

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

## *The Collins Pennsylvania Forest*

### *Kane Hardwood*

Kane, Pennsylvania, USA

### **SCS-FM/COC-00007N**

PO Box 807, Kane, PA 16735

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CERTIFIED	EXPIRATION
21 October 2021	20 October 2026

DATE OF FIELD EVALUATION
17-19 August 2021
DATE OF REPORT FINALIZATION
5 October 2021

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## Foreword

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SCS Global Services (SCS) is a certification body accredited by the Forest Stewardship Council to conduct forest management and chain of custody evaluations. Under the FSC / SCS certification system, forest management enterprises (FMEs) meeting international standards of forest stewardship can be certified as “well managed,” thereby permitting the FME’s use of the FSC endorsement and logo in the marketplace subject to regular FSC / SCS oversight.

SCS deploys interdisciplinary teams of natural resource specialists and other experts in forested regions all over the world to conduct evaluations of forest management. SCS evaluation teams collect and analyze written materials, conduct interviews with FME staff and key stakeholders, and complete field and office audits of subject forest management units (FMUs) as part of certification evaluations. Upon completion of the fact-finding phase of all evaluations, SCS teams determine conformance to the FSC Principles and Criteria.

### **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 30 days after issue of the certificate. Section B contains more detailed results and information for the use of by the FME.

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## SECTION A – PUBLIC SUMMARY

### 1. General Information

#### 1.1 Certificate Registration Information

##### Name and Contact Information

<b>Organization name</b>	Collins Pennsylvania Forest		
<b>Contact person</b>	Thomas C. Kase		
<b>Address</b>	95 Hardwood Drive	<b>Telephone</b>	814-837-0161
	PO Box 807	<b>Fax</b>	814-837-7506
	Kane, PA 16735	<b>e-mail</b>	tkase@collinsco.com
		<b>Website</b>	http://www.collinsco.com

##### FSC Sales Information

<input checked="" type="checkbox"/> FSC Sales contact information same as above.
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##### Scope of Certificate

<b>Certificate type</b>	<input checked="" type="checkbox"/> Single FMU	<input type="checkbox"/> Multiple FMU
	<input type="checkbox"/> Group	
<b>SLIMF if applicable</b>	<input type="checkbox"/> Small SLIMF certificate	<input type="checkbox"/> Low intensity SLIMF certificate
	<input type="checkbox"/> Group SLIMF certificate	
<b># Group Members (if applicable)</b>		
<b>Number of FMU's in scope of certificate</b>		
<b>Geographic location of non-SLIMF FMU(s)</b>	<i>Latitude &amp; Longitude: 41.6628° N, 78.8111° W (Main office)</i>	
<b>Forest zone</b>	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical
<b>Total forest area in scope of certificate which is:</b> Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac		
privately managed	118,126	
state managed		
community managed		
<b>Number of FMUs in scope that are:</b>		
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
<b>Total forest area in scope of certificate which is included in FMUs that:</b> 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
<b>Division of FMUs into manageable units:</b>
The Collins Pennsylvania Forest is comprised of three ownership groups and 161 individual tracts, all of which are managed as a single FMU by a single entity that holds the management rights. The ownership groups are the Collins Pine Co. lands (91,707 ac.), the Collins Pennsylvania Trust lands (23,308 ac.) and Collins Family lands (3,111 ac.).
Each tract is given its own identification symbol. For Company lands the nomenclature consists of the county name followed by a tract number (e.g. Forest 16). Company lands are located in Forest, McKean, Warren, Elk, Potter, Cameron and Clarion Counties. Trust lands are designated by the word "Trust" and a tract number (e.g. Trust 13). Trust lands are in Forest Co. (23,224 ac.) and Clarion Co. (84 ac.). Family lands are designated by the word "Family" and a tract number (e.g. Family 3). All Family lands are in Forest Co
In 2021, one Company tract was purchased that was adjacent to our McKean 33 tract and contained 162 acres. This purchase from Lyme Allegheny Land Company added 162 acres to the 2,150 acres already owned as a Company tract. Other changes are the result of survey projects and GPS data collection as part of continuous improvement in GIS data layers.

**Non-SLIMF FMUs (Group or Multiple FMU Certificates )**

Name	Contact information	Latitude/ longitude of Non-SLIMF FMUs
N/A		

**Social Information**

<b>Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):</b>		
male workers: # 87	female workers: # 2	
<b>Number of accidents in forest work since previous evaluation:</b>	Serious: # 0	Fatal: # 0

**Pesticide and Other Chemical Use**

<input type="checkbox"/> FME does not use pesticides.				
Commercial name of pesticide / herbicide	Active ingredient	Quantity applied since previous evaluation (kg or lbs.)	Total area treated since previous evaluation (ha or ac)	Reason for use
Accord	Glyphosate	2,753 lbs.	963 ac.	Control interfering vegetation to develop desirable regeneration. Control and/or eliminate invasive plants.
Oust	Sulfometuron methyl	151 lbs.	1,021 ac.	Control interfering vegetation to develop desirable regeneration.

				Control and/or eliminate invasive plants.
Assure II	Quizalofop P-Ethyl	1.9 lbs.	84 ac.	Control interfering vegetation to develop desirable regeneration. Control and/or eliminate invasive plants.

**Production Forests**

<b>Timber Forest Products</b>	<b>Units:</b> <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	107,575 available for harvest
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	0
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	107,575
<b>Silvicultural system(s)</b>	<b>Area under type of management</b>
Even-aged management	107,312
Clearcut (clearcut size range )	
Shelterwood	
Other:	
Uneven-aged management	263 (individual and group; uneven age prescriptions completed 2011-2020)
Individual tree selection	
Group selection	
Other:	
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
<b>Non-timber Forest Products (NTFPs)</b>	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	10,551
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
<b>Species in scope of joint FM/COG certificate: (Scientific / Latin Name and Common / Trade Name)</b>	
Black Cherry - Prunus serotina Red Maple - Acer rubrum Red Oak - Quercus rubra Sugar Maple - Acer saccharum White Ash - Fraxinus americana White Oak - Quercus alba Black Birch - Betula lenta	

Yellow Birch - <i>Betula allegheniensis</i> Yellow Poplar(Tulip Poplar )- <i>Liriodendron tulipifera</i> Cucumbertree - <i>Magnolia acuminata</i> American Beech - <i>Fagus grandifolia</i> Eastern Hemlock - <i>Tsuga canadensis</i> Eastern White Pine - <i>Pinus strobus</i> Chestnut Oak - <i>Quercus prinus</i> Black Oak - <i>Quercus velutina</i> Scarlet Oak - <i>Quercus coccinea</i> Basswood - <i>Tilia americana</i> Aspen, Bigtooth/Quaking - <i>Populus grandidentata/tremuloides</i>
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**FSC Product Classification**

Timber products		
Product Level 1	Product Level 2	Species
W1 Rough Wood	W1.1 roundwood (logs)	Includes all species listed in scope
W1	W1.2 Fuelwood	Includes all species listed in scope
W3 Wood chips	W3.1 Wood Chips	Includes all species listed in scope
Non-Timber Forest Products		
Product Level 1	Product Level 2	Product Level 3 and Species
N/A		

*Note: W1, W2, and W3 product groups usually do not require a separate evaluation to FSC-STD-40-004 (COC) if processing occurs in the field for FM/COC and CW/FM certificate types. N1-N10 (NTFPs) are eligible to be sold with FSC claims under FM/COC certification if reported here. Bamboo and NTFPs derived from trees (e.g. cork, resin, bark) may be eligible for FM/COC and CW/FM certification. NTFPs used for food and medicinal purposes are not eligible for CW/FM certification. Check with SCS if you have any products intended to be sold with an FSC claim outside of any of these categories.*

**Conservation and High Conservation Value Areas**

Conservation Area	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
<b>Total amount</b> of land in certified area protected from commercial harvesting of timber and managed primarily for conservation objectives (includes both forested and non-forested lands).*	10,551

*\*Note: Total conservation and HCV areas may differ since these may serve different functions in the FME’s management system. Designation as HCV may allow for active management, including commercial harvest. Conservation areas are typically under passive management, but may undergo invasive species control, prescribed burns, non-commercial harvest, and other management activities intended to maintain or enhance their integrity. In all cases, figures are reported by the FME as it pertains local laws & regulations, management objectives, and FSC requirements.*

High Conservation Value Forest / Areas			Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Code	HCV Type	Description & Location	Area
HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	After 2021 analysis of PA Natural Heritage Program updates / Reevaluation of	3,094

		RSA and improved GPS data collection	
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.		0
HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.		0
HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	Portions of three municipal watersheds and three cases of deeded water rights	728
HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		0
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).		0
<b>Total area of forest classified as 'High Conservation Value Forest / Area'</b>			<b>3,822</b>

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

N/A – All forestland owned or managed by the applicant is included in the scope.

**1.2 Standards Applicable**

All standards employed are available on the websites of FSC International ([www.fsc.org](http://www.fsc.org)) or SCS Global Services ([www.SCSglobalServices.com](http://www.SCSglobalServices.com)). All standards are available on request from SCS Global Services via the comment form on our website. When no national standard exists for the country/region, SCS Interim Standards are developed by modifying SCS' Generic Interim Standard to reflect forest management in the region and by incorporating relevant components of any Draft Regional/National Standard and comments from stakeholders. More than one month prior to the start of the field evaluation, SCS Draft Interim Standards are provided to stakeholders identified by FSC International, SCS, forest managers under evaluation, and the FSC National or Regional Office for comment. SCS' COC indicators for FMEs are based on the most current versions of the FSC Chain of Custody Standard, FSC Standard for Group Entities in Forest Management Groups (FSC-STD-30-005), and FSC Accreditation Requirements.

Standards applicable NOTE: Please include the full standard name and Version number and check all that apply.	<input checked="" type="checkbox"/> Forest Stewardship Standard(s), including version: FSC-US Forest Management Standard (v1-0; 2010)
	<input checked="" type="checkbox"/> SCS COC indicators for FMEs, V8-0
	<input checked="" type="checkbox"/> FSC Trademark Standard (FSC-STD-50-001 V2-0)
	<input type="checkbox"/> FSC standard for group entities in forest management groups (FSC-STD-30-005), V2-0



	<input type="checkbox"/> Other: N/A
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### 1.3 Conversion Table English Units to Metric Units

Length Conversion Factors		
To convert from	To	multiply by
Mile (US Statute)	Kilometer (km)	1.609347
Foot (ft.)	Meter (m)	0.3048
Yard (yd.)	Meter (m)	0.9144
Area Conversion Factors		
To convert from	To	multiply by
Square foot (sq. ft.)	Square meter (m <sup>2</sup> )	0.09290304
Acre (ac)	Hectare (ha)	0.4047
Volume Conversion Factors		
To convert from	To	multiply by
Cubic foot (cu ft.)	Cubic meter (m <sup>3</sup> )	0.02831685
Gallon (gal)	Liter (l)	4.546
Quick reference		
1 acre	= 0.404686 ha	
1,000 acres	= 404.686 ha	
1 board foot	= 0.00348 cubic meters	
1,000 board feet	= 3.48 cubic meters	
1 cubic foot	= 0.028317 cubic meters	

## 2. Description of Forest Management

### 2.1 Management Context

#### 2.1.1 Regulatory Context

<b>Pertinent Regulations at the National Level</b>	Endangered Species Act Clean Water Act (Section 404 wetland protection) Occupational Safety and Health Act National Historic Preservation Act Archaeological and Historic Preservation Act Americans with Disabilities Act U.S. ratified treaties, including Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and International Labour Organization (ILO) Lacey Act Land and Water Conservation Fund Act of 1965 Forest Resources Conservation and Shortage Relief Act National Resource Protection Act National Environmental Protection Act National Wild and Scenic River Act Native American Grave Protection and Repatriation Act Rehabilitation Act Architectural Barriers Act
<b>Pertinent Regulations at the State / Local Level</b>	<b>Pennsylvania:</b> PA Fish commission, PA Game commission, and PA DEP (e.g., Chapter 102 and 105 rules).

