



**FSC Certification Report for the  
2008 Annual Audit of:  
Collins Lakeview Forest  
Lakeview, OR  
Certificate Number: SCS-FM/COC-00012N**

**Under the  
SCS Forest Conservation Program  
(An FSC-Accredited Certification Program)**

**Date of Field Audit: November 21, 2008  
Date of Report: February 26, 2009**

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Section 2.0 (Surveillance Decision and Public Record) will be made publicly available on the SCS website ([www.scscertified.com](http://www.scscertified.com)) no later than 60 days after the report is finalized.

## **1.0 GENERAL INFORMATION**

### **1.1 CONTACT INFORMATION**

COLLINS LAKEVIEW FOREST/FREMONT SAWMILL

P.O. BOX 1340

LAKEVIEW, OR, 97630

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Webpage: <http://www.collinswood.com/CertifiedForests/LakeviewSCS.html>

### **1.2 General Background**

This report covers the first annual audit of Collins Lakeview Forest (CLF) pursuant to the FSC guidelines for annual audits as well as the terms of the forest management certificate awarded by Scientific Certification Systems in March 2008 (SCS-FM-00012N). All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual audits to ascertain ongoing compliance with the requirements and standards of certification. A public summary of the initial evaluation is available on the SCS website [www.scs-certified.com](http://www.scs-certified.com).

Pursuant to FSC and SCS guidelines, annual/surveillance audits are not intended to comprehensively examine the full scope of the certified forest operations, as the cost of a full-scope audit would be prohibitive and it is not mandated by FSC audit protocols. Rather, annual audits are comprised of three main components:

- A focused assessment of the status of any outstanding conditions or corrective action requests
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior audit
- As necessary given the breadth of coverage associated with the first two components, an additional focus on selected topics or issues, the selection of which is not known to the certificate holder prior to the audit.

At the time of the November 2008 annual audit, there were 6 open Corrective Action Requests, the status of CLF's response to which was a major focus of the annual audit (see discussion, below for a listing of those CARs and their disposition as a result of this annual audit.

### **1.3 Guidelines/Standards Employed**

For this annual audit, the SCS auditor team evaluated the extent of conformance with the current version of the FSC Pacific Coast Regional Standard, which was endorsed in May 2005.

## **2.0 SURVEILLANCE DECISION AND PUBLIC RECORD**

### **2.1 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.

## **2.2 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.

## **2.3 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

## 2.4 Status of Corrective Action Requests

<b>Observed nonconformity:</b> 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.	
<b>CAR 2007.1</b>	CLF must develop and implement mechanisms for providing people and groups with notification of upcoming forestry operations and opportunities for input.
<b>Reference</b>	FSC Criterion 4.4.a
<b>CLF Response</b> 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. SCS Auditor Finding: SCS verified that the above actions occurred.	
<b>Disposition as a result of this audit: CAR Closed</b>	

<p><b>Observed nonconformity:</b> The Pacific Coast Standard requires retention of woody debris for both habitat and productivity considerations as stated in the following Indicators:</p> <p><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 considered for use in other productive processes.</i></p> <p><i>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.</i></p> <p>For example:</p> <ul style="list-style-type: none"> <li>▪ <i>Old trees with irreplaceable characteristics are retained.</i></li> </ul>
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- *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.

<b>CAR 2007.2</b>	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.
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<b>Reference</b>	FSC Criterion 5.3, 6.3
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**CLF Response:** 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.”

“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.”

“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” (*sic*).

“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.”

**SCS Auditor Finding**

CLF provided SCS with a DWD and Snag recruitment policy with a target for woody debris retention.

**Disposition as a result of this audit: CAR Closed**

<b>Observed nonconformity:</b> 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.	
<b>CAR 2007.3</b>	CLF must develop and implement a harvest area environmental assessment process for salvage logging operations.
<b>Reference</b>	FSC Criterion 6.1 and Indicator 6.3.c.4
<p><b>CLF response:</b></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><b>SCS Auditor Finding:</b></p> <p>Although the latter paragraph attempts to respond to CAR 2007.3, CLF has yet to adequately address it. CLF’s environmental review process for salvage operations need not be like that of the USDA Forest Service’s in length or process. 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 <b>CAR remains open.</b></p>	
<b>Deadline to respond:</b> Within 3 months of finalization of this report.	
<b>Disposition as a result of this audit: CAR replaced with Major CAR</b>	
<p><b>Observed nonconformity:</b> 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”.</p> <p>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.</p>	

