene in the Willamette Valley or along the Oregon Coast and Cascade Ranges to the west and east of the valley, respectively. These include private, public, and community owned forests.

This region can be characterized as resource dependent, with high levels of direct and indirect employment related to the timber, agricultural, and landscaping industries. Fluctuating timber markets, agriculture, tree farms supplying horticultural varieties on a national scale, expanding urban development, changing attitudes about forests, and water resource issues affect the local population's demands on forest ecosystems. Within the City of Portland, a number of environmental NGOs and for profit environmental service industries have emerged in recent years, which have started to respond to changing demands on forests both regionally and nationally.

During the current market decline in timber products, TMF has been able to maintain steady sales of timber through supplying FSC-certified timber to local, FSC Chain-of-Custody certified mills. Some of these mills offer special services, such as custom cutting, which has allowed them to stay afloat during these difficult times.

1.3 Forest Management Enterprise

1.3.1 Land Use

With the exception of areas in permanent protection status, such as parklands, the region was heavily logged over at the turn of the last century. In the intervening 100 years, largely even-aged second and third growth forests have grown back throughout the region. Oak savannahs were cleared for agriculture or used as cattle pasture. Introduced, non-native hawthorn (*Crataegus* sp.) and Scotch broom (*Cytisus scoparius*) are problematic on oak savannahs and neighboring conifer forests in stand re-initiation phase. Exclusion of fire on oak savannahs has led to a higher density of oak trees than that under historical conditions.

TMF members, depending principally on the ownership type, have many different objectives. These include managing for biodiversity, compositional complexity, water quality, outdoor recreation, wildlife, and identification and demarcation of high conservation forests and protected areas. Some members have out-of-scope farmland, pasture, and residential property that affect management decisions, such as road maintenance and whether or not to use chemical control to address invasive plant species.

1.3.2 Partial Certification- Land Outside of Certification Scope

As a private consulting firm, TMF manages other properties outside the scope of the group scheme. Those properties are owned and controlled by private individuals who determine the management objectives for their properties. All activities occurring on individual properties are managed as individual projects and there is little risk that the forest products generated as result of those management activities could become confused with products from certified lands. TMF does encourage non-members to join the certified pool when goals of those property owners are consistent with FSC.

1.4 Management Plan

1.4.1 Management Objectives

The objectives of TMF's forest management group certification system are¹:

Purposes of the Trout Mountain Forestry Group Certification Program:

- To allow landowners to economically gain access to Forest Stewardship Council (FSC) certification and certified forest product markets.
- To support landowners personally involved in their property's forest management with expert advice about sustainable forest management and FSC certification.
- To encourage the processing and marketing of FSC timber by increasing the FSC certified forestland base and the amount of available FSC product.

¹ A full copy of Trout Mountain Forestry's management plan is available on request by writing to or calling Trout Mountain Forestry, 721 NW 9th Avenue, Suite 228, Portland OR 97209, phone: 503-445-1291, fax: 503-517-9990.

Group Manager Role and Responsibilities (Trout Mountain Forestry)

- Writes management plans, or reviews client-written plans for every group member.
- Plans are rewritten or updated every ten years.
- Directly supervises and manages harvests, and is responsible for record keeping and monitoring requirements associated with FSC certification.
- Markets all forest products and strives to sell logs to FSC processors, when price and opportunity allow.
- Informs members of relevant Correction Action Requests (CARs) that apply to the Certification Group or the member's property.
- Keeps members apprised of any changes in group requirements or group certification standards. Some clients do meet all the criteria for the Trout Mountain Forestry Certified Group, and are not enrolled. Trout Mountain Forestry encourages those clients to join the Group whenever appropriate.

Group Member Requirements and Responsibilities (Clients)

- Enter into a long-term relationship with Trout Mountain Forestry for the purpose of managing the forest for productivity, stewardship, and connecting to the community of forest products users through forest certification.
- Employ Trout Mountain Forestry as their forest manager to provide the full suite of consulting services, and agree to abide by the forest certification standards to which the group is committed.
- Understand that forest certification requires openness and some public access to records, both operational and financial, as advised by Trout Mountain Forestry.

1.4.2 Forest Composition

Ecosystem types include Douglas-fir/Western redcedar dominated forests, and oak savannah. Major commercial species include Douglas-fir, hemlock, and Western redcedar. Minor commercial timber species include Incense-cedar, Oregon white oak, Grand fir, Pacific madrone, and Bigleaf maple.