#### Regulatory Context Description

CPF regulatory context includes federal, State and local governmental agencies. Water issues are regulated by the Pennsylvania Fish Commission as well as by the US Corp of Engineers (for stream crossings permits). There are no required state BMP but there are recommended BMP. The Pennsylvania Department of Environmental Protection (DEP) is responsible for wetland determination and enforcement of E&S plans. The Pennsylvania Department of Transportation (PA DOT) regulates driveway permits (access from private roads and landings to state roads) which are required for accessing State Roads from private lands. The local townships regulate township roads. PA DOT issues permits, collect road bonds, and develop and post hauling weight restrictions.

Pennsylvania has no Forest Practices Act. “Best Management Practices for Pennsylvania Forests” were published by Penn State University in cooperation with the Forest Stewardship Program of the USDA Forest Service and the PA DCNR Bureau of Forestry.

In Pennsylvania, all earth disturbance activities are governed by the Department of Environmental Protection’s Chapter 102 rules and regulations which were adopted under the authority of the PA Clean Streams Law. More information can be found at <http://www.pacode.com/secure/data/025/chapter102/chap102toc.html>

Timber harvesting and road construction / maintenance may also be governed by the Department of Environmental Protection’s Chapter 105 rules and regulations adopted under the provisions of the Dam Safety and Encroachments Act and the Fish and Boat Code – Act 175. Chapter 105 regulations deal with stream crossings such as the construction and installation of culverts, fords, bridges and other impacts to water courses. The Fish and Boat Code deals with the impacts of man-made alterations of waterways and prohibits the introduction of any substance deleterious to fish life. More information can be found at: <http://www.pacode.com/secure/data/025/chapter105/chap105toc.html> or <http://www.fish.state.pa.us/>.

CPF reported no violations of local, state or national laws or regional forest practices. SCS verified that no violations have occurred through field inspections, review of monitoring records, and interviews with stakeholders.

**2.1.2 Environmental Context**

<b>Environmental safeguards:</b>
CPF has procedures in place to evaluate and monitor environmental concerns and assure that safeguards are in place in order to protect them. CPF utilizes both in house for environmental concerns and outside consultants where CPF personnel may not have the appropriate expertise.
<b>Management strategy for the identification and protection of rare, threatened and endangered (RTE) species and their habitats:</b>
CPF regularly updates tracking of these features within the GIS through contacts with the PA DCNR and the W.PA Conservancy on new information in the PA Natural Diversity Inventory. Locations of known and historical populations of Rare, Threatened, and Endangered species are mapped in the GIS both through GPS field verification and aerial photo interpretation. These sites are then included in CPF Protection Zones coverage in either the Riparian or Unique Management Area categories. Consultations are held with ecologists and/or botanists usually from the W.PA Conservancy or the US Forest Service for field identification, verification of presence and management recommendations.

**2.1.3 Socioeconomic Context**

According to the McKean Office of Economic Development, in the mostly rural McKean and surrounding counties of northwestern Pennsylvania, the dominant industries are forest products and oil & gas exploration. In McKean, Zippo Lighters/ Case Cutlery and glass manufacturing are also important to the regional economy. These four industries based on extraction and/or manufacturing are among the top 10 employers in the County. The forest products industry is the only one dependent on renewable resources. Furthermore, approximately 67% of McKean County’s is dependent on the forest products industry in some way. The 2007-2010 downturn in the demand for forest products hurt the County economically, though in subsequent years there has been some degree of economic rebound.

Unemployment in the County was at 7.2% in the County during July 2021, while the statewide rate was 6.6% (<http://www.bls.gov/eag/eag.pa.htm>).

According to the McKean Office of Economic Development, McKean County has a higher number of people dependent on social assistance than surrounding counties. When patients are released from a major mental health facility in a neighboring county, many flock to McKean's urban center, Bradford, to obtain continuing services. Demographics wise, the northwestern region has a higher older aged and senior citizens component than the rest of Pennsylvania. On top of that, there is a regional brain-drain of educated young people as the median salary is much lower than what one could make in the rest of the state. Almost every municipality in the region has a significant drug problem as it is centrally located between major urban areas in New York and Pennsylvania.

CPF has been instrumental in maintaining the village of Kane's economy as it has been able to continue operations throughout the downturn and recovery. CPF staff are active on County development councils and associations, which seek state funds to assist in local development and offer loans to companies wishing to offer services to area residents.

The closest tribe of indigenous peoples is the Seneca Nation, who largely used CPF lands as hunting grounds. CPF conducted outreach to the tribe in 2005 related to archaeological sites and an independent archaeological analysis to detect probable locations of pre-historic sites. As a result of the 2010 recertification assessment, CPF conducted further outreach with the tribe over archaeological and sites of economic, ecological, religious or cultural significance.

#### **2.1.4 Land use, Ownership, and Land Tenure**

Land use in addition to forest management includes: cell tower leases, right of ways, and oil and gas leases. According to the CPF Management Plan, "Under Pennsylvania real estate law, subsurface oil, natural gas, and mineral ownership is legally recognized as separate estates which are independent and separable from the surface estate." The Trust and Family component of the CPF include almost all of the subsurface rights for the parcels involved. Only about seven percent of the subsurface rights on Company lands are in the possession of the CPC. Because subsurface ownerships were separated from the surface ownership by the original owners, most deeds give subsurface owners the right to utilize the surface as necessary to extract the oil, natural gas, or minerals.

The forestry department tries to work with subsurface owners planning to develop their Oil, Gas, and Minerals (OGM) rights in order to minimize negative impacts of the development. Once notification of a proposed development and proof of ownership is received, the forestry staff works cooperatively toward an arrangement that will benefit both parties and cause the least amount of impact. Proper location of roads, pipelines, electric lines, etc. will minimize future conflicts with timber management. OGM owners usually bear the entire cost of roads, culverts, gates, etc. which will be available for joint use in the future.

Additionally, all of CPF lands are open to hunting through an agreement with the Pennsylvania Game Commission.

## 2.2 Forest Management Plan

<b>Management objectives:</b>
<p>CPF's management directives are to:</p> <ol style="list-style-type: none"> <li>a) Provide a sustainable yield of high quality forest products in a dependable and predictable manner.</li> <li>b) Move the forest to a balanced age class distribution over time.</li> <li>c) Identify the site productivity, and then maintain or enhance it.</li> <li>d) Recover mortality where it is practical and will not adversely impact the ecological integrity of the site.</li> <li>e) Provide economic benefits to the owners, the Company and the persons involved directly and indirectly with the ownership and operations of the Kane Hardwood Division</li> </ol> <p>The biological goals are:</p> <ol style="list-style-type: none"> <li>1. Maintain productivity of the forest in all aspects.</li> <li>2. Maintain and improve timber quality and production for maximum sustainable yield.</li> <li>3. Maintain diverse ecological systems of this forest compatible with the production of the primary commodity – timber.</li> <li>4. Protect water quality on the timberlands.</li> <li>5. Enhance wildlife habitat.</li> </ol> <p>Maintain biodiversity</p>
<b>Forest composition and rationale for species selection:</b>
<p>Landscapes across CPF represent a full range of successional stages, including even-aged early succession, sapling, and second-growth stands. The majority of CPF forest is even-aged sawtimber size stands. Important wildlife habitat components include standing and down coarse woody debris (snags and logs), conifers, rock ledges and assemblages, and vernal ponds. The following timber types occur on CPF:</p> <ul style="list-style-type: none"> <li>• Northern Oak: Predominantly Northern Red or White Oak, occasionally including minor amounts of Black, Chestnut or Pin Oak on drier sites.</li> <li>• Northern Hardwoods: Predominantly mixtures of Sugar Maple and American Beech with minor amounts of Sweet Birch, Red Maple, White Ash, and Basswood.</li> <li>• Allegheny Hardwoods: Predominantly Black Cherry, White Ash and Tulip Poplar comprise the majority of stocking with varying amounts of Sugar Maple and Red Maple present.</li> <li>• Pioneer Species: Primarily of Aspen, Birch and Hawthorne in nearly pure or mixed stands.</li> <li>• Hemlock-Pine: Hemlock and White Pine making up the majority of the stocking.</li> </ul> <p>Selection of preferred species managed is based on demand, forest type, management requirements of timber forest type, regeneration opportunities/requirements, silvicultural goals and wildlife/ecological concerns.</p>
<b>General description of land management system(s):</b>
<p>According to the CPF Management Plan: "The silvicultural strategies employed on the CPF are influenced by the even age structure and species composition currently existing in our forest stands. They are designed to meet our strategic objectives and biological goals. Most of our stands originated from the clear-cutting of the original forest in the late 1800s and early 1900s. They are composed</p>

<p>primarily of even age stands of intolerant and moderately tolerant hardwoods. Many of these stands are at or approaching maturity.</p> <p>CPF strategy is to regulate our forest by regenerating the older stands, the less healthy stands and the stands threatened with the loss of seed sources. This will consist of stimulating the development of a new age class of healthy, diverse, advanced regeneration which will grow freely after harvesting the overstory.</p> <p>Harvesting generally focuses on two components of the stands. First and foremost is natural regeneration. Research has shown that natural regeneration must be present in sufficient quantities prior to the removal of the overstory seed source trees for the stand to regenerate successfully. Guidelines for advanced regeneration stocking have been developed by the USFS NEFES Forestry Sciences Lab at Warren, PA. These guidelines as well as other research are used to evaluate regeneration before any harvesting is planned.”</p>
<p><b>Harvest methods and equipment used:</b></p>
<p>Mainly ground based systems: Skidders, tractors, and mechanized equipment (fellers and forwarders).</p>
<p><b>Explanation of the management structures:</b></p>
<p>All forestry staff, with the exception of V.P of Collins Resources, are based out of the offices in Kane, Pennsylvania. The vice president of Collins Resources, reporting to the company president, oversees all activities on all forestland owned by the Collins Companies and regularly visits each forest location to monitor progress. CPF staff includes: Resource Manager, Land Manager, Harvest Manager, Log Sales &amp; Procurement Supervisor, Forest Programs Supervisor, Forest Systems Supervisor and Foresters.</p>

## 2.3 Monitoring System

<p><b>Growth and yield of all forest products harvested:</b></p>
<p>Annual inventory plot data and compartment exam information are used to update cover type and development class status. Annual post-harvest regeneration plot data is used to document stand establishment after harvesting.</p>
<p><b>Forest dynamics and changes in composition of flora and fauna:</b></p>
<p>A university researcher has been doing bird sampling on the CPF Trust 7 property; Deer pellet counts on a limited number of properties and browse surveys included in all regeneration data collected are used to monitor deer impacts; Cooperation is also ongoing with the Ruffed Grouse Society and Woodcocks Limited on habitat projects and monitoring.</p>
<p><b>Environmental impacts:</b></p>
<p>CPF uses internal personnel as well as contracting to specialist to monitor environmental impacts. Such activities included: A series of 18 water monitoring stations are maintained on the CPF. Measurements are taken in the fall by an independent consultant with 8-12 stationed re-measured each year.</p>
<p><b>Social impacts:</b></p>
<p>Social impacts are monitored via employee turnover (low&lt; 1%); local purchasing of goods and services; CPF open lands policy for forest recreation users. CPF produces an annual PowerPoint presentation that includes a summary of its socioeconomic impacts in the community.</p>
<p><b>Costs, productivity, and efficiency:</b></p>
<p>CPF has on-going monitoring for log to lumber yields and cost of operations. It maintains records on purchases, logging costs, and timber sales.</p>