<b>CAR 2007.4</b>	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.
<b>Reference</b>	FSC Criterion 6.3
<p><b>CLF response:</b> 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.”</p> <p>“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.”</p> <p>*Refers to 50+ years of management, including multiple rotations and entries, and periodic salvage logging.</p> <p><b>SCS Auditor Finding:</b> 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.</p>	
<b>Disposition as a result of this audit: CAR Closed; Also see CAR 2008.3</b>	

**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.

<b>CAR 2007.5</b>	CLF must develop and implement a strategy for green tree retention in openings that exceed 6 acres.
<b>Reference</b>	FSC Indicator 6.3.e.5
<p><b>CLF response:</b> “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.”</p> <p>“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.”</p> <p><b>SCS Auditor Findings</b> 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.</p> <p><b>Disposition as a result of this audit: CAR Closed</b></p>	

**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.*

<b>CAR 2007.6</b>	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.
<b>Reference</b>	FSC Criterion 7.1
<b>CLF response:</b> “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.”	
SCS Auditor Findings: CLF has not demonstrated how it will (or has) combined its response to this CAR with CAR 2007.1. SCS has not yet been presented with a management plan that includes landscape level considerations.	
<b>Deadline to respond:</b> Within 3 months of finalization of report.	
<b>Disposition as a result of this audit: CAR replaced with Major CAR</b>	

### Status of Recommendations

<b>Background/Justification:</b> 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.	
<b>REC 2007.1</b>	CLF should exclude cattle from damaged watercourses and riparian areas.
<b>Reference</b>	<i>FSC Criterion 1.5a</i>
<b>Response:</b> 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 with 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. CLF is applying for state cost share funding to deal with this issue.	

<b>Background/Justification:</b> There is no written action plan and priority list for treating invasive exotic plant species.	
<b>REC 2007.2</b>	CLF should prepare and implement a program for identifying, prioritizing, and treating invasive exotic plants.
<b>Reference</b>	<i>FSC Indicator 6.9.b</i>
<b>Response:</b> CLF has not developed a written action plan and priority list for treating invasive exotic plant species. See recommendation 2008.2	

<b>Background/Justification:</b>	
<b>REC 2007.3</b>	CLF should implement a formal system for identifying and prioritizing

	monitoring needs.
<b>Reference</b>	<i>FSC Indicator 8.4a</i>
<b>Response:</b> CLF has not implemented a formal system for identifying and prioritizing monitoring needs. See CAR 2008.3.	

## 2.5 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.

CLF can improve its FSC conformance through better documentation of its actions, such as 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.

## 2.6 New Corrective Action Requests and Recommendations

<b>Background/Justification:</b> 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.	
<b>CAR 2008.1</b>	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.
<b>Deadline</b>	2009 Annual Audit
<b>Reference</b>	<i>FSC Criterion 1.1a</i>

<b>Background/Justification:</b> CLF has no formal system for identifying and prioritizing monitoring needs as indicated under FSC Principle 8.	
<b>CAR 2008.2</b>	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.
<b>Deadline</b>	2009 Annual Audit
<b>Reference</b>	<i>FSC Indicators 8.4a</i>

<b>Background/Justification:</b> 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.	
<b>CAR 2008.3</b>	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.
<b>Deadline</b>	2009 Annual Audit
<b>Reference</b>	<i>FSC Criterion 6.3.d.3</i>

**Recommendations:**

<b>Background/Justification:</b> 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.	
<b>REC 2008.1</b>	Since this area is near an active harvest site, this poorly drained area should be fixed before it becomes a bigger problem.
<b>Reference</b>	<i>FSC Indicator 6.5.j</i>

<b>Background/Justification:</b> There is no written action plan and priority list for treating invasive exotic plant species.	
<b>REC 2008.2</b>	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.
<b>Reference</b>	<i>FSC Indicator 6.9.b</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 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.

## 3.0 DETAILED OBSERVATIONS

This section is divided into two parts: Section 3.1 details the determining of conformance and non-conformance with the elements of the standard examined during this audit. Section 3.2 discusses any stakeholder comments.