1.4.3 Silvicultural Systems

TMF mainly employs uneven-aged single tree and group selection silvicultural systems based on ecosystem dynamics (e.g., stand development, tree species diversity, the presence of clumps or gaps, etc.). Forest management seeks to mimic the size, type, and frequency of disturbances found in natural forests. Trout Mountain avoids the use of clearcuts, which are not to exceed 15 acres in size unless extenuating circumstances warrant their use (e.g., fire and insect outbreaks). Trout Mountain strives for a diversity of species and age classes and ecological values, such as wildlife and water management. Seedlings and saplings comprise at least 10% of the forest and every 20 years enough regeneration is secured to maintain this balance. Harvest rates do not exceed growth during any 10 year period. Harvest prescriptions are also tailored to non-industrial landowner objectives. As such, visual impact plays an important role in the design and execution of management activities.

1.4.4 Management Systems

Under this group certification system, Trout Mountain Forestry is the Group Entity or Resource Manager (RM). RMs who meet eligibility criteria and sign a contract are then registered as participating RMs and can enroll forest ownerships under their management into the group certification system. TMF enrolls lands under private and municipal ownership who in turn must sign a contract agreeing to the requirements of the system.

TMF offers membership to its clients and to associate members. Clients employ TMF to write management plans and conduct forest planning, harvest layout and administration, log marketing, site visits, and other services. Associate members pay TMF an annual fee to be members of its FSC group certification system, but have not hired TMF to manage their forest. TMF reviews management plans and monitors timber sales of associate members in order to ensure that they meet FSC standards.

As the RM, TMF is responsible for establishing and enforcing rules for admission into or resignation/expulsion from the group certification system. It also must implement a system to monitor compliance with the certification standard (FSC US Pacific Coast Standard). TMF is directly accountable to the Certification Body, Scientific Certification Systems, for all activities on member properties.

1.4.5 Monitoring System

Each client receives a review of its current management plan(s) as part of the entry assessment. TMF foresters conduct this review with the landowner during a site visit. TMF and the landowner set specific performance goals, and discuss how they will assess their progress towards these goals and how to adapt the management approach when necessary. Both progress towards achieving management objectives and the performance of the forest manager will be assessed every 10 years. Each FMU's management plan is to be updated and revised every 10 years.

Monitoring includes data collection, such as tree inventory. FMU-wide timber inventory is to be conducted every 10 years using the same protocols (and contractor, if applicable) whenever possible.

TMF measures the following indicators for assessment and monitoring:

1. Regeneration of at least 200 trees per acre is naturally established and/or planted when stand-level stocking of commercial species falls below 80 sq.ft./ac. basal area. Measure overstory basal area and preexisting seedling numbers in harvest planning walk-through.
2. Property-wide coarse woody debris (CWD) levels of at least 20 tons per acre (>4") are maintained. Monitored by sampling during periodic property inventory; visually estimated stand level CWD levels during harvest planning walkthrough.
3. Wildlife tree, snag, and legacy tree averages meet targets at the stand level (1–2 wildlife trees/ac, 3–4 snags/ac, 4 legacy trees/ac; at least half conifer). New recruits are marked as

- needed. Monitored by sampling during periodic property inventory; visually estimated presence during harvest planning walk-through.
4. Skid trails, roads and landings cover less than 10% of the forest floor; skid trails are at least 150 ft. apart (average). Monitored by visual assessment during harvesting.
 5. Erosion control devices are installed correctly, and effectively shed water to prevent erosion. Monitored at post-harvest walk-through.
 6. Timber volume growth is maintained at 8% or more for young stands, 4–6% as forests mature (poor sites and stressed stands will not perform as well). Monitored with systematic inventory at 10-year intervals; growth response noted during harvest planning walk-through.
 7. Understory vegetation, natural regeneration, and ground cover are dominated by native species of desired groups; invasive exotics are reduced in numbers. Monitored by sampling during periodic property inventory; presence visually estimated during walk-throughs.

1.4.6 Estimate of Maximum Sustainable Yield (MSY)

Harvesting on group member properties is very intermittent, which is typical of non-industrial forest ownerships.

TMF employs the following standards in its management plans to estimate growth and yield:

1. The plan is based on a statistically relevant inventory of the timber resource, as well as assessments of other forest values and functions.
2. Management perpetuates or enhances the full range of forest values and functions, as possible.
3. The timber inventory and management plan is updated every 10-15 years.
4. The management plan includes:
 - a. a summary of management goals and policies
 - b. 20-year management priorities, including harvest volume and income/cost estimates
 - c. supporting information (forest type map, aerial photo, forest inventory summary, wildlife and biological resources, growth and yield projections)

Based upon a review of harvesting records of members, average volume per acre is increasing and the general vigor of managed stands are demonstrably increasing in response to TMF's prescriptions. However, the Cerro Gordo property has experienced considerable insect damage, to which TMF's response has been to implement salvage operations to remove infested trees and retain vigorous ones as a seed source. TMF and Cerro Gordo also have carried out mechanical control of Himalayan blackberry (*Rubus discolor*) and enrichment tree plantings, using seedlings from local seed sources, to increase understory tree diversity and reduce soil erosion. Nevertheless, stocking is just over 400 MBF lower than the maximum level achieved in the year 2000. The auditors noted that harvest levels have decreased during the past two harvest cycles, due to a decrease in insect damage, poor timber markets or both. Stocking levels are expected to increase next year. Auditors will continue to assess the situation on this property to ensure that harvests do not exceed MSY over a 10 year average.