### 3. Certification Evaluation Process

#### 3.1 Evaluation Schedule and Team

##### 3.1.1 Evaluation Itinerary and Activities

Date: Tuesday, 17 August 2021	
FMU/location/sites visited	Activities/ notes
8:30am	Opening Meeting: Introductions, client update, review scope of evaluation, audit plan, intro/update to FSC and SCS standards, confidentiality and public summary, conformance evaluation methods and tools, review of open CARs/OBS, emergency and security procedures for evaluation team, final site selection.
McKean and Potter units	<ol style="list-style-type: none"> <li>McKean 37: entrance; confirmation of property boundary paint, gate, and signage that permits hunting and other types of public access.</li> <li>McKean 37, block 58: 2020 herbicide treatment to control understory and midstory plants such as hay-scented fern, black birch, and American beech. Application done using a rubber-tired skidder equipped with a boom. This methods allows for timber stand improvement to be done without harvesting trees and accomplishes the objectives of controlling competing vegetation with minimal soil disturbance.</li> <li>Potter 3, Block 3: Active harvest (ash salvage with removal of hard maple for first step in shelterwood harvest and an adjacent stand with overstory removal and retention of desirable species (e.g., hard maple, black cherry, oak, etc.)) with hand-felling and cable skidder crew. Inspection of harvest machinery for leaks and repairs; no issues. Inspection of marked property boundary (blue paint). Road construction required a right-of-way from the Pennsylvania Game Commission. Timber grades consisted of pulp and saw logs. Discussion of log sorting at the landing.</li> <li>Potter 3, Block 2: Closed ash salvage harvest (overstory removal and retention of desirable species (e.g., hard maple, black cherry, oak, etc.)) harvested by same crew in 2020. Lots of course woody debris placed at landing areas to control runoff and create a bumper for storing logs near the slope. Observation of large cherry and ash logs, as well as pulp-grade beeches felled to waste due to poor pulp markets.</li> <li>McKean 37: observation of pipeline maintenance area. Existing pipeline right of way in process of widening due to permits granted to pipeline company. Some area to be reclaimed after installation complete. Discussion over planning process and impacts to forest management.</li> <li>McKean 33, block 39: Shelterwood harvest with ash removed completed in 2021 adjacent to stream of exceptional value (also classified as HCV). Inspection of culvert, which was 397 ft downslope from the highest point on the road. Per the <a href="#">PA BMP manual</a>, 12-inch culverts on a 3% slope may be spaced 400 ft apart. Inspection of riparian buffer and area around culvert. Sediment entering stream and no riprap installed below culvert.</li> </ol> <p>McKean 46: Inspection of decommissioned road. Area harvested about 25 years</p>

	ago, and road decommissioned to reduce maintenance costs over time and control access.
<b>Date: Wednesday, 18 August 2021</b>	
<b>FMU / location / sites visited</b>	<b>Activities / notes</b>
FME office	Document review and interviews with staff due to inclement weather.
<b>Date: Thursday, 19 August 2021</b>	
<b>FMU/location/ sites visited</b>	<b>Activities/ notes</b>
McKean units	<ol style="list-style-type: none"> <li>1. McKean 44: inspection of Buck Run stream crossing. Road maintenance is shared with a subsurface rights holders. The audit team observed broad-based dips to remove water from the road and disperse it over vegetation, and properly graded approaches to the stream crossing. There was no observation of sedimentation of the stream and the culvert was functioning without any blockages.</li> <li>2. McKean 44: inspection of 1985 tornado damage, and regeneration and growth response of salvage operation. Several retained trees were still merchantable despite damage and regeneration response lead to a well-stocked stand. This area was recently considered as part of the updated growth projection exercise to determine when and how to manage similar stands in the next 15-25 years.</li> <li>3. McKean 43, block 26: Shelterwood preparation step harvest site (completed August 2020). Site was overstocked in the understory with stagnate small-diameter birch species. The site was harvested using a feller-buncher and grapple skidder, and whole-tree yarded to a landing where trees were debarked and chipped. Debris from debarking and chipping was transported back into the harvest unit to meet BMPs and maintain nutrients onsite. Some breakage of extracted trees was also observed, which maintains small- to medium-sized woody biomass onsite. Several large, unmerchantable sections of logs (i.e., due to decay or defect) were left throughout the harvest unit, which serve as wildlife and mushroom habitat. In addition to birch, beech was also targeted. Retention trees consisted mainly of snags and overstory black cherry and hard maple, with minor components of Eastern hemlock, midstory yellow birch, and large beeches that demonstrate resistance to beech bark disease. Site will be evaluated after two growing seasons to see if sufficient desirable regeneration has been achieved. If not, intermediate treatments may be applied to secure regeneration.</li> <li>4. McKean 43: HCV 4 area (municipal water management rights for Highland Township). Water storage area guarded with fencing and buffered to control sediment. During the last harvest near the site (2012), the water authority was informed prior to harvest to provide feedback.</li> </ol> <p>McKean 43, block 26: Inspection of log landing and chipping area placed on a gravel borrow pit on adjacent property. FME secured permission to put the landing on the site, which avoided the need to install a large landing on the FMU. This resulted in conserving productive forest area and limited the impacts to a site that was already non-productive.</p>



Stakeholder interviews	Interviews with stakeholders via phone.
Location TBD 12:00pm to 2:00pm	Closing Meeting Preparation: Auditor(s) take time to consolidate notes and confirm evaluation findings
Location TBD, 2:00 pm	Closing Meeting: Brief summary of audit activities, present preliminary findings, confidentiality, SCS/FSC dispute policy, timeline for report, and discuss next steps.

### 3.1.2 Total Time Spent on Evaluation

A. Number of days spent on-site for evaluation:	3.0
B. Number of auditors participating in on-site evaluation:	2
C. Number of days spent by any technical experts (in addition to amount in line A):	N/A
D. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	3.0
<b>E. Total number of person days used in evaluation:</b>	<b>9.0</b>

### 3.1.3 Evaluation Team

<b>Auditor name:</b>	Evan Poirson	<b>Auditor role:</b>	Lead Auditor
<b>Qualifications:</b>	Evan is the Senior Program Associate for the Forest Management program at SCS and has worked in the program since 2015. He has been a Lead FSC Forest Management auditor since 2018, and a Lead FSC COC auditor since 2020. He has conducted Forest Management, COC, and Salvaged Wood audits in Argentina, Costa Rica, Dominican Republic, Ghana, Honduras, Mexico, Panama, Paraguay, Spain, South Korea, and in several regions of the United States. In addition to auditing, his duties include managing the administrative and quality-related aspects of forest management operations at SCS headquarters in California. He holds degrees in Biology (conservation emphasis) from Occidental College (B.A., 2009) and Environmental Management from Duke University (M.E.M., 2014). In 2010-12, he served as an environmental volunteer of the United States Peace Corps in the Dominican Republic.		
<b>Auditor name:</b>	Kyle Meister	<b>Auditor role:</b>	Team Auditor
<b>Qualifications:</b>	Kyle Meister is an FSC Forest Management (FM) and Chain of Custody (COC), Sustainable Biomass Partnership, and Roundtable on Sustainable Palm Oil Supply Chain Certification Lead Auditor with SCS Global Services. He has conducted FSC FM pre-assessments, evaluations or surveillance audits in Bolivia, Brazil, Canada, Costa Rica, Dominican Republic, Indonesia, India, Japan, Mexico, New Zealand, Spain, and all major forest producing regions of the United States. He has conducted COC assessments in Bolivia, Canada, Panama, and the United States (California, Georgia, Kentucky, North Carolina, Oregon, Pennsylvania, South Carolina, Tennessee, Virginia, and West Virginia). Mr. Meister has successfully completed CAR Lead Verifier, ISO 9001:2008 Lead Auditor, SA8000 Social Systems Introduction and Basic Auditor, RSPO Supply Chain Lead Auditor, SBP Lead Auditor, and FSC Lead Auditor and Trainer Training Courses. He holds a B.S. in Natural Resource Ecology and Management and a B.A. in Spanish from		

	the University of Michigan; and a Master of Forestry from the Yale School of Forestry and Environmental Studies.
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## 3.2 Evaluation of Management System

### 3.2.1 Methodology and Strategies Employed

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 reviewing documents and records, interviewing FME personnel and contractors, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observing implementation of management plans and policies in the field, and collecting and analyzing stakeholder input. When there is more than one team member, each member may review parts of the standards based on her or his 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, interviews, stakeholder comments, and reviewed documents and records. Where consensus among 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.

### 3.2.2 Pre-evaluation

- A pre-evaluation of the FME *was not* required by FSC norms.
- A pre-evaluation of the FME was conducted as required by and in accordance with FSC norms.

## 3.3 Stakeholder Consultation Process

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).

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. A public notice was sent to stakeholders at least 6 weeks prior to the audit notifying them of the audit and soliciting comments.

### 3.3.1 Stakeholder Groups Consulted

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. Stakeholder groups who are consulted as part of the evaluation include FME management and staff, consulting foresters, contractors, lease holders, adjacent property owners, local and regionally-based social interest and civic organizations, purchasers of logs harvested on FME forestlands, recreational user groups, tribal members and/or representatives, members of the FSC National Initiative, members of the regional FSC working group, FSC International, local and regionally-based environmental organizations and conservationists, and forest industry groups and organizations, as well as local, state, and federal regulatory agency personnel and other relevant groups.

### 3.3.2 Summary of Stakeholder Comments and Evaluation Team Responses

The table below summarizes the major comments received from stakeholders and the evaluation 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.

Stakeholder Comment	SCS Response
<p>Spill kit is kept in pick-up truck. For sawyers, hardhat, ear and eye protection, chaps, steel-toed boots, and gloves. Skidder operators must have hardhat, chaps, gloves, and steel-toed boots.</p> <p>Some of the workers have religious exemptions from OSHA and we maintain forms for each person.</p> <p>Worked on Collins for over 30 years. I have only worked for Collins (both on their own lands and standing timber that they buy). They are good to work for and are very honest. Their focus on sustainability is good. There are a lot of other managers in the area that don’t do as good of a job.</p> <p>For logger training this year, we took a class on invasive species recently, with emphasis on Spotted Lantern Fly.</p>	<p>Due to inclement weather, the audit team was unable to verify the use of PPE since no logging crews were working. However, logging machinery and chainsaws inspected were in a good state of repair, with no evidence of persistent leaks.</p> <p>OSHA allows exemptions for religious reasons for certain PPE (e.g., <a href="#">OSHA Directive STD 01-06-005</a>). This can be common among Anabaptist (e.g., Amish) and Sikh sects.</p> <p>Other stakeholders interviewed shared similar sentiments about working with CPF. The audit team observed good silvicultural practices and even visited some sites that had been harvested 20-30 years ago, which demonstrates that management is achieving regeneration objectives and that long-lived trees retained during the previous harvest entries are surviving as future timber value or as wildlife trees.</p> <p>The audit team confirmed via interviews with various CPF staff that it supports continuing logger education and that it has hosted logger training events on the FMU. CPF staff interviewed are also aware of Spotted Lantern Fly. Participation of CPF in logger training, civic engagement, and sustainability efforts was also</p>

	<p>confirmed by web search (e.g., <a href="#">Logger and Miller Safety Meeting</a> (announcement) and <a href="#">here</a> (post-event reporting), June 2021; and <a href="#">PA Wilds article on CPF</a>, September, 2020).</p>
<p>I've been working with Collins as part of another contractor crew since 1998, and have been self-employed since 2002. I've worked on Collins for much of this time. I do road maintenance, construction, and some harvesting. I'm a small business and keep few employees- mostly family.</p> <p>The biggest thing for people is that they enjoy this work- that is the way to attract them to this type of work. Get people outside to fish, hunt, and hike. I have been advocating for the tech school to add a forestry module.</p> <p>They are one of the best companies to work for in the area. They care more about the forest than a lot of the other outfits in the area. They exercise good stewardship. This is why I work on their lands for most of my work.</p> <p>I'm aware of invasive species. It's hard to always keep it at the forefront of your mind, but you always notice it when you see it. I let them know about the location of invasive species when I see it, such as knotweed.</p> <p>For PPE, we have gloves, steel-toed boots, hardhats, eye protection. We keep First Aid and spill kits in vehicles. We strive to have workers avoid dangerous situations. We want our people to come to work and go home safely.</p>	<p>Interviews with CPF staff confirm that they share many similar concerns about how to attract young people to the forest product industry, especially since CPF has had to temporarily suspend its summer internship program due to COVID19. Many current forestry staff are former interns and CPF has relied on this program as a recruiting tool in the past. Per interviews with staff and observation, there are a few new younger recent hires.</p> <p>Refer to response to previous stakeholder comment on positive impacts of CPF.</p> <p>The availability of invasive species training as part of logger education was confirmed in the other stakeholder comment and news articles. The audit team also observed areas of invasive species control in field site visits, confirming that CPF is responsive to new observation of invasive species such as knotweed (<i>Polygonum cuspidatum</i>).</p> <p>Due to inclement weather, the audit team was unable to verify the use of PPE since no maintenance crews were working. However, CPF's support of contractor education and training and inclusion of safety clauses in its contracts demonstrate that this is likely low risk.</p>

## 4. Results of Evaluation

### 4.1 Notable Strengths and Weaknesses of the FME Relative to the FSC P&C

Table below contains the evaluation team's findings as to the strengths and weaknesses of the subject forest management operation relative to the FSC Principles of forest stewardship. Weaknesses are noted as Corrective Action Requests (CARs) related to each principle.