### 3.1 Evaluation of Conformance

The auditor chose to focus on Principles 1 and 8 during this surveillance audit:

**C= Conformance with Criterion**

**C\*= Overall Conformance with Criterion, but there are Indicator non-conformances**

**NC= Non-Conformance with Criterion**

Requirement	C/NC	Comment/CAR
<b>P1 Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.</b>		
<b>C1.1 Forest management shall respect all national and local laws and administrative requirements.</b>	C	CAR 2008.1: 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.
<b>C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.</b>	C	CLF pays all required fees and taxes on its timber and properties.
<b>C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.</b>	C	CLF works with the Oregon Department of Fish and Wildlife and the Oregon Department of Forestry to protect rare and endangered fish habitat.
<b>C1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and by the involved or affected parties.</b>	NA	
<b>C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</b>	C	CLF is cooperating with the Oregon Department of Fish and Wildlife on the Rosa Creek issue cited under Recommendation 2007.1. They will fence off the creek to exclude cattle grazing and use engineering measure to stabilize the head-cut.
<b>C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</b>  <i>Applicability note to Criterion 1.6.: Assessment of this criterion is guided by both FSC Policy and Guidelines: Partial Certification for Large Ownerships (BM19.24, May 2000 available at <a href="http://www.fsc.org/en/whats_new/documents/Docs_cent/2">http://www.fsc.org/en/whats_new/documents/Docs_cent/2</a> and the FSC Guidelines for Certification Bodies FSC STD 20-001 (version 2.1).</i>	C	CLF has been certified since 1998 along with several other holdings of the Collins Company. CLF's has a management plan that includes its silvicultural treatments and strategies for sustainable forestry.
<b>P2 Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</b>		
<b>P3 The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</b>		
<b>P4 Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</b>		
<b>P5 Forest management operations shall encourage the efficient use of the forest's multiple products and services to ensure economic viability and a wide range of environmental and social benefits.</b>		
<b>P6 Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.</b>		
<b>C6.1. Assessments of environmental impacts shall be completed - - appropriate to the scale, intensity of forest management and the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.</b>	C*	CAR 2007.3: 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.

<p><i>Applicability Note: Small landowners that practice low-intensity forestry may meet this requirement with brief, less rigorous assessments. More extensive and detailed assessments (e.g., formal assessments by experts) are expected from large landowners and/or those who practice more intensive forestry (see Glossary) management.</i></p>		
<p><b>C6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.</b></p>	C	
<p><b>C6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including:</b>  <b>a) Forest regeneration and succession.</b>  <b>b) Genetic, species, and ecosystem diversity.</b>  <b>c) Natural cycles that affect the productivity of the forest ecosystem.</b>  <b>d) Old-growth stands and forests</b>  <b>e) Retention</b>  <b>f) Even-aged silvicultural systems</b>  <i>Applicability note: Indicators under 6.3.a. &amp; b. may have limited applicability for managers of small and mid-sized forest properties because of their limited ability to coordinate their activities with other owners within the landscape, or to significantly maintain and/or improve landscape-scale vegetative patterns.</i></p>	C*	<p>CAR 2007.3: 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.</p> <p>CAR 2008.3: 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.</p>
<p><b>C6.5. Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.</b>  <i>Applicability note: Soil cover and fertility are maintained in a condition that is sufficient to: (1) minimize soil erosion, (2) protect soil microbial communities, (3) protect inherent site productivity, (4) protect surface water quality, and (5) protect the natural processes in aquifers. The type and extent of canopy cover and groundcover required to accomplish the above is dependent on the following: slope; stability of the soil; potential for soil compaction; and characteristics of the climate, such as the intensity and frequency of precipitation.</i></p>	C	<p>REC 2008.1: 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. Since this area is near an active harvest site, this poorly drained area should be fixed before it becomes a bigger problem.</p>
<p><b><u>Stream and Water Quality Protection</u></b></p>		
<p><i>Applicability Note: The following water quality requirements of this standard are superceded when and where state or federal laws, regulations, or other contractual requirements are more stringent. This section uses the following definitions:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Category A stream: A stream that supports or can support populations of native fish and/or provides a domestic water supply.</i></li> <li>▪ <i>Category B stream: Perennial streams that do not support native fish and are not used as a domestic water supply.</i></li> <li>▪ <i>Category C stream: An intermittent stream that never the less has sufficient water to host populations of non-fish aquatic species</i></li> <li>▪ <i>Category D stream: A stream that flows only after rainstorms or melting snow and does not support populations of aquatic species</i></li> </ul>		
<p><b>C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</b></p>	C	<p>REC 2008.2: There is no written action plan and priority list for treating invasive exotic plant species. 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.</p>
<p><b>P7 A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</b></p>		
<p><b>7.1. The management plan and supporting documents shall provide:</b></p>	C*	<p>CAR 2007.6: The CLF Management Plan does not include a landscape level assessment per requirement 7.1.b.6.</p>