1.4.7 Estimated, Current and Projected Production

See section 1.4.6.

1.4.8 Chemical Pesticide Use

TMF uses a combination of mechanical control and chemical herbicides on some of its group members' properties to control competing vegetation, primarily invasive species such as Himalayan blackberry and Scotch broom. On properties where the use of chemical herbicides is prohibited, TMF only practices mechanical control. TMF has been keeping an eye on other invasive species control options.

For more information on TMF's chemical herbicide use, see "Chemical Pesticides Used" in the table on page 7 and CAR 2008.6.

1.5 SLIMF Qualifications

All but two of the properties in the group are less than 1,000 hectares (\approx 2,471 acres) and therefore meet the definition of a Small or Low Intensity Forest. The non-SLIMF properties are treated as a separate stratum.

2.0 GUIDELINES/STANDARDS EMPLOYED

As the properties of the RM's group members are located in the Pacific Northwest region of the United States, SCS conducted the re-certification evaluation using the duly-endorsed FSC Pacific Coast Standard (v 9.0). The standard is available at the FSC-US website (<http://www.fscus.org/documents/>) or is available from Scientific Certification Systems upon request (www.scscertified.com).

3.0 THE CERTIFICATION ASSESSMENT PROCESS

3.1 Assessment Dates

SCS conducted the office and field assessments from November 18 – 20, 2008.

Main Evaluation:

3.2 Assessment Team

Mr. Dave Wager, lead auditor and Director of SCS Forest Management Certification:

Mr. Wager is Director of Forest Management Certification for SCS. During his 8 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 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 75 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.

Mr. Kyle Meister, Team Member: Mr. Meister is a new Certification Forester with Scientific Certification Systems. This was his first re-certification audit with SCS. Prior to TMF, Mr. Meister participated in the annual audits of the Mendocino Redwood Company and the Michigan Department of Natural Resources. 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 principal author of this report.

3.3 Assessment Process

3.3.1 Itinerary

November 18, 2008

- Morning office visit – Overview of TMF history, management, personnel updates, client and stakeholder communication, response to 2007 CARs and recommendations.
- Afternoon field visits –
 - Camp Mountaindale , Girl Scout Camp
 - Hayes FMU

November 19, 2008 – Field Visits:

Mr. Kyle Meister:

- Tilbury Forest, Oakland, OR
- Cerro Gordo Silviculture, Cottage Grove, OR

Mr. Dave Wager:

- Zena Forest- Eola Hills 5 miles northwest of Salem, OR
 - Willamette University property
 - Deumling property
- Gahr Farm- McMinnville, OR
- Eric Lemelson, Stermer Tract – Carlton, OR
- Kimball property – Yamhill, OR

November 20, 2008 – Final Review and Closing meeting

3.3.2 Evaluation of Management System

Scientific Certification Systems' evaluation of TMF's group certification program and management included the following components:

- An auditing team with demonstrated credentials and expertise in forest certification, auditing protocols, and forest and wildlife management.
- An office visit to review pertinent documents and TMF's management.
- Interviews with a broad cross-section of stakeholders, including group members (clients) and independent members of the community affected by TMF's management.
- Field visits to examine forest conditions, and results of past and present management activities on sampled FMUs for the re-evaluation certification.

3.3.3 Selection of FMU's to Evaluate

SCS selected 9 of 67 FMUs in the group for the field portion of the assessment. The auditors reviewed forest management activities that have occurred during the 2008 logging season.

3.3.4 Sites Visited

November 18, 2008

- Camp Mountindale , Girl Scout Camp – The landowner's objective was to respond to the local fire chief's inspection of the camp's fire pits and to maintain roads/trails. TMF performed a combination of removing hazardous trees around fire pits, and thinning from below and free thinning of Western red cedar to increase the vigor of the residual stand. Half of the volume of coarse woody debris is to be left onsite for retention requirements, while the camp is permitted to use the other half as firewood. Logging usually occurs when campers are not present.
- Hayes FMU – The landowner has implemented a multiple-aged management approach here to increase spatial complexity through creating regeneration gaps for Douglas-fir and Western redcedar. TMF's monitoring and assessment activities here has led them to create fewer, larger gaps as opposed to several smaller gaps for ease of management. TMF bases gap size on the size of gaps created under natural disturbance regimes. For example, windthrow gaps generally range from 1-5 acres in size and root-rot gaps range from 1-10 acres. In some cases, TMF manages for hardwood mixtures in order to avoid the build-up of Douglas-fir root rot fungus (*Phellinus* sp.) in the soil over time.