Principle / Subject Area	Identified Strengths Relative to Conformity to the Standard	Identified Weaknesses Relative to Conformity to the Standard
<b>P1: FSC Commitment and Legal Compliance</b>	Collins has been involved with FSC certification longer than any other	-

	large landowner in North America and has an excellent track record of compliance with laws in PA and commitment to the FSC standards.	
<b>P2: Tenure &amp; Use Rights &amp; Responsibilities</b>	Staff capacity to work with other rights holders on the FMU while ensuring protection of sensitive resources remains strong.	-
<b>P3: Indigenous Peoples' Rights</b>	-	-
<b>P4: Community Relations &amp; Workers' Rights</b>	Individual staff remain engaged in several local conservation and economic development initiatives.	-
<b>P5: Benefits from the Forest</b>	Despite the elimination of some production lines at the FME's associated sawmill, the mill upgrades have allowed forestry staff to take saw-grade timber down to a 7" tip. This increases options for utilization in the field, especially when pulp markets are down.	-
<b>P6: Environmental Impact</b>	<p>CPF is cognizant of and incorporates landscape-level considerations across the ownership. CPF also makes effort to maintain connectivity through Wildlife Habitats and Ecological Reserves (WHER). Natural regeneration is the near exclusive method for regenerating CPF forests.</p> <p>Collaborating with PA Game Commission's DMAP program has allowed CPF to minimize deer browse damage which has increased diversity of plant species in the forest.</p> <p>CPF maintains GIS records of known populations of some invasive species. It has a program for invasive species that involves both manual and chemical control on CPF sites as well as cooperative efforts with adjacent landowners.</p>	-
<b>P7: Management Plan</b>	-	-

<b>P8: Monitoring &amp; Assessment</b>	-	-
<b>P9: High Conservation Value Forests</b>	-	-
<b>P10: Plantations</b>	N/A	N/A
<b>Chain of Custody</b>	-	-
<b>Group Management</b>	N/A	N/A

## 4.2 Process of Determining Conformance

### 4.2.1 Structure of Standard and Degrees of Nonconformance

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

Corrective action requests (CARs) are issued for every instance of a nonconformance. Major nonconformances trigger Major CARs and minor nonconformances trigger Minor CARs.

### 4.2.2 Interpretations of Major CARs, Minor CARs and Observations

*Major CARs:* Major nonconformances, either alone or in combination with nonconformances of all other applicable indicators, result (or are likely to result) in a fundamental failure to achieve the objectives of the relevant FSC Criterion given the uniqueness and fragility of each forest resource. These are corrective actions that must be resolved or closed out before a certificate can be awarded. If Major CARs arise after an operation is certified, the timeframe for correcting these nonconformances is typically shorter than for Minor CARs. Certification is contingent on the certified FME’s response to the CAR within the stipulated time frame.

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

*Observations:* These are subject areas where the evaluation team concludes that there is conformance, but either future nonconformance may result due to inaction or the FME could achieve exemplary status

through further refinement. Action on observations is voluntary and does not affect the maintenance of the certificate. However, observations can become CARs if performance with respect to the indicator(s) triggering the observation falls into nonconformance.

### 4.3. Existing Corrective Action Requests and Observations

<b>Finding Number: 2020.1</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
<b>FSC Indicator:</b>	FSC-US 8.2.c
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): After receiving information from FSC US regarding the potential locations for HCV type mesophytic cove site (MCS), without carrying out a site visit CPF concluded that the small area of overlap on their FMU did not likely contain this type because of past disturbance.	
<b>Observation:</b> CPF should ground truth the FSC maps showing MCS potential.	
<b>SCS review</b>	On Aug 11, CPF forester walked a transect and confirmed that the site does not qualify as an MCS. SCS auditor reviewed time/GPS stamped photo evidence to confirm.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

### 4.4. New Corrective Action Requests and Observations

<b>Finding Number: 2021.1</b>	
<b>Finding and Deadline</b>	
<input type="checkbox"/> Major CAR: Pre-condition to certification/recertification <input type="checkbox"/> Major CAR: 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Minor CAR: 12 months or next regularly scheduled audit, whichever comes first (surveillance or re-evaluation) <input type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other and deadline (specify):	
<b>FMU CAR/OBS issued to</b> (when more than one FMU): N/A	
<b>Standard and Indicator</b>	FSC-US Forest Management Standard, 1.1.a
<input checked="" type="checkbox"/> <b>Non-Conformity Evidence</b> <input type="checkbox"/> <b>Observation Justification and/or Explanation</b> During review of chemical use in the Collins warehouse, the audit team observed that glyphosate (Roundup) was stored in another chemical's container and was missing an appropriate label. The label on	

<p>the front of the container read “Non-Ionic Surfactant,” while on the back of the container “Roundup” was written in sharpie. This is a violation of OSHA’s hazardous chemical labeling requirements (part of its Hazard Communication Standard, 29 CFR 1910.1200), which can be found at <a href="https://www.osha.gov/sites/default/files/publications/OSHA3636.pdf">https://www.osha.gov/sites/default/files/publications/OSHA3636.pdf</a>.</p> <p>Given that this chemical is used infrequently and only by members of the immediate Collins staff (most chemical application is contracted to third parties), and that no other chemicals or hazardous substances kept on site displayed similar violations, this was issued as a Minor CAR.</p>	
<p><input checked="" type="checkbox"/> <b>Non-Conformity Corrective Action Request</b>    <input type="checkbox"/> <b>Observation; no Corrective Action is required</b></p> <p>Forest management plans and operations shall demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and administrative requirements (e.g., regulations), including OSHA chemical labeling requirements.</p>	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

<b>Finding Number: 2021.2</b>	
<b>Finding and Deadline</b>	
<input type="checkbox"/> <b>Major CAR:</b> Pre-condition to certification/recertification <input type="checkbox"/> <b>Major CAR:</b> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> <b>Minor CAR:</b> 12 months or next regularly scheduled audit, whichever comes first ( <i>surveillance or re-evaluation</i> ) <input type="checkbox"/> <b>Observation</b> – response is optional <input type="checkbox"/> <b>Other</b> and deadline (specify):	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Standard and Indicator</b>	FSC-US, 6.5.b
<input type="checkbox"/> <b>Non-Conformity Evidence</b> <input type="checkbox"/> <b>Observation Justification and/or Explanation</b> <p>Forest operations did not meet or exceed Best Management Practices (BMPs) that address components of Criterion 6.5 where the operation takes place. The PA BMP manual provides several options for preventing and mitigating the impacts of erosion, including culverts, broad-based dips, silt fences, and other measures.</p> <p>Specifically, in McKean 33, Block 49, the audit team observed a culvert that was draining 397 ft of forest road (measured with GPS application). While this adheres to cross-ditch spacing recommendations in the PA BMP manual (p. 16) for roads at 3% grade, the culvert did not have stone riprap or similar material at the outlet to dissipate the impact of falling water as recommended in the BMP manual. This was leading to sediment entering the stream. The road also had a steep hill above it that increases the risk of sediment on this site. Another culvert with a slightly larger diameter was installed less than 20 feet away from this culvert with stone riprap, as recommended in the PA BMP manual.</p>	



<input checked="" type="checkbox"/> <b>Non-Conformity Corrective Action Request</b> <input type="checkbox"/> <b>Observation; no Corrective Action is required</b> Forest operations shall meet or exceed BMPs that address components of Criterion 6.5 where the operation takes place.	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

<b>Finding Number: 2021.3</b>	
<b>Finding and Deadline</b>	
<input type="checkbox"/> <b>Major CAR:</b> Pre-condition to certification/recertification <input type="checkbox"/> <b>Major CAR:</b> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> <b>Minor CAR:</b> 12 months or next regularly scheduled audit, whichever comes first ( <i>surveillance or re-evaluation</i> ) <input type="checkbox"/> <b>Observation</b> – response is optional <input type="checkbox"/> <b>Other</b> and deadline (specify):	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Standard and Indicator</b>	SCS COC indicators for FMEs, 2.3
<input checked="" type="checkbox"/> <b>Non-Conformity Evidence</b> <input type="checkbox"/> <b>Observation Justification and/or Explanation</b> The 2018 FMP <i>F-2018 Addendum - Statement on Forest Gates</i> includes incorrect information on the FME’s certificate code and its affiliated mill’s certificate code (SCS-COC-00007N to SCS-FM/COC-000023 rather than SCS-FM/COC-00007N to SCS-COC-000023. The FSC claim (FSC 100%) is also missing. This primarily affects in the case of transfer of ownership at the stump to the mill. While the FME has not used its other two possible forest gates, lump-sum/per unit agreement and log landing, there is not enough information included in this addendum to inform the reader how the FME intends to communicate its FSC code and claim to these buyers. Per interviews with staff, the FME has a stamp it applies to documentation for sales from the log landing.	
<input checked="" type="checkbox"/> <b>Non-Conformity Corrective Action Request</b> <input type="checkbox"/> <b>Observation; no Corrective Action is required</b> The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information: f) the FME’s FSC Forest Management (FM/COC); and g) clear indication of the FSC claim, “FSC 100%” for products from FSC 100% product groups	
<b>FME response</b> <i>(including any evidence submitted)</i>	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

## 4.5 Major Nonconformances

X	No Major CARs were issued to the FME during the evaluation. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
	Major CARs were issued to the FME during the evaluation, which have all been closed to the satisfaction of the audit team and meet the requirements of the standards. Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a certificate.
	Major CARs were issued to the FME during the evaluation and the FME has not yet satisfactorily closed all Major CARs.