<p>a) Management objectives.  b) Description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.  c) Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories.  d) Rationale for rate of annual harvest and species selection.  e) Provisions for monitoring of forest growth and dynamics.  f) Environmental safeguards based on environmental assessments.  g) Plans for the identification and protection of rare, threatened and endangered species.  h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.  i) Description and justification of harvesting techniques and equipment to be used.</p> <p><i>Applicability Note: The management plan may consist of a variety of documents not necessarily unified into a single planning document but which, nevertheless, represents an integrated strategy for managing the forest.</i></p>		
<p><b>P8 Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.</b>  <i>Applicability Note: On small and medium-sized forests, an informal, qualitative assessment may be appropriate. On large and/or intensively managed forests, formal, quantitative monitoring is probably required.</i></p>		
<p><b>C8.1. The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</b></p>	C	CLF staff assesses and monitors the results of timber inventories. Monitoring of stream flows, roads, and active timber harvests are examples of short-term monitoring activities.
<p><b>8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators:</b>  a) Yield of all forest products harvested.  b) Growth rates, regeneration and condition of the forest.  c) Composition and observed changes in the flora and fauna.  d) Environmental and social impacts of harvesting and other operations  e) Cost, productivity, and efficiency of forest management</p>	C	CLF gathers data on a), b) and e) and has informal assessments for c) and d). There is monitoring for water temperature in some streams and for red band trout. CLF followed up on the issue of cattle grazing and a head-cut in a stream.
<p><b>C8.3. Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."</b>  <i>Note: The Working Group considers this criterion sufficiently explicit and measurable. Indicators are not required.</i></p>	C	CLF possesses a Chain-of-Custody permit and has a system in place to separate certified from non-certified product.
<p><b>C8.4. The results of monitoring shall be incorporated into the implementation and revision of the management plan.</b></p>	C*	<p>CLF's response to fires and insect outbreaks has led to changes in the management plan's course.</p> <p>CAR2008.2: CLF has no formal system for identifying and prioritizing monitoring needs as indicated under FSC Principle 8.</p>
<p><b>C8.5. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.</b>  <i>Applicability Note: Forest owners or managers of private forests may withhold proprietary information (e.g., timber volumes and age</i></p>	C	The Collins Companies maintain a website for communication with the public on its management activities on its forests of North America. CLF's public summary includes information on its monitoring activities on company lands. It has a description of CLF monitoring activities that includes regeneration, yield of forest products, growth monitoring, forest health assessments,

<i>classes, marketing strategies, and other financial information).</i>	roads, streams, and other parameters.
<p><b>P9 Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</b></p> <p><b>High Conservation Value Forests are those that possess one or more of the following attributes:</b></p> <p><b>a) forest areas containing globally, regionally or nationally significant : concentrations of biodiversity values (e.g. endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance</b></p> <p><b>b) forest areas that are in or contain rare, threatened or endangered ecosystems</b></p> <p><b>c) forest areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control)</b></p> <p>d) forest areas fundamental to meeting basic needs of local communities (e.g. subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).</p> <p><i>Applicability note: Classification of a forest as a "high conservation value forest" (HCVF) does not automatically preclude active management. In addition to the forest types listed in sections (a) through (d) of the HCVF definition, HCVFs in the Pacific Coast region include:</i></p> <ul style="list-style-type: none"> <li>• forest types listed in Appendix D (i.e., rare communities in the region), unless further refined by consultations with heritage programs, local native plant societies, local experts, and NGOs</li> <li>• primary, late-successional, or old-growth forests (<i>see also criterion 6.3.</i>)</li> <li>• roadless areas (areas that have never had logging roads, skid trails, etc.) larger than 500 acres or that have unique attributes</li> <li>• habitats for rare species, and may include: <ul style="list-style-type: none"> <li>○ water catchments that provide water supplies to municipalities</li> <li>○ buffers and corridors within landscape-level plans that are critical to the maintenance of processes and functions of high conservation value areas (see also criteria 6.3 - 6.5); and</li> <li>○ native grasslands, wetlands, and other ecologically important non-forested sites within the forest.</li> </ul> </li> </ul> <p><i>Note: The status of HCVFs on American Indian lands requires special consultation between certifying teams and the affected tribe or nation.</i></p>	

### 3.2 Stakeholder Comment

The auditor interviewed the following stakeholders either in person or over the phone:

<b>Person interviewed</b>	<b>Position/Organization</b>
Shannon Hern	Fish biologist, Oregon Department of Fish and Wildlife
Jim Wallace	Lake County Resource Board

Mr. Wallace has very positive things to say about CLF and their commitment to stewardship and the local economy.

Ms. Hern provided the auditor with information on the Rosa Creek issue. See response to REC 2007.1

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

### 3.3 Controversial Issues

No exceptionally controversial or difficult issues presented themselves during this surveillance audit.

### **3.4 Changes in Certificate Scope**

There were no changes in the scope of this certificate during the previous year.