November 19, 2008 Field Visits

Mr. Kyle Meister:

Tilbury Forest, Oakland, OR: This FMU contains oak savannah ecosystems and conifer sites. The principal management concern relating to regeneration is invasive species control. Important wildlife features include an elk herd that regularly visits the property. TMF forester, Scott Ferguson, explained how TMF interacts with landowners. TMF typically does a pre- and post-harvest walk through of the FMU with the landowner in order to address any of their concerns and objectives.

- Site #1, Blow down area – replanted with Douglas-fir with retention of Bigleaf maple, and Oregon white oak.
- Site #2, patch cut – replanted with Douglas-fir with retention of Oregon white oak, incense-cedar, and Pacific madrone.
- Site #3, 1990 mixed species thinning – replanted with Douglas-fir, Pacific madrone, Red alder, Bigleaf maple, and Oregon white oak. TMF manages mixed species sites less intensively.
- Site #4, Oregon white oak stand – Located along an access road along a ridge top, this site was most likely an open oak savannah in the past. It is currently densely stocked with oak in the overstory and invasive hawthorn bush in the understory. TMF and the landowner would like to retain the large oaks for a mast seed source and remove invasive hawthorn to recover the site's unique ecosystem values. TMF will herbicide the hawthorn and then use prescribed burns to control it and promote the oak savannah type.
- Site #5, no chemical control of Himalayan blackberry example – Himalayan blackberry is somewhat shade tolerant and responds well to release. In this site, it overtopped the Douglas-fir regeneration.
- Site #6, 15 year old restoration of pasture to forest – The first re-planting was unsuccessful largely due to competition with invasive plants. The rationale was to mimic the patchy nature of natural fires with retention of clumps of madrone, oaks, and Bigleaf maple. TMF had the invasive plants spot sprayed and two years ago replanted the site with Douglas-fir and Western redcedar. Advanced regeneration of Grand fir was retained. Elk damaged much of the cedar.
- Site #7, farm and forest road – The neighbor's cow illegally entered a stream management area in the forest last winter. The current management plan also prohibits the entry of cattle into the forest lands.
- Site #8, Section 26 – On a legacy farm/forestry road, the auditor observed an inappropriate waterbar that emptied directly into an intermittent stream with no swale. There was a culvert in need of repair and riprap, and an area at the bottom of the hill before the culvert that appears to be a poorly drained area.
- Site #9, oak-fir bottomland – In the past, this was an oak savannah site that now has more Douglas-fir. Due to the high water table and shallow soil, it is a poor site for Douglas-fir.
- Site #10, Blow down site – TMF did some salvage logging here in 1996 and 2006 combined with a thinning from below. Since it is a drier site with shallow soils, blow down is an issue. Due to it being between two water courses, TMF retained some of the standing and lying dead wood for wildlife habitat values.

Cerro Gordo Silviculture, Cottage Grove, OR: The Cerro Gordo Silviculture FMU is 400 acres managed apart from the Cerro Gordo planned community. The manager, Chris Canfield, and the residents wish to promote sustainable forestry without the use of chemical herbicides. As such, they control Himalayan blackberry mechanically and as of late have avoided light thinnings, which tended to favor this shade tolerant understory shrub. Mechanical control occurs for three years around planted seedlings and advanced regeneration. Nevertheless, control of Himalayan blackberry has been difficult. Due to engraver beetle damage, some of the Grand fir has been salvaged. TMF has shifted from light thinnings to a combination of thinning from below to favor healthy trees and patch cuts to allow trees to compete against Himalayan blackberry.

Some of the wood harvested from the property goes into the construction of new homes of the Cerro Gordo community. The residents also receive firewood from and harvest mushrooms on the properties.

- Site #1, thinning from below – Overall the site has a high density of Himalayan blackberry. The last understory sampling occurred in 2004 using a transect method. The next one will happen during next inventory (c. 2010). To ensure forest growth and stocking here, TMF used a combination of retention, protection of advanced regeneration, and replanting.
- Site #2, One year old patch cut – This site was planted with Douglas-fir only. TMF contracts the company, Strada, to mechanically control Himalayan blackberry around the seedlings. In the winter, TMF will plant Incense-cedar. Overall this harvest had good distribution of slash and utilization. However, Himalayan blackberry still dominates the understory.
- Site #3, hilltop patch cut and thinning – TMF planted Incense-cedar and Ponderosa pine here, but natural regeneration of Douglas-fir, Chinkapin, madrone, Grand fir, and Ponderosa pine was present. There was less Himalayan blackberry and a more diverse understory of native plants here to begin with, which might partially explain the tree diversity.
- Site #4, Combination of patch and select cuts for uneven-aged mixture – This site is clearly rich in nutrients and soil water due to the presence of native dogwood, *Gaultheria* sp., Western redcedar, Red alder, Bigleaf maple, and oaks. Himalayan blackberry threatens understory vegetation, including *Gaultheria* sp. and dogwood.
- Site #5, stream management zone or “Cottonwood Cathedral” – Himalayan blackberry dominates the understory right to the very banks of the stream. The two cottonwoods are large and possibly quite old. Since they are short-lived and Himalayan blackberry dominates the understory, it is doubtful that they will regenerate successfully from suckering.