## 5. Certification Decision

Certification Recommendation	
<b>FME be awarded FSC certification as a “Well-Managed Forest” subject to the minor corrective action requests stated in Section 4.2.</b>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<p>The SCS evaluation team makes the above recommendation for certification based on the full and proper execution of the SCS Forest Conservation Program evaluation protocols. A positive certification decision indicates that:</p> <ul style="list-style-type: none"> <li>▪ Any Minor CARs from previous surveillance audits have been reviewed and closed prior to the issuance of a new certificate;</li> <li>▪ No Major CARs were issued to the FME during the evaluation;</li> <li>▪ Any Major CARs issued during the audit were closed prior to report finalization;</li> <li>▪ The FME has demonstrated that its system of management is capable of ensuring that all of the requirements of the applicable standards (see Section 1.6 of this report) are met over the forest area covered by the scope of the evaluation;</li> <li>▪ The FME has demonstrated that the described system of management is being implemented consistently over the forest area covered by the scope of the certificate.</li> </ul>	
<b>Comments:</b> N/A	

## SECTION B – APPENDICES (CONFIDENTIAL)

### Appendix 1 – Current and Projected Annual Harvest

The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood):	11,529 MBF (2021-2024)
Explanation of the assumptions, methodology, and reference to the data source upon which AAH and NTFP harvest rates estimates are based:	
<p>The determination of Annual Allowable Harvest (AAH) levels by species and forest modeling is fully described in the “2008 CPF Strategic Planning Report” and the “2010 Addendum to the 2008 Strategic Plan”. These two documents followed the analysis and recommendations of the “2007 State of the Forest” document which covered the years 1994-2006. These three documents should be considered part of this 2011 CPF Management Plan and can be found as Appendices. In addition, Excel worksheets which include final strategic plan modeling and all alternative scenarios tested during the strategic planning process are maintained in digital form.</p> <p>In developing the AAH the following methodology was utilized:                  Woodstock optimization model was used (2008). After additional sensitivity analyses were done, it was determined that inventory data and strata estimates would be revised but existing yield tables in the model would be used. Creating new yield tables for the CPF would not produce statistically significant changes to the model outputs.                  The Woodstock model addresses growth rates, mortality and decay factors to give net growth rates. CPF reserve areas were deleted from AAH land base before running the values in Woodstock model.                  The model also factors in type of silvicultural practices and effects on growth/responses of the forest to those methods.</p>	

### Appendix 2 – List of FMUs Selected for Evaluation

- FME consists of a single FMU

### Appendix 3 – Additional Evaluation Techniques Employed

- None.
- Additional techniques employed (*describe*):

### Appendix 4 - Staff and Stakeholders Consulted

#### List of FME Staff Consulted

To protect privacy, **only FME staff who have expressly provided written permission are listed**. These records are retained by SCS and subject to FSC or ASI examination.

Name	Title	Contact Information	Consultation method
Tom Kase	Resource Manager	<a href="mailto:tkase@collinsco.com">tkase@collinsco.com</a>	Face-to-face
Matt Gayley	Land Manager	<a href="mailto:mgayley@collinsco.com">mgayley@collinsco.com</a>	Face-to-face

Dan Hicks	GIS Forester	<a href="mailto:dhicks@collinsco.com">dhicks@collinsco.com</a>	Face-to-face
Kate Shaffer	Forestry Technician	<a href="mailto:katieshaffer@collinsco.com">katieshaffer@collinsco.com</a>	Face-to-face
Jeromy Johnson	Procurement Supervisor	<a href="mailto:jjohnson@collinsco.com">jjohnson@collinsco.com</a>	Face-to-face
Dan Witherell	Procurement Forester	<a href="mailto:dwithere@collinsco.com">dwithere@collinsco.com</a>	Face-to-face
Jamie Snyder	Harvest Manager	<a href="mailto:jsnyder@collinsco.com">jsnyder@collinsco.com</a>	Face-to-face
Dan Imbrogno	Forester	<a href="mailto:dimbrogno@collinsco.com">dimbrogno@collinsco.com</a>	Face-to-face
Nicole Bressler	Controller	<a href="mailto:nbressler@collinsco.com">nbressler@collinsco.com</a>	Face-to-face
Jason Stanley	Operations Manager	<a href="mailto:jstanley@collinsco.com">jstanley@collinsco.com</a>	Face-to-face
Galen Smith	Strategic Planning Director	<a href="mailto:gsmith@collinsco.com">gsmith@collinsco.com</a>	Face-to-face

**List of other Stakeholders Consulted\***

To protect privacy, **only stakeholders who have expressly provided written permission are listed.** These records are retained by SCS and subject to FSC or ASI examination.

Name	Title	Contact Information	Consultation method	Requests Stakeholder Notification? (Y/N)
ML	Timber Harvesting contractor representative	(814) 558-6268	Telephone	N
CM	Road construction and harvesting contractor representative	(814) 558-0201	Telephone	N

*\* Note: SCS may maintain additional records of stakeholder consultation activities (e.g., email notifications) in its recordkeeping system. Anonymous stakeholders may have provided comments as a part of stakeholder outreach activities.*

**Appendix 5 – Required Tracking**

**Pesticide Derogations**

There are no active pesticide derogations for this FME.

**Progressive HCVF Assessments**

FME does not use partial or progressive HCVF assessments.

**Special Instructions or Scoping Notes for Next Regularly Scheduled Annual Audit**

☒	Not applicable; no significant issues identified that may impact the next audit.
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**Appendix 6 – Forest Management Standard Conformance Table**

*C= Conformance with Criterion or Indicator*

*C/NC= Overall Conformance with Criterion, but there are Indicator nonconformances*

*NC= Nonconformance with Criterion or Indicator*

*NA= Not Applicable*

REQUIREMENT	C/NC	COMMENT/CAR
<p><b>Principle #1: Compliance with Laws and FSC Principles</b>                      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.</p>		
<p><b>1.1 Forest management shall respect all national and local laws and administrative requirements.</b></p>	C	
<p><b>1.1.a Forest</b> management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and <b>administrative requirements</b> (e.g., regulations). Violations, outstanding complaints or investigations are provided to the <b>Certifying Body</b> (CB) during the annual audit.</p>	NC	<p>CPF reported no violations of local, state or national laws, regional forest practices or labor, health or safety regulations. SCS verified during the 2021 recertification audit that no violations have occurred through field inspections, review of monitoring records, and interviews with stakeholders.</p> <p>One lawsuit was settled in 2019. This was a disputed deed relating to documents from the 1930s. Collins purchased the property (approx. 100 acres) in 1960 and has managed and paid property taxes on the property since that time. An individual claimed ownership based on old, disputed deeds. Collins settled rather than fight it in the court system.</p> <p><b>However, see Minor CAR 2021.1.</b></p>
<p><b>1.1.b</b> To facilitate legal compliance, the <b>forest owner or manager</b> ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.</p>	C	<p>Logging, herbicide, and other contractors must follow OSHA regulations. Contracts for road construction contractor “C.M. Excavating” (signed 5/12/20) and harvesting contractor “L.” were reviewed during the audit.</p> <p>CPF’s management system includes environmental and safety plans. Additionally, CPF sponsors annual logger training onsite, and loggers participate in SFI training.</p> <p>Employees are hired with knowledge of legal requirements and receive regular training on the subject.</p>

		<p>For example, there are harvest and land managers, each of which has knowledge and responsibility for implementing management plans according to applicable laws and regulations.</p> <p>Pennsylvania has no Forest Practices Act. “Best Management Practices for Pennsylvania Forests” were published by Penn State University in cooperation with the Forest Stewardship Program of the USDA Forest Service and the PA DCNR Bureau of Forestry. A copy of this publication can be found at:  <a href="https://extension.psu.edu/best-management-practices-for-pennsylvania-forests">https://extension.psu.edu/best-management-practices-for-pennsylvania-forests</a></p>
<p><b>1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.</b></p>	<p>C</p>	
<p><b>1.2.a</b> The forest owner or manager provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.</p>	<p>C</p>	<p>CPF’s accountant demonstrated records to verify that all taxes were paid in full for 2020-21, which is maintained in a general ledger and tracked in a spreadsheet. Property tax schedule showed that it was paid in advance in order to receive the discounted rate; the spreadsheet with date of payment corresponded to the records available in the general ledger. Auditors also reviewed receipts of county, school, town, and other taxes with the accountant.</p> <p>The Microsoft Dynamics system is used to track payments to suppliers and vendors. CPF uses a payment schedule to plan when funds are released for payment on the due date so that it can ensure that rates are correct.</p>
<p><b>1.3. 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></p>	<p>C</p>	
<p><b>1.3.a.</b> Forest management plans and operations comply with relevant provisions of all applicable binding international agreements.</p>	<p>C</p>	<p>Refer to section 2.1.1 of Section A of this report; CPF reported that CITES and ratified ILO Conventions are most relevant to its forestry operations. Management plans are written and implemented to comply with Federal and State laws ratified to meet the intent of these international agreements.</p>
<p><b>1.4. 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 the involved or affected parties.</b></p>	<p>C</p>	
<p><b>1.4.a.</b> Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles,</p>	<p>C</p>	<p>During interviews, CPF staff reported no known conflicts between FSC and legal requirements.</p>

Criteria or Indicators are documented and referred to the CB.		
<b>1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</b>	C	
<b>1.5.a.</b> The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the <i>Forest Management Unit</i> (FMU).	C	CPF participates in the Pennsylvania Game Commission’s (PGC) Forest Game Cooperator Program, which ensures that state law enforcement agencies conduct regular patrols of the FMU to assist in the prevention and detection of unauthorized activities. CPF maintains a gated road system and conducts regular boundary maintenance and surveying, as confirmed during field visits.
<b>1.5.b.</b> If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.	C	The most common issue observed by staff are unauthorized ATV trails and occasional illegal dumping, which CPF reports to PGC to implement enforcement actions. CPF has been in contact with PGC recently over these sites, per interviews with staff. CPF has installed berms and other impediments on these trails to discourage their use and has posted their recreation policy, as observed in the field and cleans up the dumping to discourage additional refuse. In the Forest Game Cooperators Program, there are multiple Game Wardens for the different Districts covering CPF’s land.
<b>1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</b>	C	
<b>1.6.a.</b> The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.	C	Viewed on the Collins Company’s website ( <a href="http://www.collinsco.com/certified-forests">http://www.collinsco.com/certified-forests</a> ). See also public summary of FMP, p. 4. CPF has been certified to the FSC Principles & Criteria since 1994, thus demonstrating its long-term commitment.
<b>1.6.b.</b> If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.	NA	Collins certifies its entire forest landholdings, including CPF and FMUs in Oregon and California.
<b>1.6.c.</b> The forest owner or manager notifies the Certifying Body of significant changes in ownership and/or significant changes in management planning within 90 days of such change.	C	No significant changes in ownership and/or significant changes in management planning have occurred within the past two years at CPF.
<b>Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</b>		

<p><b>2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.</b></p>	<p>C</p>	
<p><b>2.1.a</b> The forest owner or manager provides clear evidence of <i>long-term</i> rights to use and manage the FMU for the purposes described in the management plan.</p>	<p>C</p>	<p>CPF has copies of its deeds onsite, maintains an indexing system of right-of-way in file drawers, and a copy of a trust agreement for distinguishing the ownership of land under the Collins Family, Company, and Trust lands, as confirmed in the office. The trust agreement serves as a legal mechanism to establish the rights to manage the FMU and ensure that the forest management system is the same regardless of the ownership. Auditors verified CPF had base maps and keep a file on each tract on history of purchase, deeds, OGM ownership and any rights of way. This information is also available on GIS and multiple examples were queried and viewed by the auditor, including for all sites visited on the first day of the audit.</p>
<p><b>2.1.b</b> The forest owner or manager identifies and documents legally established use and access rights associated with the FMU that are held by other parties.</p>	<p>C</p>	<p>CPF can provide land tenure documents to surveyors and adjacent landowners as necessary (confirmed in interviews with staff). CPF documents where there is reserved and outstanding mineral rights ownership on their titles (OGM by Deed Exceptions &amp; Reservations, OGM by Lease agreement). Deeded water rights are described in the FMP (HCVF section; p.p. 19-32). Rights-of-way/ easements (gas, electric, and other various easements) are also included in the GIS database, which links to PDF files of the ownership documents. CPF provided a demonstration of its GIS system to the auditor for OGM leases and other easements.</p> <p>Recorded rights-of-way were reviewed for National Fuel Gas Supply Corp. on McKean 37.</p> <p>All CPF lands are enrolled in the PA Game Commission (PGC) Forest Game Cooperator program. This program keeps the land open to the public for hunting at no charge. Under the program the PGC provides law enforcement patrols, wildlife habitat assistance and signage.</p> <p>CPF maintains an “open land” policy for recreational access per a documented recreational policy statement maintained onsite. This policy statement is provided to anyone inquiring about recreational and hunting access, as confirmed via CPF communication records and stakeholder interviews. The policy statement is posted at major access and recreation sites, as confirmed via field observation. The policy is shared with PGC personnel</p>



