

FOREST MANAGEMENT AND STUMP-TO-FOREST GATE CHAIN-OF-CUSTODY SURVEILLANCE EVALUATION REPORT

Collins Pine Company *Collins Lakeview Forest*

Lake and Klamath Counties, Oregon and Modoc County, CA

SCS-FM/COC-00012N

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CERTIFIED	EXPIRATION
15 March 2013	14 July 2018

DATE OF FIELD AUDIT
4-5 August 2015
DATE OF LAST UPDATE
16 Sept 2015

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Foreword

Cycle in annual surveillance audits			
<input type="checkbox"/> 1 st annual audit	<input type="checkbox"/> 2 nd annual audit	<input checked="" type="checkbox"/> 3 rd annual audit	<input type="checkbox"/> 4 th annual audit
Name of Forest Management Enterprise (FME) and abbreviation used in this report:			
Collins Pine Company - Collins Lakeview Forest - CLF			

All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual audits to ascertain ongoing conformance with the requirements and standards of certification. A public summary of the initial evaluation is available on the FSC Certificate Database <http://info.fsc.org/>.

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 (CARs; see discussion in section 4.0 for those CARs and their disposition as a result of this annual audit);
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior to this audit; and
- 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.

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 FSC Certificate Database (<http://info.fsc.org/>) no less than 90 days after completion of the on-site audit. Section B contains more detailed results and information for the use by the FME.

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Annual Audit Team

Auditor Name:	Dr. Walter R. Mark	Auditor role:	Lead Auditor
Qualifications:	Dr. Mark is a professor emeritus of forestry at California Polytechnic State University, San Luis Obispo and former Director of Swanton Pacific Ranch, the University’s FSC Certified school forest. Dr. Mark specializes in forest health and silviculture. Dr. Mark is a consultant for SCS and is responsible for the audit. Dr. Mark is a registered professional forester in California (RPF No. 1250) and a certified forester with the Society of American Foresters) with over 40 years of forestry experience in public and private forestry and higher education sectors. He has served as audit team member and leader for several certification, recertification, scoping, and annual audits over the past several years.		

1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	2.0
B. Number of auditors participating in on-site evaluation:	1.0
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	1.5
D. Total number of person days used in evaluation:	3.5

1.3 Standards Employed

1.3.1. Applicable FSC-Accredited Standards

Title	Version	Date of Finalization
FSC US Forest Management Standard	1.0	July 8, 2010
SCS FSC Chain of Custody Indicators for Forest Management Enterprises	V5.1	
All standards employed are available on the websites of FSC International (www.fsc.org), the FSC-US (www.fscus.org) or the SCS Standards page (www.scsglobalservices.com/certification-standards-and-program-documents). Standards are also available, upon request, from SCS Global Services (www.SCSglobalServices.com).		

2 Annual Audit Dates and Activities

2.1 Annual Audit Itinerary and Activities

Date: Tuesday August 4, 2015	
FMU / Location / sites visited	Activities / notes
Collins Lakeview Forest	Opening Meeting: Introductions, client update, review of scope of

<p>Offices/am</p>	<p>audit and audit plan, review of SCS and FSC standards and protocols, review of open CARS and OBS, final site selection.</p> <p>Review of appropriate documents in office. Requested copies of documents needed, including conservation easement agreements and herbicide application records.</p> <p>Review of monitoring program for Modoc Tract. Discussed invasive species control and monitoring of control efforts.</p>
<p>Collins Lakeview Forest/Modoc Tract/am - pm</p>	<p>Travelled to the Modoc Tract and discussed terms of new Conservation Easement in place with the Pacific Forest Trust, LLC. In the Modoc Tract numerous stops were made in the Barry Point Fire burn area to review herbicide treatment and efficacy along with the special protection measures that were utilized to protect resources such as RTE species habitat, riparian buffers, aspen groves, meadows, and scab rock areas. Also looked at sites where invasive species control was part of the herbicide site treatment effort. The main invasive species targeted were Dyer’s Woad and musk thistle. The herbicide was applied by helicopter and was the first aerial application of herbicide on forest lands in the North Coast Regional Water Quality Control Board Region approved in the last 17 years. This required extensive consultation and close coordination with the California Department of Fish and Wildlife, Cal Fire, and the California Regional Water Control Board.</p> <p>The area was treated with glyphosate and imazapyr to control both herbaceous and woody competition, specifically thistle, grasses, snowbrush, forbs, and squaw carpet. The total area treated was 12, 270 acres. The criteria for selection of areas to be treated in this method versus the hexazinone application planned in fall 2015 was reviewed. An area was left as an untreated trial area to observe the impacts of no treatment. Observed the sign on the Barry Point Fire Restoration efforts jointly sponsored by the Wildlife Conservation Board, Pacific Forest Trust, and Collins Pine Company. NRCS, US Fish and Wildlife also provided grants for the restoration process. Much discussion centered on the special habitat management zones specified in the conservation agreement. The future status of these needs to be determined with regard to the FSC terminology.</p>
<p>Date: Wednesday August 5, 2015</p>	
<p>FMU / Location / sites visited</p>	<p>Activities / notes</p>
<p>Collins Lakeview Forest Offices/am</p>	<p>Discussed data from herbicide application on the Modoc Tract. Discussed the inclusion of Special Habitat Management Zones on the Modoc Tract as RSA’s or HCVF’s. Reviewed some of the elements of the management plan and discussed the annual allowable cut calculations and the updating necessary in the management plan due to acquisitions and the Barry Point Fire.</p>

<p>Collins Lakeview Forest/Goose Lake Tract/am - pm</p>	<p>Discussed the consultative process for the herbicide treatment and other restoration efforts planned on the Modoc Tract on the way to Goose Lake. Consultation included Cal Fish and Wildlife botanist, Cal State Archeologist, USFS silviculturalist, Cal Regional Water Control Board. Discussed the history of use and ownership of the Goose Lake Tract. First stop was the Deer Springs harvest area. This was a selection harvest to reduce basal area and concentrate growth on larger trees. The stands had previously been pre-commercially thinned and salvage logged. The desired spacing after logging is 20 x 20 with around 110 trees per acre. No regeneration is planned in this harvest due to the high residual stand density planned. Very little residual stand damage was observed. Slash piles from previous ownership activity are planned for burning to dispose of them. Pockets of dwarf mistletoe were observed in the residual stand. These will be dealt with in the next entry where regeneration will be a goal of the silvicultural operations. Hot saws restrictions due to dry weather were discussed. Fire equipment on site was examined. While this harvest area was active, there was no work on the day of the audit visit. The next stop was an active chip harvest area taking place in the former Bug Springs harvest area. The chipping was done on site and chips were loaded directly into the chip vans for transport to the Klamath Falls hardboard Facility. This was a thinning operation to remove small diameter and lower canopy trees to reduce fuel ladders and promote overstory growth.</p>
<p>Collins Lakeview Forest Offices/pm</p>	<p>Auditor completed preparation for the closing meeting. The closing meeting was held in the conference room with Lee Fledderjohann and Travis Erickson representing CLF. The preliminary findings of the audit were presented and discussed. The future audit cycles were discussed.</p>