Mr. Dave Wager:
Zena Forest-

Zena Forest is owned by two separate group members Sarah Deumling (1,161.61 acres) and Willamette University (304.77 acres). Prior to Euro-American settlement, the area now known as the Zena Forest was likely dominated by oak woodland and savanna. At present

time the property is well stocked with commercial timber species, primarily Douglas-fir. Management over the last 20 years has focused on growing the highest quality sawtimber of a variety of species, including Douglas-fir, Oregon white oak, and bigleaf maple.

In the fall of 2006, the property was cruised for merchantable timber volume and value by Charles Barber and Atterbury Consultants. The resulting data indicate a total of 11,055 thousand board feet (MBF) of merchantable timber on approximately 821 acres, for an average stocking of 13.5 MBF/acre. The remainder of the property consists mainly of young Douglas-fir plantations.

Willamette Tract:

Topics reviewed during 2008 audit:

- Willamette University's goals for the property including variety of teaching, research, restoration, athletic training, arts, and other pursuits.
- restoration at Ponderosa Pine/grassland savannah site
- control of noxious/invasive weeds using different techniques: hand pulling with student labor, herbicide trials (student project is looking at glyphosate)
- goals and priorities for restoration and treating noxious weeds
- boundary marking
- roads
- building site area with existing house and site for possible sustainable agriculture projects
- cutthroat trout restoration on Spring Valley creek

Deumling Tract:

Topics reviewed during 2008 audit:

- removal of orchard cherry
- roadside clearing of Himalayan blackberry and planting with Douglas-fir
- closure of gravel pit
- savannah/meadow areas targeted for restoration- discussed various options: burning, mowing, removal of encroaching conifers
- oak woodland area above meadow- discussed plans for conifer removal to enhance oak component
- regeneration/stocking concerns due to blackberry
- reviewed road conditions across the property

Gahr Farm-

350 acre property near McMinneville, OR. Met with owner Ted Gahr for audit of the property. Property managed with wildlife habitat emphasis.

Topics reviewed during 2008 audit:

- communication with group manager (Gahr- plans to contact TMF before any operations)
- research: Gahr shared some of his hypotheses on phosphorous, mycorrhiza, and oak and maple recruitment

- girdling trees for wildlife habitat tree recruitment
- implementing harvest cycle of the management plan is on hold because of poor markets.

Eric Lemelson Vineyard Property

Eric Lemelson has several vineyard properties that include forestland (totaling 150 acres), which are enrolled in the TMF group. The Stermer Tract was visited during the 2008 audit.

Topics reviewed during 2008 audit:

- Douglas-fir thinning/oak release completed in September of 2007.
- excellent retention of and release of oak trees
- planting of cedar and use of deer repellent, however, high mortality of planting was observed
- very dense Himalayan blackberry in areas of tract
- seeding of skid trails and installation of waterbars resulted in good erosion control

3.3.5 Stakeholder Consultation

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

To solicit input from affected parties as to the strengths and weaknesses of Trout Mountain Forestry's management, relative to the Pacific Coast standard, and the nature of the interaction between the company and the surrounding communities.

To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests.

Principal stakeholder groups of relevance to this evaluation were identified based upon results from the scoping evaluation (if applicable), lists of stakeholders from TMF, and additional stakeholder contacts from other sources (e.g., chair of the regional FSC working group). The following types of groups and individuals were determined to be principal stakeholders:

- TMF employees, including headquarters and field
- TMF Group Certification Program Members
- Trust for Public Land (local environmental NGO)
- Contractors/loggers
- Purchasers of logs harvested on TMF administered forestlands
- Oregon Department of Forestry

Prior to, during, and following the site evaluation, a range of stakeholders from the regional area were consulted in regard to their relationship with the TMF, and their views on the management of Trout Mountain Forestry. Stakeholders included group member, FSC contact persons, government and non-government organizations involved in forest

management, and contractors. Stakeholders were contacted with a notification mailing soliciting comment and/or phone contact. Comments were received via in-person meetings, phone interviews (“Interview”), and through written responses. Additional comments may have been received from individuals not wishing to reveal their identities.