		<p>who regularly patrol the FMU. Postings and gates were viewed at multiple locations, as well as open gates for access.</p> <p>CPF maintains a letter and policy on snowmobile connector trails. The document includes contact information for the snowmobile clubs that have adopted the connector trails. Also included is a copy of the agreement which must be signed by snowmobile clubs. There are a limited number of connector trails and agreements. The trails are mapped in the GIS system and the agreements are annually reviewed and renewed.</p> <p>CPF has not leased any land so no documents on leases, duration, renewal rights or disputes are included. *A parcel purchased in 2014 (Forest 20/900 ac.) had a long term established hunting lease on the property, which was not renewed this year. CPF intends to enroll this property in PGC.</p>
<p><b>2.1.c</b> Boundaries of land ownership and use rights are clearly identified on the ground and on maps prior to commencing management activities in the vicinity of the boundaries.</p>	<p>C</p>	<p>CPF has a robust GIS database of its ownership and has GPS'd the corners of many parcels. Maps were provided for each site visited and included Rights-of-way for OGM and utilities, and property boundaries. CPF demonstrated surveying and boundary maintenance records. On the ground, the audit team observed blue-painted property boundaries, survey markers, gates, and entrance signage.</p>
<p><b>2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.</b></p>	<p>C</p>	
<p><b>2.2.a</b> The forest owner or manager allows the exercise of <i>tenure</i> and <i>use rights</i> allowable by law or regulation.</p>	<p>C</p>	<p>Many of CPF's lands are subject to mineral rights held by third parties. FME complies with state law to allow mineral development by these owners. There were also pipeline and utility rights-of-way observed during the audit. See also 2.1.b. As confirmed through field observation and interviews with staff, CPF allows recreational hunting, snowmobiling, and other activities consistent with its recreational policy.</p>
<p><b>2.2.b</b> In FMUs where tenure or use rights held by others exist, the forest owner or manager consults with groups that hold such rights so that management activities do not significantly impact the uses or benefits of such rights.</p>	<p>C</p>	<p>2015CPF's policy is to work cooperatively with mineral owners to ensure that both CPF and mineral owners' activities avoid significant negative impacts to each other's use rights. Easement holders are consulted in case management activities are likely to have high impacts. Most easement and right-of-way agreements have sections on how to maintain roads, which makes this indicator low risk. Refer to FMP, section M.</p>

<p><b>2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</b></p>	C	
<p><b>2.3.a</b> If <i>disputes</i> arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.</p>	C	<p>There is one case on a property purchased in 1960s (Forest 24), but CPF been paying taxes on it since purchase. CPF is in communication with the disputant’s attorneys on this issue, which remains in litigation. CPF reported in 2014, 2015, 2016, 2017 and 2018 that it was under litigation and was resolved out-of-court in 2019. The audit team reviewed the corrective deed (12/23/2019) that demonstrates clear and uncontested ownership for this 165-acre parcel.</p>
<p><b>2.3.b</b> The forest owner or manager documents any significant disputes over tenure and use rights.</p>	C	<p>CPF strives to avoid conflicts and disputes over tenure claims through surveying when necessary and contacting adjoining property owners of pending activity. Auditor verified CPF keeps records of property disputes in the tract files. CPF demonstrated Forest 24 ownership files in the GIS database and other units deed records, including the most recent corrective deed.</p>
<p><b>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.</b></p>		
<p><b>3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.</b></p>	NA	
<p><b>3.1.a</b> Tribal forest management planning and implementation are carried out by authorized tribal representatives in accordance with tribal laws and customs and relevant federal laws.</p>	NA	<p>There are no known claims by any Indian Tribes to lands owned and managed by CPF.</p>
<p><b>3.1.b</b> The manager of a tribal forest secures, in writing, informed consent regarding forest management activities from the tribe or individual forest owner prior to commencement of those activities.</p>	NA	<p>See 3.1.a.</p>
<p><b>3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</b></p>	NA	
<p><b>3.2.a</b> During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.</p>	NA	<p>CPF has a contact list of tribal leaders and has contacted them in the past; however, per the 2011 CPF Management Plan, no tribes have legal rights or other binding agreements with CPF.</p>
<p><b>3.2.b</b> Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for,</p>	NA	<p>CPF has worked with native and non-native archeologists to protect heritage sites, as detailed extensively in the 2011 revision of the FMP (pp. 56-57). However, no tribal</p>

<p>protecting tribal resources are incorporated in the management plan.</p>		<p>resources were identified during the FMP revision, which included tribal consultations.</p>
<p><b>3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.</b></p>	<p>C</p>	
<p>3.3.a. The forest owner or manager invites consultation with tribal representatives in identifying sites of current or traditional cultural, archeological, ecological, economic or religious significance.</p>	<p>C</p>	<p>CPF conducts general consultation with tribal representatives every five years (generally prior to recertification audits). This consultation aims to on non-archeological sites such as religious or ecological sites of significance in the 2011 revision of the FMP (pp. 56-57), as well as in June 2021, per records reviewed by the audit team.</p> <p>CPF has worked with native and non-native archeologist to protect heritage sites. Through their contract archeologist CPF has verified that there are no economic, ecological or religious sites of significance within the general area or on CPF lands.</p> <p>As reviewed during the 2021 recertification audit, records and results of this consultation are maintained on CPF's server.</p>
<p><b>3.3.b</b> In consultation with tribal representatives, the forest owner or manager develops measures to protect or enhance areas of special significance (see also Criterion 9.1).</p>	<p>C</p>	<p>CPF works with a contract archeologist protects known cultural resource sites, as identified. CPF fully protects all documented sites of indigenous interest from active management, including known fire pits, artifacts, etc. A fairly significant reserve of this kind exists in the Forest County CPF holdings. CPF maintains records of this communication and also includes these areas within the GIS.</p> <p>In consultations with the Seneca Tribe in 2011, the Nation has been most concerned with finds of human remains; none has been identified to date.</p>
<p><b>3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.</b></p>	<p>NA</p>	
<p><b>3.4.a</b> The forest owner or manager identifies whether <i>traditional knowledge</i> in forest management is being used.</p>	<p>NA</p>	<p>According to interviews with CPF staff, no protected traditional knowledge is used in forest management. Any use of NTFPs is not commercial and employs management practices that are either in the public</p>

		domain (e.g., maple sugaring) or do not constitute protected traditional knowledge (e.g., deer population management). SCS confirmed through observation of management practices that CPF does not employ any protected traditional knowledge.
<b>3.4.b</b> When traditional knowledge is used, written protocols are jointly developed prior to such use and signed by local tribes or tribal members to protect and fairly compensate them for such use.	NA	See 3.4.a.
<b>3.4.c</b> The forest owner or manager respects the confidentiality of tribal traditional knowledge and assists in the protection of such knowledge.	NA	See 3.4.a.
<b>Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</b>		
<b>4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</b>	C	
<b>4.1.a</b> Employee compensation and hiring practices meet or exceed the prevailing <i>local</i> norms within the forestry industry.	C	<p>CPF employees have a health plan (incl. HSA/FSA) and contribute 10% to it, access to a pension plan or 401(k) depending on how long the employee has been with the company. CPF matches the employee 401(k) contribution up to a certain percent. Employees have access to an incentive system for new hires.</p> <p>According to HR, salaries and other benefits are determined at the corporate offices. HR confirmed that she collaborates with corporate on providing sources of regional data on salaries for local labor.</p>
<b>4.1.b</b> Forest work is offered in ways that create high quality job opportunities for employees.	C	<p>CPF employees have ample opportunities for training and continuing education, and presented a summary of different activities for 2020-21, including: SFI courses (loggers and sawmill meeting); online forestry webinars; and Roach-Bauer Forestry Forum (note: this is it occur in October 2021). Confirmed via interviews with staff.</p> <p>CPF’s policy on continuing higher education is full payment for course work or seminars and related expenses that are:</p> <ul style="list-style-type: none"> <li>• Directly related to your current job duties or responsibilities; and</li> <li>• Pre-approved by the General Manager</li> </ul>
<b>4.1.c</b> Forest workers are provided with fair wages.	C	<p>Employees had increased salaries this year. Employees interviewed stated that this is one of better places to work in terms of salary and benefits. Corporate HR gathers and analyzes data on local remuneration levels. The employee handbook (2020) also includes wage schedules and vacations for workers.</p>

<p><b>4.1.d</b> Hiring practices and conditions of employment are non-discriminatory and follow applicable federal, state and local regulations.</p>	<p>C</p>	<p>CPF has an employee handbook (2020) is in compliance with all federal and state regulations, including statutes related to non-discrimination. There is a section dedicated to equal opportunity and anti-discrimination policies. In practice, HR works with each department to ensure that candidates are evaluated based on qualifications first and foremost.</p> <p>Job announcements are placed on message boards in the office and in the mill. At the corporate level, the Collins Companies has an “Equal Employment Opportunity and Affirmative Action Program Policy” signed by the company president and CEO. The intent of the policy is to promote the contracting and hiring of women and minority workers.</p> <p>In the mill and main office, CPF has U.S. Department of Labor regulations (OSHA) and information posted so that employees are aware of their rights.</p> <p>CC’s hiring practices and conditions adhere to all applicable laws and regulations as stated in corporate-level policies: “The Collins Companies is an Equal Opportunity Employer. All qualified applicants receive consideration for employment without regard to race, color, creed, religion, gender, national origin, age, veteran status, disability, or any other status protected by law. This applies for all hiring, whether or not involved with CAF, CLF or CPF.”</p>
<p><b>4.1.e</b> The forest owner or manager provides work opportunities to qualified local applicants and seeks opportunities for purchasing local goods and services of equal price and quality.</p>	<p>C</p>	<p>Most contract and employee hires are from the local counties (see summary of socioeconomic factors 4.1.g). CPF purchases trucks from the dealership across the street from the mill when it can, and also uses a local mechanic for fixing vehicles and shops at the local hardware store, as confirmed through interviews with staff. CPF purchases tires locally since the corporate vendor’s location is too far away for reliable service. All purchases are tracked in the accounts payable system according to the controller.</p> <p>Per interviews with HR, 85-90% of employees are local to the region.</p> <p>Sample copies of CPF Timber Harvesting, Timber Hauling and Excavation Contracts was demonstrated, which shows that the vast majority of contractors are local.</p>