2.2 Evaluation of Management Systems

SCS deploys interdisciplinary teams with expertise in forestry, social sciences, natural resource economics, and other relevant fields to assess an FME’s conformance to FSC standards and policies. Evaluation methods include document and record review, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observation of implementation of management plans and policies in the field, and stakeholder analysis. When there is more than one team member, team members may review parts of the standards based on their background and expertise. On the final day of an evaluation, team members convene to deliberate the findings of the assessment jointly. This involves an analysis of all relevant field observations, stakeholder comments, and reviewed documents and records. Where consensus between team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

3. Changes in Management Practices

CLF is undergoing a significant change in management practices on a portion of their holdings. They have entered into a conservation easement agreement with the Pacific Forest Trust for nearly the entire Modoc Tract. The purpose of this agreement is to continue forest management in perpetuity on the Modoc Tract, to restrict uses such as structures, residences, improvements, stream alterations, dumping, mineral extraction, agriculture, and signage. The Modoc Tract is a major wildlife habitat and migration area, and forest management contributes to the value of the habitat. The restoration of the conifer forest is critical to maintaining the value of this habitat. Some special habitat management zones are established as part of the conservation agreement. These include forested meadow edge, meadows, riparian management zones, and aspen. These are planned for evaluation for inclusion in the RSA and HCVF designation utilized by FSC. Other significant areas have been identified, such as scab rock areas that harbor species such as the plant woolly stenosus, on the CNPS 2B.2 list of endangered plants in California.

4. Results of the Evaluation

4.1 Existing Corrective Action Requests and Observations

Finding Number: 2014.1	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	SCS FSC Chain of Custody Indicators for Forest Management Enterprises; 3.2, FSC Trademark Standard 50-001
<p>Non-Conformity: A non-conforming use of FSC logo was found during the 2013 audit on the collinsco.com website homepage (logo does not use the promotional panel format or list a trademark license code). CAR 2013.2 was issued however there was no corrective action taking to remedy the situation. As a result, minor CAR 2013.2 is upgraded to Major CAR 2014.1.</p>	
<p>Corrective Action Request: The FME must, as a standard operating procedure, request authorization from SCS to use the FSC on-product labels and/or FSC trademarks for promotional use. The use of the FSC trademarks for promotional use on the collinsco.com website must be brought into conformance with guidelines for use.</p>	
FME response (including any evidence submitted)	The IT person, Cameron Waner, from The Collins Companies main office worked with SCS representative Jillian Van Luchem to correct all the issues with all of the Collins Companies website pages and the usage of the FSC trademark and logos. This was completed on 12/4/14.
SCS review	This action covers all of the concerns over the use of the FSC trademark and logo on the CLF website. As a result, CAR 2014.1 is closed.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.2	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US 8.1.a.
<p>Non-Conformity: The complete monitoring protocol is not in a written form. There is a monitoring program that is utilized for various aspects of the monitoring required under FSC US 8.2, but the protocol is not written to cover all aspects of the monitoring requirement. CLF and the Collins Companies are examining alternatives for the Modoc Tract at this time. The results of this may lead to some changes in the monitoring needs for the Modoc Tract. This has resulted in delays to accomplish some of the requirements detailed in CAR 2013.4 and CAR 2013.5. As a result these two CARS were closed and a new CAR established to require the written monitoring protocol and monitoring data to</p>	

match the requirements of FSC 8.1.a and FSC 8.2	
Corrective Action Request: CLF must provide a written protocol to cover all aspects of the monitoring required under FSC US 8.2, following resolution of the conservation easement.	
FME response <i>(including any evidence submitted)</i>	CLF has a written protocol for monitoring of various resources, including timber, RSA's, HCVF's, RTE species, and invasive species. The addition of the Conservation Easement on the Modoc Tract with the Pacific Forest Trust, LLC, covers monitoring on the Modoc Tract including the Barry Point Fire burned over lands. This brings the monitoring program up to date.
SCS review	This provides written documentation of the monitoring protocol for the CLF lands. Additional protocols will have to be developed as the stands restored on the Modoc Tract grow. Timber resource monitoring for even-aged stands is not covered by current monitoring protocol. As a result of these actions, CAR 2014.2 is closed.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.3	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): SCS must be notified within 90 days of any significant change in ownership or management.
FSC Indicator:	FSC US 1.6.c
Non-Conformity: CLF is looking into an alternative for a conservation easement on some of the lands of CLF. If such an easement is entered into by CLF, they are required to notify SCS of any such significant changes in ownership or management planning within 90 days of the change.	
Corrective Action Request: The FME is required to notify SCS of significant changes in ownership or management planning within 90 days of such change.	
FME response <i>(including any evidence submitted)</i>	CLF did enter into a Conservation Easement agreement and contract with the Pacific Forest Trust, LLC on December 29, 2014. SCS received notification of this agreement and change to ownership and management via email from Lee Fledderjohann, CLF, to Robert Hrubes and Brendan Grady on January 29, 2015.
SCS review	As a result of this action by CLF, OBS 2014.3 is closed.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.4

Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US 6.3.h
Non-Conformity: CLF is monitoring the location, abundance, and identification of invasive species as required under FSC 8.2.c.3. CLF received a grant from the local Resource Advisory Committee to monitor and control invasive species on the FMU. The monitoring is being done and the locations and information on the infestation is recorded on the mapping system. However, no control activities have taken place to eradicate or control the spread of the invasive species on the FMU for the past two years.	
Corrective Action Request: The FME must implement the control activities as outlined in the management plan for invasive species.	
FME response <i>(including any evidence submitted)</i>	CLF has been actively controlling invasive species, such as Dyer’s woad and musk thistle on the Barry Point burn area on the Modoc Tract. CLF has also signed a contract for other invasive control efforts on the Fremont Lumber Tract to commence in Fall 2015. Ongoing hexazinone treatments on the Modoc tract will help control other invasive species that are present.
SCS review	As a result of the control efforts that have taken place and are planned on the Modoc Tract and the planned efforts on the Fremont Lumber Tract, CAR 2014.4 is closed.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision <i>(refer to description above)</i>