Name	Affiliation	Consultation
Pam Hayes	Group Member	Phone interview
John Peel	Willamette University - Faculty	Meeting
Dan McConnell	Willamette University Groundskeeper	Meeting
Mickey Cochrane	Willamette University Groundskeeper	Meeting
Karen Arabas	Willamette University - Faculty	Meeting
Joe Bowersox	Willamette University - Faculty	Meeting
Sarah Deumling	Zena Forest Manager/Owner	Meeting
Ragsdale Logging	Logging company	Phone interview
Kristen Cotugno	Oregon Department of Forestry (ODF)	Phone interview
Kristin Kovalik	Trust for Public Land	Phone interview
Larry Phelan	Hambleton Lumber	Phone interview

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

Most of the stakeholder comments were very positive. None of the stakeholders alleged non-compliance. The auditors chose to include the comments in the table following this section. In one case (Environmental Concern #2) the auditors summarized several related comments into one comment for TMF to respond to.

Economic Concerns

Comment/Concern	Response
<ul style="list-style-type: none"> We really need more FSC certified wood to meet our demand. 	Duly noted. TMF is trying to address this by expanding its group to include Associate Members.

Social Concerns

Comment/Concern	Response
<ul style="list-style-type: none">Ragsdale logging has a good working relationship with TMF.	Duly noted
<ul style="list-style-type: none">TMF works well with landowners on management planning.	Duly noted

Environmental Concerns

Comment/Concern	Response
<ul style="list-style-type: none">TMF turns in their ODF paperwork on time and is in compliance with Forestry Rules and Practices.	Duly noted
<ul style="list-style-type: none">We have been monitoring birds with the Audubon Society on our property for a few years and have allowed amphibian research. We are interested in incorporating the results of this research into our management plan.	Duly noted

3.4 Total Time Spent on audit

5 auditor days were spent during the stakeholder, office, and field portions of the audit. Three days were spent reviewing documents and writing the report.

3.5 Process of Determining Conformance

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

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

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

Major CARs/Preconditions: Major non-conformances, either alone or in combination with non-conformances of other indicators, result (or are likely to result) in a fundamental failure

to achieve the objectives of the relevant FSC Criterion given the uniqueness and fragility of each forest resource. These are corrective actions that must be resolved or closed out prior to award of the certificate. If major CAR's arise after an operation is certified, the timeframe for correcting these non-conformances is typically shorter than for minor CAR's. Certification is contingent on the certified operations response to the CAR within the stipulated time frame.

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

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

4.0 RESULTS OF THE EVALUATION

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

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

Principle/Subject Area	Strengths Relative to the Standard	Weaknesses Relative to the Standard	CAR/REC #s
P1: FSC Commitment and Legal Compliance	<ul style="list-style-type: none"> ▪ TMF maintains excellent contact with the Oregon Department of Forestry (ODF) and submits all completed timber harvest paperwork on time for ODF review. It follows procedures to detect habitat and presence of federal and state endangered species. 	<ul style="list-style-type: none"> ▪ Unauthorized cattle grazing occurring on one group member property. 	<ul style="list-style-type: none"> ▪ CAR 2008.1
P2: Tenure & Use Rights & Responsibilities	<ul style="list-style-type: none"> ▪ Trout Mountain typically handles boundary issues before management activities occur. ▪ There are no known tenure issues on TMF managed lands. 	<ul style="list-style-type: none"> ▪ Some property lines have not been blazed. 	None
P3: Indigenous Peoples' Rights	<ul style="list-style-type: none"> ▪ Cerro Gordo managers contacted tribal representatives of the Kalapooia several years back. The Kalapooia representatives walked through the property with some of the Cerro Gordo group. No known issues were raised in these encounters. ▪ In 2004, Barry Sims had contacted relevant Tribes for many of the group members. 	<ul style="list-style-type: none"> ▪ TMF managers have no formal archaeological site identification training. ▪ Outreach to Tribes needs to be updated so that all Tribes potentially relevant in TMF group member properties are contacted. 	<ul style="list-style-type: none"> ▪ CAR 2008.2