		<p>CPF maintains records of public events in which it has participated on bulletin boards in its office (e.g., newspaper clippings).</p>
<p><b>4.1.f</b> Commensurate with the size and scale of operation, the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management.</p>	<p>C</p>	<p>Public meetings are held in the local community, though have been significantly reduced due to COVID19. Through community outreach, tours, and civic engagement CPF contributes significantly to public education about forest ecosystems and their management. For example, CPF staff members are active on SAF, Roach-Bauer Forestry Forums, and local economic development boards (e.g., Kane Area Industrial Development Corporation, Rotary Club, Town governance). CPF also offers field tours, harvest or processing demonstrations, and research opportunities (High School / Middle School programs, AHUG Woodmobile, USDA Forest Services research), as confirmed through a review of records and stakeholder interviews.</p> <p>Refer also to trainings and continuing education under 4.1.b.</p>
<p><b>4.1.g</b> The forest owner or manager participates in local economic development and/or civic activities, based on scale of operation and where such opportunities are available.</p>	<p>C</p>	<p>CPF has a long history of working and participating with local industry and civic groups. CPF has in the past and continues to donate to such local organizations as Kane Rotary Club, Kane Chamber of Commerce, the United Way, local schools and teams, and the Art in Wilds Festival. CPF staff are permitted to use company time to participate in such civic activities. CPF staff are active in SAF, Kane Area Industrial Development Corporation, Town Council VP, and other local civic organizations,</p> <p>CPF prepared a summary of socioeconomic factors for the 2015 recertification assessment. The summary includes total wages and benefits for CPF employees, contractor figures (number of contractors and amount of payments to contractors), local vendors &amp; suppliers (242 within 80 miles of CPF mill), outside timber sales purchased locally, property taxes paid, local donations, volunteer time, and Collins Company Foundation donations. The Collins Company Foundation also makes several donations in Pennsylvania for different community organizations. CPF’s controller showed estimates of donations to be made by CPF to local community groups. For 2021, CPF has allocated \$5000 for local donations to civic groups (e.g., local schools, senior centers, and other local organizations).</p>

<p><b>4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</b></p>	<p>C</p>	
<p><b>4.2.a</b> The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).</p>	<p>C</p>	<p>All contract loggers need to complete SFI logging training which includes safety requirements. CPF has on-going safety training for contractors and employees. CPF maintains records of such training and presented a summary report of health &amp; safety training to the auditor. Employee handbooks for salaried and hourly employees contain much information on required personal protective equipment, accident reporting, alcohol and drug use, and workers' compensation.</p> <p>PA and Federal Legal postings viewed, such as OSHA, are posted in offices and mill job sites. No lost-time accidents were reported this audit cycle for CPF staff.</p>
<p><b>4.2.b</b> The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.</p>	<p>C</p>	<p>A variety of contracts were viewed. During field visit, CPF required that proper safety equipment be worn by employees and auditors. Auditor verified multiple contracts with timber harvest (last page of contract), hauling (last page), excavation (last page), and herbicide (items 8 and 11) contractors that require them to follow OSHA and other related safety requirements. All contracts viewed for a variety of contracted activities include safety requirements.</p>
<p><b>4.2.c</b> The forest owner or manager hires well-qualified service providers to safely implement the management plan.</p>	<p>C</p>	<p>Contracts viewed, companies hold state and local licenses. CPF will help pay for SFI classes for contractors and have also put on SFI classes on their land/at their location. Observed evidence of proper hand-felling techniques on stumps inspected during field visits.</p> <p>Contract loggers are required to complete SFI logger training and contracts require that they adhere to OSHA requirements. SCS verified that these requirements were included in contracts and also confirmed a sample of the companies/loggers maintain their certifications/training.</p>
<p><b>4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).</b></p>	<p>C</p>	
<p><b>4.3.a</b> Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.</p>	<p>C</p>	<p>Workers' right to organize is assured by the laws of the State of Pennsylvania and the United States of America. As a company, the Collins Companies follow U.S. National Labor regulations and neither encourage nor discourage workers' right to organize. The CPF employee handbook (2020) has a solicitation policy that forbids employees to solicit during company hours and on job</p>

		<p>sites. However, employees may solicit during lunch hour and permitted breaks. This would include any discussions between employees and a labor organization. The Company does not have a track record of anti-labor policy; in fact, the mill in Chester, CA is unionized. Per interview, workers confirmed that they are free to advocate for their interests.</p>
<p><b>4.3.b</b> The forest owner or manager has effective and culturally sensitive mechanisms to resolve disputes between workers and management.</p>	<p>C</p>	<p>CPF has a process for worker evaluation for salaried employees and conducts exit interviews with employees who wish to leave the company. CPF has an open-door policy, so any worker can bypass their manager to discuss issues with the general manager. The employee handbook (2020) includes description of disciplinary procedures and consulting with upper management on disputes.</p> <p>CPF foresters (primarily Harvest Mgr.) meet with contractors regularly on the job sites. CPF forestry staff organizes an annual contractor training for all logging contractors with various presentations on relevant environmental, safety, silviculture, certification, product specs and other issues. CPF staff overall have open communication and are able to resolve most disputes with management.</p>
<p><b>4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.</b></p>	<p>C</p>	
<p><b>4.4.a</b> The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on:</p> <ul style="list-style-type: none"> <li>• Archeological sites and sites of cultural, historical and community significance (on and off the FMU);</li> <li>• Public resources, including air, water and food (hunting, fishing, collecting);</li> <li>• Aesthetics;</li> <li>• Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health;</li> <li>• Community economic opportunities;</li> <li>• Other people who may be affected by management operations.</li> </ul> <p>A summary is available to the CB.</p>	<p>C</p>	<p>Refer to FMP, section N for a summary of CPF’s compliance to this indicator. Other sections of FMP are also relevant (Water Resources, in Section N; and HCVF, in Section G). CPF prepared a summary of socioeconomic factors for the 2021 recertification assessment (SCS information request Principle 4 and 2021 Public Monitoring Report). Other CPF public meeting records viewed. Staff sent a letter to the Seneca Nation in 2021 requesting consultation.</p>



<p><b>4.4.b</b> The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.</p>	<p>C</p>	<p>CPF staff maintains a file of comments received and actions taken. Most inquiries involve hunting and recreational access. Phone, email and personal inquiries are responded to promptly. Inquiries relating to land management issues from adjacent landowners are usually followed up with additional contacts and often a meeting to discuss the relevant issues is scheduled.</p> <p>Ongoing stakeholder processes include the comments section of the website (collinsco.com) and public meetings (note: has not held one since 2017). The resource manager's company email Outlook Folders serve as a record of some consultations and advance notice of some management activities. Confirmed via interviews that CPF has held public meetings to present information and receive questions from local stakeholders.</p> <p>Since COVID19, more and more comments are received via email or the website comment form. The resource manager handles comments. Reviewed records of website comments and email responses to respond and describe any actions taken (September-October 2020). CPF intends to use its website more to interact with stakeholders going forward since attendance at public meetings has been low even before COVID19.</p>
<p><b>4.4.c</b> People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.</p>	<p>C</p>	<p>See 4.4.b. No stakeholders contact the audit team regarding any timber harvest impacts. Utility rights-of-way and OGM development have public notification processes per federal guidelines. For example, the gas pipeline observed during the audit on McKean 37 required public notification through FERC (<u>FM100</u>).</p> <p>Organizations that have rights to resources on the FMU, such as municipal drinking water sources, are duly informed of upcoming management activities that may affect their rights. Confirmed via interviews with staff and review of the FMP. Per interviews with staff, they may contact adjacent landowners on occasion if they expect to operate near a property boundary or require access through another property to access the FMU. There were no comments from stakeholders about negative effects to their use rights and no evidence in the field of damage to accesses managed by other parties.</p>
<p><b>4.4.d</b> For <i>public forests</i>, consultation shall include the following components:</p>	<p>NA</p>	<p>CPF does not own or manage any public forests.</p>

<p>1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans;</p> <p>2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management;</p> <p>3. An accessible and affordable appeals process to planning decisions is available.</p> <p>Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.</p>		
<p><b>4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</b></p>	C	
<p><b>4.5.a</b> The forest owner or manager does not engage in negligent activities that cause damage to other people.</p>	C	<p>CPF maintains rights-of-way and allows other tenured users to exercise their rights without hindrance. The audit team uncovered no examples of CPF engaging in negligent activities on harvest sites, utility rights-of-way, or oil &amp; gas development sites tenured by other users.</p>
<p><b>4.5.b</b> The forest owner or manager provides a known and accessible means for interested stakeholders to voice grievances and have them resolved. If significant disputes arise related to resolving grievances and/or providing fair compensation, the forest owner or manager follows appropriate dispute resolution procedures. At a minimum, the forest owner or manager maintains open communications, responds to grievances in a timely manner, demonstrates ongoing good faith efforts to resolve the grievances, and maintains records of legal suites and claims.</p>	C	<p>CPF staff maintains a file of comments received and actions taken. Most inquiries involve hunting and recreational access. Phone, email and personal inquiries are responded to promptly. Inquiries relating to land management issues from adjacent landowners are usually followed up with additional contacts and often a meeting to discuss the relevant issues is scheduled. CPF is able to receive comments through the CollinsCo.com website. Common inquiries relate to hunting access.</p> <p>Records of legal claims as they relate to property rights are maintained in the land tract files.</p>
<p><b>4.5.c</b> Fair compensation or reasonable mitigation is provided to local people, communities or adjacent landowners for substantiated damage or loss of income caused by the landowner or manager.</p>	C	<p>CPF has not had any such claims over damage or loss of income by communities or adjacent landowners in over five years. CPF's policy is to identify adjacent landowners and examine any tenure or use rights during the planning phase of operations to avoid such damage. According to staff, CPF offers compensation for easements or right-of-way.</p>
<p><b>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.</b></p>		

<p><b>5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.</b></p>	<p>C</p>	
<p><b>5.1.a</b> The forest owner or manager is financially able to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management.</p>	<p>C</p>	<p>According to an interview with the controller, CPF has remained profitable and has continued investing in staff and the resource at a consistent level. The countervailing tariffs from China on hardwood exports was a sizable position of CPF sales. However, the FME was able to reorganize and by 2020 it has increased its sales to domestic customers. Auditor did not observe any signs (layoffs, change in harvesting, etc.) that would indicate short-term financial events are reducing investments necessary to maintain ecological productivity.</p> <p>For the past two years, CPF has been unable to hire college interns for summer work. This has increased the workload on forestry staff, but has not led to any significant changes in cost since they do marking while leaves are off.</p>
<p><b>5.1.b</b> Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.</p>	<p>C</p>	<p>CPF prepares an annual budget allocation for planned forest management activities. A budget for 2021 was prepared in October 2020 by the CPF Lands Manager and the former General Manager. The budget includes assumptions for payments, capital expenditures, planned timber sales, community donations, etc.</p>
<p><b>5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest’s diversity of products.</b></p>	<p>C</p>	
<p><b>5.2.a</b> Where forest products are harvested or sold, opportunities for forest product sales and services are given to local harvesters, value-added processing and manufacturing facilities, guiding services, and other operations that are able to offer services at competitive rates and levels of service.</p>	<p>C</p>	<p>CPF maintains a list of local contractors. During interviews with harvesting contractors, all confirmed that they were local. The only exception to local contractors is the occasional spray crews that are not available locally. CPF uses its own mill, but also sells product to local pulp, chip, and pallet mills. Sometimes CPF sells logs to local Amish mills and other small producers. For example, the CPF mill does not process basswood, so it sells basswood directly from log landings to other local processors. CPF’s associated mill has graders onsite that ensure that each log is used or sold for its highest and best use.</p>
<p><b>5.2.b</b> The forest owner or manager takes measures to optimize the use of harvested forest products and explores product diversification where appropriate and consistent with management objectives.</p>	<p>C</p>	<p>CPF works in cooperation with Kane Hardwood sawmill to market harvested trees based on type of product and grade. Specifications are communicated to loggers in the field so that logs are sorted by species and grade and cut at lengths optimal for use in the mill or for export. Field observation confirmed good utilization of sawlogs,</p>

		though pulp grade sections of trees and pulp grade trees were left onsite due to poor local pulp markets.
<b>5.2.c</b> On public lands where forest products are harvested and sold, some sales of forest products or contracts are scaled or structured to allow small business to bid competitively.	NA	CPF does not own or manage any public forests.
<b>5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</b>	C	
<b>5.3.a</b> Management practices are employed to minimize the loss and/or waste of harvested forest products.	C	Mill and forestry staff have discussions on log specifications and sorts with foresters and contract loggers. Observed good utilization of sawlogs overall, though pulp grade material was left within the harvest unit due to poor local pulp markets. These were not transported to the landing and left throughout the harvest site, which assist with achieving regeneration objectives and nutrient cycling.
<b>5.3.b</b> Harvest practices are managed to protect residual trees and other forest resources, including: <ul style="list-style-type: none"> <li>• soil compaction, <i>rutting</i> and erosion are minimized;</li> <li>• residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected;</li> <li>• damage to NTFPs is minimized during management activities; and</li> <li>• techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible.</li> </ul>	C	CPF logging contractors employ directional felling and use mechanized equipment to avoid damage to the residual stand and soils. See notes site notes in this report. Interview foresters and review of training records for staff.
<b>5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</b>	C	
<b>5.4.a</b> The forest owner or manager demonstrates knowledge of their operation’s effect on the local economy as it relates to existing and potential markets for a wide variety of timber and non-timber forest products and services.	C	Confirmed via interviews with CPF’s Lands Manager, CPF Controller, CPF Resource Manager, CPF Harvesting Forester, and other staff, local logging contractors and community members. CPF not only demonstrates its knowledge of its impact on the local economy, but also implements a variety of actions to diversify the economic use of the FMU. Notably, most of the forest is open for public recreation including hunting, hiking, birding, and other uses. CPF participates in the Kinzua Quality Deer Cooperative that benefits local hunters, while also helping CPF to achieve its objectives for regeneration and protection of forest resources.
<b>5.4.b</b> The forest owner or manager strives to diversify the economic use of the forest according to Indicator 5.4.a.	C	Foresters gain an understanding of the local community, in part, via civic participation. Examples of civic participation demonstrated by CPF foresters include acting member of Kane Borough Council Member, member of Kane Shade Tree Commission for the