Finding Number: 2014.5	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US 6.5.e.1.a and FSC US 6.5.e.1.b
Non-Conformity: During the 2014 annual surveillance audit a haul road was examined which was within the inner buffer SMZ as well as in the outer buffer SMZ on a Class A stream. In both situations, disturbance of mineral soil is to be avoided and where disturbance is unavoidable (as is the case on a road surface), mulch and seed are applied before the rainy season. In discussions with staff, there were currently no plans to do the required mulching and seeding.	
Corrective Action Request: Where disturbance of mineral soil is unavoidable (as is the case on a road surface), mulch and seed must be applied before the rainy season. In discussions with staff, there were currently no plans to do the required mulching and seeding.	
FME response <i>(including any evidence submitted)</i>	CLF determined that the road associated with the Bauer's Creek Sale was needed for ongoing access and as a result rocked the road within the SMZ. The road management plan portion of the overall management plan includes treatments for roads in the SMZ.
SCS review	As a result of the actions taken by CLF, OBS 2014.5 is closed.
Status of CAR:	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2014.6	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US 6.3.1.g.1.a
Non-Conformity: During the 2014 annual surveillance audit an even-aged unit of management of 27 acres was examined. The reserve basal area in the unit is required to 10 to 30% of the pre-harvest basal area. While not definitively evident, observations and discussions on the topic lead the auditor to the conclusion that the reserve basal area did not appear to be above 10%, as required. The pre-harvest basal area was not available and ocular estimates of reserve basal area were made.	
Corrective Action Request: Where even-aged management units are utilized, the FME should be able to demonstrate that the reserve basal area fails within the range of 10 to 30% of the pre-harvest basal area.	
FME response <i>(including any evidence submitted)</i>	No action has been taken on this observation at this time.
SCS review	This item is not a requirement in the management plan; however, the appropriate actions must be taken prior to harvest and following harvest to assure that the standard of retention is met. CLF needs to document the procedure somewhere in their planning and management policies. As a result this observation is upgraded to CAR 2015.1
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input checked="" type="checkbox"/> Other decision <i>(refer to description above)</i>

4.2 New Corrective Action Requests and Observations

Finding Number: 2015.1	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US 6.3.g.1
<p>Non-Conformity: During the 2014 annual surveillance audit an even-aged unit of management of 27 acres was examined. The reserve basal area in the unit is required to 10 to 30% of the pre-harvest basal area. While not definitively evident, observations and discussions on the topic lead the auditor to the conclusion that the reserve basal area did not appear to be above 10%, as required. The pre-harvest basal area was not available and ocular estimates of reserve basal area were made. This was OBS 2014.6 and was not acted upon by CLF. As a result this OBS was upgraded to a CAR.</p>	
<p>Corrective Action Request: Where even-aged management units are utilized, the FME must be able to demonstrate that the reserve basal area fails within the range of 10 to 30% of the pre-harvest basal area. CLF must document somewhere in their silvicultural treatment descriptions the necessity for retention of a minimum of 10% of the pre-harvest basal area.</p>	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2015.2	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US 7.4.a
<p>Non-Conformity: The management plan public summary is not consistent with the management plan itself in the area of the SMZ specifications utilized on the forest. The management plan includes a discussion which demonstrates that the CLF complies with the FSC, State of California and State of Oregon in this regard.</p>	
<p>Corrective Action Request: CLF must maintain the publicly available management plan summary so that it is consistent with the material contained in the official management plan.</p>	

FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2015.3	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US 7.1.m
<p>Non-Conformity: The CLF management plan has not been updated to reflect the Goose Lake Tract purchase, nor have the adjustments to the forest growth and inventory been updated to reflect the losses associated with the Barry Point Fire of 2013. Both of these need to be included in the management plan documentation of the annual allowable cut calculations. Discussions during the audit demonstrated these adjustments had been incorporated in the requirements of Criterion 5.6; however, this is not reflected in the management plan.</p>	
<p>Corrective Action Request: The section in the CLF management plan that describes how the species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6 must be updated to reflect the Goose Lake Tract purchase and the losses associated with the Barry Point fire.</p>	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2015.4	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US 9.1.c
<p>Non-Conformity: The public summary of the CLF management plan does not list any specific types of management activities that might be carried out in either an RSA or a HCV. The public summary states that various activities might take place to protect or enhance the attributes of these types of resources. The public summary of the management plan is supposed to outline the elements of the plan described in Criteria 7.1 and 9.3.</p>	
<p>Corrective Action Request: Since there are specific actions that are planned on an as needed basis to protect or enhance the attributes of RSA's and HCV's included in the CLF management plan, these must be listed in the public summary to inform the public of the types of activities that might be observed by them.</p>	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

Finding Number: 2015.5	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US 7.3.a
<p>Non-Conformity: CLF maintains training records for the Lands Manager and the Resource Manager and has these included in the CLF management plan. These are not up-to-date in the management plan. No other training records are available to document that all forest workers are provided with sufficient guidance and supervisions to adequately implement their respective components of the management plan.</p>	
<p>Corrective Action Request: CLF should document the training provided to other employees and contractors.</p>	

FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2015.6	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US 7.2.a
Non-Conformity: CLF signed and entered into a conservation easement with the Pacific Forest Trust, LLC for the Modoc Tract on December 31, 2014. This has specific management and monitoring requirements included in the agreement. These have not been added to the management plan at this time.	
Corrective Action Request: CLF must update the management plan to reflect the agreement for the conservation easement entered into with the Pacific Forest Trust, LLC. For the Modoc Tract.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

Finding Number: 2015.7	
Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC US 7.1.g
Non-Conformity: The management plan does address some insect and disease problems to the extent required; however, the discussion is very limited and does not cover all the requirements included in the indicator.	
Corrective Action Request: CLF must expand the discussion in the management plan related to diseases and insects to include descriptions, current or anticipated outbreaks, management goals and the methodology for management.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

5. Stakeholder Comments

In accordance with SCS protocols, consultation with key stakeholders is an integral component of the evaluation process. Stakeholder consultation takes place prior to, concurrent with, and following field evaluations. Distinct purposes of such consultation include:

- To solicit input from affected parties as to the strengths and weaknesses of the FME’s management, relative to the 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 (HCVFs).