P4: Community Relations & Workers' Rights	<ul style="list-style-type: none"> ▪ TMF maintains a good working relationship with loggers, contractors, mills, and wood buyers. ▪ Contractors meet regulated training and safety requirements. ▪ TMF offers many opportunities for the public to comment on management activities. ▪ TMF included their newly hired office manager in the FSC auditing process, signifying her importance to the team. 	<ul style="list-style-type: none"> ▪ TMF managers have no formal archaeological site identification training. 	<ul style="list-style-type: none"> ▪ REC 2008.1:
P5: Benefits from the Forest	<ul style="list-style-type: none"> ▪ TMF investigates the timber markets for opportunities for value-added products locally. ▪ Utilization and compliance with BMPs is good. ▪ TMF is dedicated to making its business last beyond when its initial founders are gone by hiring younger staff. 	<ul style="list-style-type: none"> ▪ Inventory and monitoring could be more robust and completed on a regular basis. 	<ul style="list-style-type: none"> ▪ REC 2008.2 ▪ REC 2008.3
P6: Environmental Impact	<ul style="list-style-type: none"> ▪ TMF minimizes environmental impacts throughout their operations, and in many cases TMF takes actions to restore ecosystem functions and habitats. ▪ TMF has spent much time investigating oak restoration, and applies this knowledge to group member properties where oak restoration is possible. ▪ TMF assesses and protects endangered species habitat. 	<ul style="list-style-type: none"> ▪ TMF must carry out a more formal environmental assessment prior to a harvesting on properties larger than 2500 acres (Non-SLIMF). ▪ Understory vegetation diversity is lacking on some properties due to invasive Himalayan blackberry. ▪ TMF had been using an FSC prohibited herbicide, on one group member property. 	<ul style="list-style-type: none"> ▪ CAR 2008.1 ▪ CAR 2008.3 ▪ CAR 2008.4 ▪ CAR 2008.5 ▪ CAR 2008.6

P7: Management Plan	<ul style="list-style-type: none"> ▪ TMF makes their over-arching management plan publicly available and sends information packets out to interested landowners. 	<ul style="list-style-type: none"> ▪ Several new and current members lack up-to-date management plans. 	<ul style="list-style-type: none"> ▪ CAR 2008.7
P8: Monitoring & Assessment	<ul style="list-style-type: none"> ▪ TMF strives to update inventories every 10 years. ▪ TMF maintains logs of timber receipts and time spent with landowners. ▪ TMF updates plans every 10 years and incorporates new inventory and harvest data. 	<ul style="list-style-type: none"> ▪ As TMF's membership expands, incorporating the results of monitoring into the management plan could become more difficult. 	
P9: Maintenance of High Conservation Value Forest	<ul style="list-style-type: none"> ▪ TMF has made much progress in identifying HCVPs on municipal and community forest properties. ▪ TMF actively engages stakeholders in concerns over HCVPs. 	<ul style="list-style-type: none"> ▪ TMF lacks a formal procedure for HCVP assessment in their management planning process. 	<ul style="list-style-type: none"> ▪ CAR 2008.8

4.2 Preconditions

Preconditions are major corrective action requests that are placed on a forest management operation after the initial evaluation and before the operation is certified. Certification cannot be awarded if open preconditions exist.

No preconditions were placed on Trout Mountain Forestry during the initial evaluation.

5.0 CERTIFICATION DECISION

5.1 Certification Recommendation

As determined by the full and proper execution of the SCS *Forest Conservation Program* evaluation protocols, the evaluation team hereby recommends that Trout Mountain Forestry (TMF) be awarded FSC certification as a “Well-Managed Forest” subject to the corrective action requests stated in Section 5.3. TMF has demonstrated that their system of management is capable of ensuring that all of the requirements of the Pacific Coast Standard, Version 9.0 are met over the forest area covered by the scope of the evaluation. TMF 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 Status of Corrective Action Requests

Background/Justification: An assessment to identify locations of old growth stand types, as defined in the Pacific Coast standard, has not been completed for the Corvallis City Watershed property. While it appears that there has been no harvesting within stands potentially qualifying as type 1 or 2 stands, TM foresters must be able to assure SCS that indicator 6.3.d, considered a major failure, is being met.	
CAR 2007.1	Trout Mountain must conduct an assessment to determine the existence of old growth stands types within the Corvallis City Watershed property. If such stands do exist, Trout Mountain must complete, and provide to SCS, a map indicating the locations of these stands.
Deadline	2008 Re-certification Audit
Reference	<i>Criterion 6.3.d</i>
TMF Response/ Auditor comments: TMF provided the auditors with detailed maps indicating the locations of old growth stand types and production forest within the Corvallis City Water Watershed property. As such, this CAR is closed. Please see CAR 2008.8 for more information.	