Principal stakeholder groups are identified based upon results from past evaluations, lists of stakeholders from the FME under evaluation, 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 in this evaluation:

5.1 Stakeholder Groups Consulted

	Collins Lakeview employees

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used. The table below summarizes the major comments received from stakeholders and the assessment team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

5.2 Summary of Stakeholder Comments and Responses from the Team, Where Applicable

FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual audit.

6. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual audit team recommends that the certificate be sustained, subject to subsequent annual audits and the FME’s response to any open CARs.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Comments:	

7. Changes in Certification Scope

Any changes in the scope of the certification since the previous audit are highlighted in yellow in the tables below.

Name and Contact Information

Organization name	Collins Pine Company, Collins Lakeview Forest		
Contact person	Lee Fledderjohann, Resource Manager		
Address	Collins Timber Group	Telephone	541-947-2018
	P.O. Box 1340	Fax	541-947-2832
	Lakeview, OR 97630	e-mail	lfledderjohann@collinsco.com
	USA	Website	http://www.collinswood.com

FSC Sales Information

<input checked="" type="checkbox"/> FSC Sales contact information same as above.			
FSC salesperson			
Address		Telephone	

		Fax	
		e-mail	
		Website	

Scope of Certificate

Certificate Type	<input checked="" type="checkbox"/> Single FMU	<input type="checkbox"/> Multiple FMU
	<input type="checkbox"/> Group	
SLIMF (if applicable)	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate
	<input type="checkbox"/> Group SLIMF certificate	
# Group Members (if applicable)		
Number of FMUs in scope of certificate	1	
Geographic location of non-SLIMF FMU(s)	Latitude: 120.3802 West Longitude: 42.1868 North	
Forest zone	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical
Total forest area in scope of certificate which is:	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac	
privately managed	97,426	
state managed		
community managed		
Number of FMUs in scope that are:		
less than 100 ha in area	100 - 1000 ha in area	
1000 - 10 000 ha in area	more than 10 000 ha in area	1
Total forest area in scope of certificate which is included in FMUs that:	Units: <input type="checkbox"/> ha or <input type="checkbox"/> ac	
are less than 100 ha in area		
are between 100 ha and 1000 ha in area		
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs		
Division of FMUs into manageable units:		
The Lakeview land base is comprised of four tracts:		
<ul style="list-style-type: none"> < Fremont Lumber Company lands: approximately 24,000 acres of land lying northwest of Lakeview. These lands have been under Collins ownership since the 1930's. < The ex-Louisiana Pacific lands: approximately 23,000 acres lying northeast of Lakeview, acquired in the 1980's. This tract was heavily harvested prior to acquisition. < The ex-Weyerhaeuser or "Modoc" lands: approximately 36,000 acres located in California, southwest of Lakeview, acquired in the late 1980's. This tract was heavily harvested prior to acquisition. < The Goose Lake Tract: approximately 11,000 acres located southwest of Lakeview, acquired in 2010. This tract has been managed with both even and uneven age silviculture. 		

Non-SLIMF Group Members

Name	Contact information	Latitude / longitude of Non-SLIMF FMUs
NA		

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Production Forests

Timber Forest Products	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	97,426
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	5,817
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	91,609
Silvicultural system(s)	Area under type of management
Even-aged management	5,817
Clearcut (clearcut size range)	0
Shelterwood	1,921
Other:	3,896
Uneven-aged management	91,609
Individual tree selection	91,609
Group selection	
Other:	
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	
Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	0
Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest rates estimates are based:	
2% of standing inventory	
Species in scope of joint FM/COC certificate: (<i>Scientific / Latin Name</i> and Common / Trade Name)	
<i>Pinus ponderosa</i> (<i>ponderosa pine</i>), <i>Pinus contorta</i> (<i>lodgepole pine</i>), <i>Pinus lambertiana</i> (<i>sugar pine</i>), <i>Pinus monticola</i> (<i>western white pine</i>); <i>Abies concolor</i> (<i>white fir</i>) <i>Calocedrus decurrens</i> (<i>incense-cedar</i>); <i>Populus tremuloides</i> (<i>aspen</i>)	

FSC Product Classification

Timber products		
Product Level 1	Product Level 2	Species
W1	W1.1 Logs	All

W1	W1.2 Fuelwood	All
W3	W3.1 Wood Chips	All
Non-Timber Forest Products		
Product Level 1	Product Level 2	Product Level 3 and Species
None	None	None

Conservation Areas

Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives:		505.9 ac		
High Conservation Value Forest / Areas				
High Conservation Values present and respective areas:		Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac		
	Code	HCV Type	Description & Location	Area
<input type="checkbox"/>	HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).		
<input type="checkbox"/>	HCV2	Forests or areas containing globally, regionally or nationally significant 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.		
<input type="checkbox"/>	HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.		
<input checked="" type="checkbox"/>	HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	Various. Refer to SMA/HCVF GIS Layer.	1,267
<input type="checkbox"/>	HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		
<input type="checkbox"/>	HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		
Total Area of forest classified as 'High Conservation Value Forest / Area'				1,267

Areas Outside of the Scope of Certification (Partial Certification and Excision)

<input type="checkbox"/> <i>N/A – All forestland owned or managed by the applicant is included in the scope.</i>
<input checked="" type="checkbox"/> <i>Applicant owns and/or manages other FMUs not under evaluation.</i>

<input type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.		
Explanation for exclusion of FMUs and/or excision:		
Control measures to prevent mixing of certified and non-certified product (C8.3):		
Description of FMUs excluded from, or forested area excised from, the scope of certification:		
Name of FMU or Stand	Location (city, state, country)	Size (<input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac)
Collins Kane	Kane, Pennsylvania, USA	117,800
Collins Almanor	Chester, California, USA	94,000

8. Annual Data Update

8.1 Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
# of male workers - 72	# of female workers - 3	
Number of accidents in forest work since last audit:	Serious: 0	Fatal: 0

8.2 Annual Summary of Pesticide and Other Chemical Use

<input type="checkbox"/> FME does not use pesticides.				
Commercial name of pesticide / herbicide	Active ingredient	Quantity applied annually (kg or lbs)	Size of area treated during previous year	Reason for use
Glyphosate	Glyphosate	50,472	12,720	Site Prep
Rotary 2SL	Imazapyr	25,236	12,720	Site Prep
Super Spread MSO	Methyl Soyate, Nonylphenol Ethoxylate	60,670	12,720	Site Prep

SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – List of FMUs Selected For Evaluation

FME consists of a single FMU

FME consists of multiple FMUs or is a Group

Appendix 2 – List of Stakeholders Consulted

List of FME Staff Consulted

Name	Title	Contact Information	Consultation method
Lee Fledderjohann	Resource Manager	541-947-2018 lfledderjohann@collinsco.com	Personal communication during field audit
Travis Erickson	Lands Manager	541-947-2018 terickson@collinsco.com	Personal communication during field audit

List of other Stakeholders Consulted

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
None				

Appendix 3 – Additional Audit Techniques Employed

No additional audit techniques were employed.

Appendix 4 – Pesticide Derogations

<input type="checkbox"/> There are no active pesticide derogations for this FME.		
Name of pesticide / herbicide (active ingredient)		Date derogation approved
2,4-D 2-ethylhexyl ester		January 5, 2010
Condition	Conformance (C / NC)	Evidence of progress
No pesticides requiring derogations were utilized.	C	None of the pesticide requiring derogation for use was used on the CLF.

Appendix 5 – Detailed Observations

Evaluation Year	FSC P&C Reviewed
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2012	All – (Re)certification Evaluation
2013	P 2 and 5, C6.2, C6.3, C6.9, and C9.4
2014	P1, P4, P8, C6.2, C6.3, C6.9, and C9.4
2015	P 7 and 9, C6.2, C6.3, and C6.9
2016	P3 and 6 and C9.4

C= Conformance with Criterion or Indicator
 NC= Nonconformance with Criterion or Indicator
 NA = Not Applicable
 NE = Not Evaluated

FSC Principles Checklist

FSC Forest Management Standard (v1.0)—United States

REQUIREMENT	C/NC	COMMENT/CAR
Principle #1: Compliance with Laws and FSC Principles 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.		
Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.		
Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.		
Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.		
Principle #5: 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.		
Principle #6: 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.		
6.2 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.	C	
6.2.a If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the	C	There were several locations in the Modoc Tract where herbicide application was planned this year that had potential of having RTE plants due to the unique habitat character. When these were located, a

<p>assumption that potential RTE species are present.</p> <p>Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p>		<p>botanist from Cal Fish and Wildlife was contacted and surveyed the areas. One CNPS list 2B.2 plant. Woolly stenosus, was located. Other areas were also surveyed to look for other potential RTE species.</p>
<p>6.2.b When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. Conservation zones and/or protected areas are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.</p>	C	<p>Once RTE Species were located in the overall spray are actions were taken to prevent damage to the resource. These areas were mapped and excluded from the treatment and buffered to prevent any drift from the herbicide. Some of the potential areas are under consideration for inclusion as RSA's or HCV's.</p>
<p>6.2.c For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as landscape level biodiversity conservation goals.</p>	NA	
<p>6.2.d Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).</p>	C	<p>No management, recreation or hunting/collecting (to the best of the knowledge of CLF occurred that would impact RTE species.</p>
<p>6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</p>	C	
<p>6.3.a. Landscape-scale indicators</p>	C	
<p>6.3.a.1 The forest owner or manager maintains, enhances, and/or restores under-represented successional stages in the FMU that would</p>	C	<p>CLF continued efforts to enhance aspen trees and stands. Activities include the reduction or elimination of conifers impacting aspen</p>

<p>naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.</p>		<p>growth or regeneration as part of planned harvest activities. These areas were mapped and excluded from the herbicide treatments in the Modoc Tract. Aspen is identified as a special habitat management zone, with specific management activities in the conservation easement with PFT.</p> <p>Some management has been done in SMZ canopies to restore and enhance vertical and horizontal canopy structure. SMZ's were also identified in the conservation easement for special protection and management. Meadows and meadow edges are special habitat management zones with management guidelines outlined in the conservation easement. Rock scab areas are provide unique habitats in the Modoc Tract and were protected during the spray operations.</p> <p>Groups of snags were retained during the salvage operations on the Barry Point Fire to provide habitat areas for black-backed woodpeckers.</p>
<p>6.3.a.2 When a <i>rare ecological community</i> is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, conservation zones and/or protected areas are established where warranted.</p>	<p>C</p>	<p>The conservation easement requires special management activities in the four special habitat management zones identified in the easement documents. CLF has also identified areas as HCV's and has outlined special management activities in the management plan for these. Included in the special management areas on the entire FMU are aspen stands, off-channel habitat (beaver ponds, oxbow lakes, stable backwater, sloughs and marshes), and rock habitat.</p>
<p>6.3.a.3 When they are present, management maintains the area, structure, composition, and processes of all Type 1 and Type 2 old growth. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones,</p>	<p>C</p>	<p>No management activities have taken place in or adjacent to old growth stands during the past year. CLF has no Type I old growth on the FMU. The one stand that is close to Type II old growth has no management activities</p>

<p>unless an alternative plan is developed that provides greater overall protection of old growth values.</p> <p>Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).</p> <p>Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).</p> <p>On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate).</p> <p>On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> 1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 	<p>planned. The conservation easement on the Modoc Tract does address leaving larger older trees on the area. Where living trees were present after the Barry Point Fire, they were retained to start to provide some of the diversity in age and size class desired.</p>
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<p>5. Conservation zones representative of old growth stands are established.</p> <p>6. Landscape level considerations are addressed.</p> <p>7. Rare species are protected.</p>		
<p>6.3.b To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.</p>	C	<p>Black-backed woodpecker habitat and living trees were retained during salvage operations on the Barry Point Fire. SMZ's, scab rock areas, aspen stands, and meadows were protected during the herbicide treatments for site preparation. These provide special habitat for wildlife species and RTE plant species. Aspen and SMZ's are identified and have special management on the entire FMU along with off-channel water features and rock habitat.</p>
<p>6.3.c Management maintains, enhances and/or restores the plant and wildlife habitat of Riparian Management Zones (RMZs) to provide:</p> <ul style="list-style-type: none"> a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent aquatic habitats; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and, e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem. 	C	<p>SMZ's were protected during the herbicide application on the Modoc Tract, and they are identified as a special habitat management zone in the conservation easement. SMZ's are also identified in the management plan for the FMU for special management activities to restore, protect and enhance them. Special management activities included treatment to promote habitat for owlets.</p> <p>Canopy management has been conducted within several riparian areas. The goal of these activities is to maintain a dynamic horizontal and vertical canopy structure.</p> <p>SMZ guidelines in use on the forest include those required by FSC, California and Oregon. These are outlined in the management plan, and the FSC guidelines are implemented across the FMU.</p>
<p>Stand-scale Indicators</p> <p>6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>	C	<p>See discussion under 6.3.a.1, 6.3.a.2, and 6.3.c.</p>