5.3 Initial Corrective Action Requests

Background/Justification: Unauthorized cattle grazing is occurring on forested areas of the Tilbury property.	
CAR 2008.1	Trout Mountain Forestry must take appropriate measures to ensure that cattle grazing and other unauthorized activities do not occur on TMF managed properties.
Deadline	2009 Annual Audit
Reference	<i>Indicators 1.5.a and 6.5.t</i>

Background/Justification: Efforts to consult with Tribes were made in 2004. These efforts need to be taken again, and cover all the properties now within the TMF group.	
CAR 2008.2	TMF shall ensure that there is appropriate outreach to tribes covering all properties under the Trout Mountain group certification.
Deadline	2009 Annual Audit
Reference	<i>Indicators 3.2.a and 3.3.a</i>

Background/Justification: TMF lacks a formal environmental assessment for NON-SLIMF properties.	
CAR 2008.3	Trout Mountain should develop a procedure for implementing formal environmental assessments prior to harvesting or disturbing a site on non-SLIMF properties.
Deadline	2009 Annual Audit
Reference	<i>Indicator 6.1.c; see REC 2008.5</i>

Background/Justification: Due to the expansion of invasive Himalayan blackberry, there is a lack of understory plant community diversity on the Cerro Gordo, Lemelson properties, and other properties.	
CAR 2008.4	TMF must take additional action to address the loss of understory plant community diversity on properties such as Cerro Gordo and Lemelson.
Deadline	2009 Annual Audit
Reference	<i>Indicator 6.3.e.3 and 6.3.e.4</i>

Background/Justification: A newly constructed waterbar on the Tilbury property emptied directly into a stream. Moreover, a culvert is in need of repair and there is potential for drainage problems on other sections of the same forest road.	
CAR 2008.5	Trout Mountain must address failed drainage structures and BMPs on forest roads of the Tilbury property and other properties with similar occurrences.
Deadline	2009 Annual Audit
Reference	<i>Indicator 6.5.j</i>

Background/Justification: TMF has used a prohibited herbicide, atrazine, on at least one group member property.	
Major CAR 2008.6	TMF immediately discontinue use of this chemical or apply for the appropriate derogations through FSC International. In either case, TMF must provide documented evidence to the auditors of its actions regarding this matter.
Deadline	2009 Annual Audit
Reference	<i>Indicator 6.6.a</i>

Background/Justification: At least one new group members of TMF has no management plan. Many other group members have out-of-date management plans according to TMF's own management plan revision policy (i.e., plans older than 10	
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years).	
CAR 2008.7	TMF must ensure that all new and current members have management plans. Additionally, TMF must provide an action plan and timeline for ensuring that all management plans of group member properties are current and address indicators a-i of criterion 7.1.
Deadline	2009 Annual Audit
Reference	<i>Criterion 7.1</i>

Background/Justification: TMF's management plan currently contains no procedure for formally identifying HCVFs on new and existing group members' properties.	
CAR 2008.8	TMF must incorporate an HCVF assessment into their management plan process using the HCVF categories described into the FSC standard. Guidance is included in the US National HCV assessment template found on the FSC-US website.
Deadline	2009 Annual Audit
Reference	<i>Criterion 9.1</i>

Background/Justification: Although TMF has found some old homesteading sites on group properties, TMF staff have little or no training in identifying archeological sites.	
REC 2008.1	TMF could improve their in-house knowledge of how to identify historic and prehistoric archaeological sites.
Reference	<i>Indicator 4.4.c</i>

Background/Justification: There is some mushroom picking by residents and non-resident individuals/groups on the Cerro Gordo properties.	
REC 2008.2	The scale of NTFPs is very small on TMF properties. However, TMF should address NTFPs in the management plan where applicable.
Reference	<i>Indicator 5.2.d</i>

Background/Justification: Due to the small scale of operations on some properties, TMF visits some landowners rather infrequently.	
REC 2008.3	For properties that are infrequently visited, TMF should establish a schedule for monitoring regeneration in openings to ensure proper stocking levels.
Reference	<i>Indicator 5.6.c</i>

Background/Justification: TMF lacks a formal environmental assessment for SLIMF properties.	
REC 2008.4	Trout Mountain should develop a procedure for implementing formal environmental assessments prior to harvesting or disturbing a site for both SLIMF and NON-SLIMF properties.
Reference	<i>Indicator 6.1.c; see CAR 2008.3</i>

6.0 SURVEILLANCE EVALUATIONS

If certification is awarded, surveillance evaluations will take place at least annually to monitor the status of any open corrective action requests and review the continued conformance of Trout Mountain Forestry to the Pacific Coast Standard. Public summaries of surveillance evaluations will be posted separately on the SCS website (www.scs-certified.com).

7.0 SUMMARY OF SCS COMPLAINT AND APPEAL INVESTIGATION PROCEDURES

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

A **complaint** is a written expression of dissatisfaction, other than **appeal**, by any person or organization, to a certification body, relating to the activities of staff of the SCS Forest Conservation Program and/or representatives of a company or entity holding either a forest management (FM) or chain-of-custody (CoC) certificate issued by SCS and duly endorsed by FSC, where a response is expected (ISO/IEC 17011:2004 (E)). The SCS Complaint Investigation Procedure functions as a first-stage mechanism for resolving complaints and avoiding the need to involve FSC.

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

The written Complaint or Appeal must:

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

Written complaints and appeals should be submitted to:

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