<p>6.3.e When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. Native species suited to the site are normally selected for regeneration.</p>	<p>C</p>	<p>Local seed sources were used to regenerate conifer stands, where natural regeneration needed supplementation.</p> <p>The amount of seed required to restore the forest on the Barry Point Fire did require departure from the usual local seed sourcing. There was not enough seed available. CLF worked with the silviculturalist on the Fremont NF to locate appropriate seed based on guidelines for sourcing seeds when adequate local seed is not available.</p>
<p>6.3.f Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include:</p> <ul style="list-style-type: none"> a) large live trees, live trees with decay or declining health, snags, and well-distributed coarse down and dead woody material. Legacy trees where present are not harvested; and b) vertical and horizontal complexity. <p>Trees selected for retention are generally representative of the dominant species found on the site.</p>	<p>C</p>	<p>Snags and large downed woody debris are normally left in place during operations. These are addressed in the Management Plan. Areas of snags were retained on the Barry Point Fire to provide black-backed woodpecker habitat areas.</p> <p>Canopy management was done in limited SMZ's to maintain and enhance vertical and horizontal canopy structure.</p> <p>The conservation easement requires retention of large trees on the Modoc Tract. Retention of live trees following the Barry Point Fire will help provide vertical and horizontal complexity</p>
<p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when even-aged systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and</p>	<p>NC</p>	<p>Live trees are routinely retained during salvage operations to provide vertical and horizontal diversity in the forest. The salvage operations on the Barry Point Fire clearly demonstrate this retention policy.</p> <p>No method of documenting the pre-harvest basal area is present when even-aged management systems are utilized. The FMU must be able to demonstrate that the post-harvest basal area retention is at least 10% of the pre-harvest basal area. OBS 2014.6 is upgraded to CAR 2015.1 as a result of the lack</p>

<p>configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>		<p>of response to the Observation.</p>
<p>6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the best available information including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings. 	<p>C</p>	<p>No regeneration blocks in even-aged harvests have exceeded 40 acres in size or other restrictions on even-aged management.</p>
<p>6.3.h The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control invasive species, including:</p> <ol style="list-style-type: none"> 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 	<p>C</p>	<p>Surveys for invasive species are conducted as a part of regular field operations. When located a specific plan is developed to address the invasive species control and management.</p> <p>The exploration of the cost and efficacy of using livestock (goats) is being conducted for the control/eradication of Dyer’s woad.</p> <p>Extensive control operations were associated with the restoration efforts on the Barry Point Fire. Specifically Dyer’s woad and musk</p>

<p>4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.</p>		<p>thistle were targeted during the operations. More effort to control these will occur with velpar treatments later in 2015. Other invasive controls are also planned for fall 2015 on the FMU. A contract has already been signed for this work. The FMU has received grants for invasive survey and control efforts.</p>
<p>6.3.i In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.</p>	<p>C</p>	<p>The chip operations on the Bug Springs harvest area was designed primarily as a thinning from below and as a result did reduce fuel ladders in the area of operations.</p> <p>Rehabilitation and reforestation on the Barry Point Fire to prevent brush invasion is planned over extensive areas of the burn. This will reduce fuel loading and help protect young stands after planting.</p>
<p>6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</p>	<p>C</p>	
<p>6.9.a The use of exotic species is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.</p>	<p>NA</p>	<p>No exotic species are used on the FMU. The conservation easement on the Modoc Tract bans the use of exotic species.</p>
<p>6.9.b If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.</p>	<p>NA</p>	
<p>6.9.c The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species</p>	<p>NA</p>	
<p>Principle #7: 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.</p>		
<p>7.1. The management plan and supporting documents shall provide:</p> <ul style="list-style-type: none"> a. Management objectives. b. Description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic 	<p>C</p>	

<p>conditions, and a profile of adjacent lands.</p> <p>c. Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories.</p> <p>d. Rationale for rate of annual harvest and species selection.</p> <p>e. Provisions for monitoring of forest growth and dynamics.</p> <p>f. Environmental safeguards based on environmental assessments.</p> <p>g. Plans for the identification and protection of rare, threatened and endangered species.</p> <p>h. Maps describing the forest resource base including protected areas, planned management activities and land ownership.</p> <p>i. Description and justification of harvesting techniques and equipment to be used.</p>		
<p>7.1.a The management plan identifies the ownership and legal status of the FMU and its resources, including rights held by the owner and rights held by others.</p>	C	<p>Fremont Lumber Company was formed under Collins Pine Company in the late 1930's to purchase the 24,000 acre Dusenbury tract of timberland north of Lakeview. The 18,000 acre Louisiana-Pacific tract came with the purchase of LP's sawmill by Ostrander Resources Company in 1987. In 2010 Collins acquired the former Goose Lake Timber property. In 2011 Collins acquired the former DG Shelter/Jeld-Wen properties in California. A majority of this property was surrounded by the Modoc tract and was a natural fit for the company.</p>
<p>7.1.b The management plan describes the history of land use and past management, current forest types and associated development, size class and/or successional stages, and natural disturbance regimes that affect the FMU (see Indicator 6.1.a).</p>	C	<p>The history of the land use of the CLF lands is included in the section of the management plan (MP) that covers the acquisition of those lands from the former owners.</p> <p>The forest types and associated species as well as the successional stages represented is included in the description of the Forest Resources in the MP.</p> <p>The natural disturbance factors affecting the forest resources are discussed in a number of places in the management plan.</p>
<p>7.1.c The management plan describes: a) current conditions of the timber and non-timber forest resources being managed; b) desired future</p>	C	<p>The management plan discusses the current forest resource conditions thoroughly and the reasons for the current conditions based on</p>

<p>conditions; c) historical ecological conditions; and d) applicable management objectives and activities to move the FMU toward desired future conditions.</p>		<p>past management and natural disturbance factors. The future desired conditions are not discussed in one section of the management plan, rather the discussion is dispersed throughout the discussion of the silviculture and management options for various tracts and silvicultural options.</p> <p>The management objectives and near and long-term goals are covered in the early sections of the management plan to set the stage for the discussions that follow.</p>
<p>7.1.d The management plan includes a description of the landscape within which the FMU is located and describes how landscape-scale habitat elements described in Criterion 6.3 will be addressed.</p>	<p>C</p>	<p>The landscape within which the FMU is located is discussed throughout the management plan and Appendix L is titled Landscape Level Analysis and includes a discussion of the position of the FMU in the landscape with surrounding land managers and the discussions that take place with other land managers.</p>
<p>7.1.e The management plan includes a description of the following resources and outlines activities to conserve and/or protect:</p> <ul style="list-style-type: none"> • rare, threatened, or endangered species and natural communities (see Criterion 6.2); • plant species and community diversity and wildlife habitats (see Criterion 6.3); • water resources (see Criterion 6.5); • soil resources (see Criterion 6.3); • Representative Sample Areas (see Criterion 6.4); • High Conservation Value Forests (see Principle 9); • Other special management areas. 	<p>C</p>	<p>All of the items in 7.1.e are discussed in detail in the management plan, for example, Appendix F covers the HCVF's with a list of the types, and the management activities planned to restore, enhance and protect the attributes.</p>
<p>7.1.f If invasive species are present, the management plan describes invasive species conditions, applicable management objectives, and how they will be controlled (see Indicator 6.3.j).</p>	<p>C</p>	<p>Appendix K covers the Invasive Weed Management Plan. The appendix includes tables of listed invasives as well as monitoring and control strategies.</p>
<p>7.1.g The management plan describes insects and diseases, current or anticipated outbreaks on forest conditions and management goals, and how insects and diseases will be managed (see Criteria 6.6 and</p>	<p>C</p>	<p>The discussion on insects and diseases is not organized into a separate section. Some specific insects and the control plans and efforts are discussed. Diseases likewise are not discussed in a</p>

6.8).		separate sections. The discussion could be more detailed, as a result OBS 2015.7 is issued.
7.1.h If chemicals are used, the plan describes what is being used, applications, and how the management system conforms to Criterion 6.6.	C	The MP indicates that herbicides and insecticides will be utilized as necessary. The specific prescription prepared for the operations includes all the information required in Criterion 6.6. No chemicals on the FSC list of Highly Hazardous Pesticides are used.
7.1.i If biological controls are used, the management plan describes what is being used, applications, and how the management system conforms to Criterion 6.8.	C	No biological controls are utilized on the FMU.
7.1.j The management plan incorporates the results of the evaluation of social impacts, including: <ul style="list-style-type: none"> • traditional cultural resources and rights of use (see Criterion 2.1); • potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2); • management of ceremonial, archeological, and historic sites (see Criteria 3.3 and 4.5); • management of aesthetic values (see Indicator 4.4.a); • public access to and use of the forest, and other recreation issues; • local and regional socioeconomic conditions and economic opportunities, including creation and/or maintenance of quality jobs (see Indicators 4.1.b and 4.4.a), local purchasing opportunities (see Indicator 4.1.e), and participation in local development opportunities (see Indicator 4.1.g). 	C	All aspects of the evaluation and reporting on the social impacts of the CLF are included in the MP. Included sections are non-timber resources, wildlife, fisheries, cultural and historical, educational, water, recreation, and research. The MP is a 2013 version.
7.1.k The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).	C	The MP includes a Transportation System Management Plan as well as a road condition reporting form for use in the field.
7.1.l The management plan describes the silvicultural and other management systems used and how they will sustain, over the long term, forest ecosystems present on the FMU.	C	There is extensive discussion on the silvicultural and other management systems utilized to manage the resources of the CLF. This discussion includes descriptions of the activities and the expected outcomes. Sustainability of the productivity of the

		resource base of the CLF is included in the mission statement and in the major objectives listed in the MP.
7.1.m The management plan describes how species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.	NC	The management plan includes a discussion on the methodology utilized to calculate the harvest rates and the species selections. The calculations have been updated for the land acquisitions made by the CLF and the losses in the Barry Point Fire; however, these adjustments have not been included in the current version of the MP. Therefore CAR 2015.3 is issued.
D7.1.n The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.	C	The MP does include written monitoring protocols for all the resources listed in Criterion 8.2. As the restored forest on the Modoc Tract is established and grows, a monitoring protocol will have to be developed for the growth rates of the even-aged stands that result. The current forest resource inventory protocol is written for uneven-aged stands and involves measurement post-harvest to update the inventory database.
7.1.o The management plan includes maps describing the resource base, the characteristics of general management zones, special management areas, and protected areas at a level of detail to achieve management objectives and protect sensitive sites.	C	CLF maintains a GIS database from which all the required maps are easily produced. The MP does include a limited number of maps as do the conservation easement agreement documents.
7.1.p The management plan describes and justifies the types and sizes of harvesting machinery and techniques employed on the FMU to minimize or limit impacts to the resource.	C	The selection of harvesting machinery and the types of yarding to be employed are covered and justified in a section titled Harvesting and Yarding Systems in the MP.
7.1.q Plans for harvesting and other significant site-disturbing management activities required to carry out the management plan are prepared prior to implementation. Plans clearly describe the activity, the relationship to objectives, outcomes, any necessary environmental safeguards, health and safety measures, and include maps of adequate detail.	C	Timber harvest and site preparation activities in California and Oregon require that a THP, prescription or intent to harvest notification be filed with the appropriate entity prior to the commencement of activities in the forest. The documents all are considered part of the confidential MP at the time of submission.
7.1.r The management plan describes the	C	The stakeholder processes and contacts utilized are

stakeholder consultation process.		described in the Landscape Level Analysis Appendix of the MP
7.2 The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.	NC	
7.2.a The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.	NC	CLF considers the MP a dynamic document with major revisions to take place every 5 to 10 years. This is stated in the Objectives section of the MP. The CLF has just recently changed the management of the Modoc Tract through entering into a conservation easement with the Pacific Forest Trust, LLC. The plan has not be updated to reflect this change in management. As a result, CAR 2015.6 is issued.
7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.	C	
7.3.a Workers are qualified to properly implement the management plan; All forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan.	C	Training records are maintained for the Resource Manager and the Land Manager, and these are included in the MP. No other training records were available for the audit. As a result OBS 2015.5 is issued.
7.4 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the primary elements of the management plan, including those listed in Criterion 7.1.	C	
7.4.a While respecting landowner confidentiality, the management plan or a management plan summary that outlines the elements of the plan described in Criterion 7.1 is available to the public either at no charge or a nominal fee.	NC	The public summary of the MP is not consistent with the official MP in regards to the SMZ's utilized in the FMU. The MP has a complete description of the SMZ's for FSC, Oregon and California and a statement that the FSC standards are utilized across the FMU. This is not consistent with what is stated in the public summary of the MP. As a result CAR 2015.2 is issued.
7.4.b Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for public review	C	CLF is required to make these available in California through the THP process. Cal Fire publishes these on their website and

<p>and comment prior to their implementation. Managers address public comments and modify the plans to ensure compliance with this Standard.</p>		<p>schedules public hearings to receive public comment and feedback. ODF also publishes notification on a website and solicits public comment. The consultation process includes public input.</p>
<p>Principle #8: 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. <i>Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.</i></p>		
<p>Principle #9: 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.</p> <p>High Conservation Value Forests are those that possess one or more of the following attributes:</p> <ol style="list-style-type: none"> 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) Forest areas that are in or contain rare, threatened or endangered ecosystems c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control) 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>Examples of forest areas that may have high conservation value attributes include, but are not limited to:</p> <p>Central Hardwoods:</p> <ul style="list-style-type: none"> • Old growth – (see Glossary) (a) • Old forests/mixed age stands that include trees >160 years old (a) • Municipal watersheds –headwaters, reservoirs (c) • Rare, Threatened, and Endangered (RTE) ecosystems, as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund's Forest Communities of Highest Conservation Concern, and/or Great Lakes Assessment (b) • Intact forest blocks in an agriculturally dominated landscape (refugia) (a) • Intact forests >1000 ac (valuable to interior forest species) (a) • Protected caves (a, b, or d) • Savannas (a, b, c, or d) • Glades (a, b, or d) • Barrens (a, b, or d) • Prairie remnants (a, b, or d) <p>North Woods/Lake States:</p> <ul style="list-style-type: none"> • Old growth – (see Glossary) (a) • Old forests/mixed age stands that include trees >120 years old (a) • Blocks of contiguous forest, > 500 ac, which host RTEs (b) 		

- **Oak savannas (b)**
- **Hemlock-dominated forests (b)**
- **Pine stands of natural origin (b)**
- **Contiguous blocks, >500 ac, of late successional species, that are managed to create old growth (a)**
- **Fens, particularly calcareous fens (c)**
- **Other non-forest communities, e.g., barrens, prairies, distinctive geological land forms, vernal pools (b or c)**
- **Other sites as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund’s Forest Communities of Highest Conservation Concern (b)**

Note: In the Lake States-Central Hardwoods region, old growth (see Glossary) is both rare and invariably an HCVF.

In the Lake States-Central Hardwoods region, cutting timber is not permitted in old-growth stands or forests.

Note: Old forests (see Glossary) may or may not be designated HCVFs. They are managed to maintain or recruit: (1) the existing abundance of old trees and (2) the landscape- and stand-level structures of old-growth forests, consistent with the composition and structures produced by natural processes.

Old forests that either have or are developing old-growth attributes, but which have been previously harvested, may be designated HCVFs and may be harvested under special plans that account for the ecological attributes that make it an HCVF.

Forest management maintains a mix of sub-climax and climax old-forest conditions in the landscape.

<p>9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</p>	<p>C</p>	
<p>9.1.a The forest owner or manager identifies and maps the presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F.</p> <p>Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.</p>	<p>C</p>	<p>CLF carried out an extensive assessment process to identify RSA’s and HCVF attributes on the FMU. Due to the long history of forest management on the lands, some attributes, such as Type I and Type II old growth were not found. An extensive landscape analysis and consultation was carried out to further assess the presence or absence of attributes. As a result of this process several HCVF attributes were found to be present and these have been established on the FMU and management guidelines to restore, enhance and protect the attributes have been put in place. This process resulted in over 1200 acres of HCVF identification and protection.</p>
<p>9.1.b In developing the assessment, the forest owner or manager consults with qualified</p>	<p>C</p>	<p>See discussion under 9.1.a. This process is described in the MP.</p>

specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.		
9.1.c A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.	NC	The public summary of the FMU provides a listing of the types of HCVF's found on the forest. General types of management strategies to be employed are in the public summary; however, the specific management strategies that are included in the MP are not included in the public summary. As a result of the lack of specific management strategies in the public summary, CAR 2015.4 is issued.
9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.	C	
9.2.a The forest owner or manager holds consultations with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate options for the maintenance of their HCV attributes have been adopted.	C	CLF consulted with multiple attempts to assess the unique resources of the Modoc Plateau, these include the East Cascades-Modoc Plateau and West Cascades Ecoregional, Oregon Conservation Strategy the U.S.G.S. Oregon and California Gap Analysis Programs, and the California Wildlife Action Plan (CAWAP). The conservation easement established with PFT has included several more potential RSA and HCVF attributes to be considered for inclusion. Much consultation of experts and other agency personnel took place to establish the areas and to develop management strategies to restore, enhance and protect the attributes. The MP covers the process in detail.
9.2.b On public forests, a transparent and accessible public review of proposed HCV attributes and HCVF areas and management is carried out. Information from stakeholder consultations and other public review is integrated into HCVF descriptions, delineations and management.	NA	
9.3 The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.	C	

<p>9.3.a The management plan and relevant operational plans describe the measures necessary to ensure the maintenance and/or enhancement of all high conservation values present in all identified HCVF areas, including the precautions required to avoid risks or impacts to such values (see Principle 7). These measures are implemented.</p>	<p>C</p>	<p>Appendix F of the MP includes all the required information relevant to this indicator. The measures covered in the MP are implemented on the FMU. During the audit specific areas of HCVF and potential areas in the Modoc Tract were visited and assessment and protection were confirmed.</p>
<p>9.3.b All management activities in HCVFs must maintain or enhance the high conservation values and the extent of the HCVF.</p>	<p>C</p>	<p>Through consultation with experts and utilization of standard protection measures, such as SMZ's the management activities specified are designed to maintain and enhance HCVF values.</p>
<p>9.3.c If HCVF attributes cross ownership boundaries and where maintenance of the HCV attributes would be improved by coordinated management, then the forest owner or manager attempts to coordinate conservation efforts with adjacent landowners.</p>	<p>C</p>	<p>No HCVF attributes that cross ownership boundaries would be improved by coordinated management.</p>
<p>9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</p>	<p>C</p>	
<p>9.4.a The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.</p>	<p>C</p>	<p>CLF monitors HCVF attributes when management activities have the potential to cause a risk of loss of HCV attributes.</p>
<p>9.4.b When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.</p>	<p>C</p>	<p>No monitoring to date has indicated increasing risk to specific HCV attributes.</p>
<p>Principle #10: Plantations shall be planned and managed in accordance with Principles and Criteria 1-9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.</p>		

Appendix 6 – Chain of Custody Indicators for FMEs

Chain of Custody indicators were not evaluated during this annual audit.