		Borough, advisor to State Trails Commission, President of local trails group, and Conservation Board member. Refer to socioeconomic summary cited in 4.4.a and public monitoring results summary in 8.5.a.
<b>5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</b>	C	
<b>5.5.a</b> In developing and implementing activities on the FMU, the forest owner or manager identifies, defines and implements appropriate measures for maintaining and/or enhancing forest services and resources that serve public values, including municipal watersheds, fisheries, carbon storage and sequestration, recreation and tourism.	C	<p>CPF allows open access for recreational use of the FMU, thus enhancing recreation and tourism values of the lands and local economy. CPF has been working with the Western Pennsylvania Conservancy on planning some stream restoration projects to add woody debris to streams and other fisheries enhancements.</p> <p>CPF has made a sizable annual investment in a long-term macro invertebrate monitoring project (20 sites total, of which 8-10 sites per year). Research to-date has demonstrated that timber harvesting activities on CPF are not damaging stream values. The research has been paused since 2020 due to COVID19.</p> <p>On McKean 2-016, CPF has designated some forest area that is part of the Bradford, PA municipal watershed as HCVF 4 and has modified its harvest management systems to uneven-aged management to maintain continuous forest cover. Deeded water rights are also designated as HCVF 4 and protected with no-harvest or reduced harvest buffers. Spring-seeps are also buffered with no-harvest zones.</p>
<b>5.5.b</b> The forest owner or manager uses the information from Indicator 5.5.a to implement appropriate measures for maintaining and/or enhancing these services and resources.	C	CPF works with local agencies and sportsmen to manage the deer herd that allows enhancing of forest resource and improves the recreational hunting experience for sportsmen. See 5.5.a for how CPF implements measures to protect or enhance water quality related to drinking water and fisheries.
<b>5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</b>	C	
<b>5.6.a</b> In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan.  The sustained yield harvest level calculation for each planning unit is based on:	C	<p>According to CPF Management Plan, Allowable harvest is 12 MBF company lands (~ 9 MBF company land and 3 MBF from trust &amp; family lands).</p> <p>Due to ash salvage over the last 5 years, the allowable harvest has been exceeded by approximately 4%. In 2021, CPF has temporarily altered its AAH to 11,529 MBF per year for 2021-24 to ensure that it stays within its AAH.</p> <p>January 2010 CPF developed an addendum to their 2008 Strategic forest plan. This addendum re-evaluates the</p>

<ul style="list-style-type: none"> <li>• documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions;</li> <li>• mortality and decay and other factors that affect net growth;</li> <li>• areas reserved from harvest or subject to harvest restrictions to meet other management goals;</li> <li>• silvicultural practices that will be employed on the FMU;</li> <li>• management objectives and desired future conditions.</li> </ul> <p>The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.</p>		<p>annual allowable harvest (AAH) due to a major land sale in 2009. NOTE: CPF is currently in the process of updating its AAH based on more recent inventory data. By 2022, CPF expects to have an updated AAH.</p> <p>In developing the AAH the following methodology was utilized: Woodstock optimization model was used (2008). After additional sensitivity analyses were done, it was determined that inventory data and strata estimates would be revised but existing yield tables in the model would be used. Creating new yield tables for the CPF would not produce statistically significant changes to the model outputs. The Woodstock model addresses growth rates, mortality and decay factors to give net growth rates. CPF reserve areas were deleted from AAH land base before running the values in Woodstock model. The model also factors in type of silvicultural practices and effects on growth/responses of the forest to those methods.</p>
<p><b>5.6.b</b> Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.</p>	<p>C</p>	<p>From 2012-2021 to date, actual harvest was 123,057 MBF versus an allowable of 120,000 MBF. The harvest above allowable is due to salvage of ash and beech. The excess salvage is consistent with the following clause from the FSC-US Standard: “If the intent is to change the species balance in a stand or planning unit, or to achieve a desired age class structure, or to manage a catastrophic or natural event such as fire or pest outbreak, a particular species might be harvested at a higher-than-sustainable rate until its optimal stand occupancy could be achieved (e.g., by restocking via planting, etc.)”</p> <p>CPF is currently in the process of updating its AAH based on more recent inventory data from the past 10 years. By 2022, CPF expects to have an updated AAH. Ash salvage should be complete over the next 1-2 years, at which point harvest rates should stabilize.</p>
<p><b>5.6.c</b> Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.</p>	<p>C</p>	<p>CPF’s forest management is focused on regenerating younger age classes through use of shelterwood systems, and developing a more balanced age-class distribution. While improvement thinnings are employed on occasion, herbicides may be used as a surrogate for thinning or as a site preparation step. CPF’s Harvest Basket Access database is used to schedule regeneration surveys of recently harvested areas within a certain timeframe so that the next treatment is scheduled when regeneration</p>

		<p>is established. In this manner, CPF avoids issues with over- or under-stocking. See field notes section related to regeneration and herbicide treatments.</p>
<p><b>5.6.d</b> For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.</p>	<p>NA</p>	<p>CPF does not have any commercial harvesting of NTFPs.</p>
<p><b>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.</b></p>		
<p><b>6.1. 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></p>	<p>C</p>	
<p><b>6.1.a</b> Using the results of <i>credible scientific analysis, best available information</i> (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes:          1) Forest community types and development, size class and/or successional stages, and associated <i>natural disturbance regimes</i>;          2) <i>Rare, Threatened and Endangered (RTE) species</i> and <i>rare ecological communities</i> (including plant communities);          3) Other habitats and species of management concern;          4) Water resources and associated riparian habitats and hydrologic functions;          5) <i>Soil resources</i>; and          6) <i>Historic conditions</i> on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions.</p>	<p>C</p>	<p>CPF incorporates landscape-level considerations into forest management analysis and decisions; the GIS database greatly enhances the ability to assess harvest impacts. Resource assessment information is up-to-date as confirmed during the review and demonstration of the GIS system and management plan documentation. The analysis includes for example forest community types and size class, RTEs, water resource areas, soil data and ensures appropriate assessment of potential impacts.</p> <p>1. Historic disturbance regimes have been documented in the management plan. The management plan and inventory data include forest types and size classes. Harvest practices mimic natural disturbance regimes; examples of early-seral habitat conditions as well as undisturbed reserves and within stand retention were observed in the field and on maps.</p> <p>2. CPF uses the PA Natural Diversity Index to establish RTE habitat types. The 2011 Management Plan includes a section (G) that describes RTE species and reserve areas. Timber sales are compared to the Natural</p>

		<p>Heritage Database for potential impact to RTE species, with updates to the database being used when provided to CPF by the State.</p> <p>3. CPF implements strategies to maintain connectivity of habitat types through the use of planned uninterrupted corridors (for wildlife habitat) and reserves and monitors and tracks the establishment of invasive plant populations as observed in the field, in the GIS system and on maps.</p> <p>4. Stream Management Zone Regional Requirements (Appalachian Region) have been adopted as a minimum standard and in many cases are exceeded. The potential impacts to soil and water resources that are associated with harvest practices are identified and mitigated through the implementation of this company’s Erosion and Sedimentation Plan process.</p> <p>5. Knowledge and use of soils information has been developed as confirmed through forester interviews during this audit program and observations of timing restrictions itemized elsewhere in this report.</p> <p>6. CPF’s even-age management practices include retention of residual trees across all size classes in an attempt to mimic the effects of regional natural disturbance regimes (wind and ice storms) as observed in the field and described elsewhere in this report.</p>
<p><b>6.1.b</b> Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a.</p> <p>The assessment must incorporate the <b>best available information</b>, drawing from scientific literature and experts. The impact assessment will at minimum include identifying resources that may be impacted by management (e.g., streams, habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.</p>	<p>C</p>	<p>Foresters establish conditions including for example optimal operating seasons, equipment limitation and road restriction and develop harvest plans that ensure prescription goals and forest production objectives are met based on best available information as described above (6.1a).</p> <p>As verified in interviews with CPF personnel, written prescriptions link to the company GIS system document management activities. The PA Natural Heritage Program dataset is used to determine potential RTE presence.</p> <p>Reserve Areas database on GIS houses RTE information. Audit team reviewed Trust 17 Block 4 harvesting block, which had hits for <i>Calopteryx amata</i>. Prescription would be to leave standing trees around water; they determined this would not be a risk for this specific site.</p> <p>Forest 7 Block 22 has Swainson’s Thrush presence. Prescription for the block was shelterwood, in line with</p>



		<p>recommendations for the species, which was to leave blocks of evergreens (hemlocks and pines). This was reflected in retention prescription for the site.</p> <p>The audit team and CPF personnel reviewed perennial streamside vs. intermittent stream management on GIS, including how different GIS designations play into timber marking (e.g., at spring seeps). Buffer zones are also verified as they are laid out during marking.</p> <p>During OGM development within this FMU, the OGM owners are required to check PA Natural Diversity Inventory to avoid impacts to RTE species during their activities. The State of PA has regulatory authority and CPF is included on documents as a landowner.</p>
<p><b>6.1.c</b> Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1) avoid or minimize negative short-term and long-term impacts; and, 2) maintain and/or enhance the long-term ecological viability of the forest.</p>	<p>C</p>	<p>Harvest projects and road construction are supervised by company foresters to ensure that mitigation measures are implemented. Contractors interviewed at two sites verified that company foresters explain through maps, field walks, and on-site visits each of the requirements needed to implement the field prescriptions. Each harvest prescription is provided to each logging contractor and includes a description of the marking system that is used to identify residual tree retention as well as other special features.</p> <p>As confirmed through monitoring results associated with the company’s “Rapid Water Quality Assessment of Stream Condition,” no detectable long-term effects on water resources were found for streams and variables evaluated.</p> <p>For example, when CPF’s GIS system is linked to information from the PA Natural Diversity Inventory to document and map RTE species, the results of this exercise ensure that the long-term viability of this forest resource.</p>
<p><b>6.1.d</b> On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.</p>	<p>NA</p>	<p>CPF does not own or manage any public forests.</p>
<p><b>6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting</b></p>	<p>C</p>	

<p><b>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>		
<p><b>6.2.a</b> 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 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>C</p>	<p>No known cases in which management prescriptions have needed to be modified based on RTE species presence, per se. Blocks are managed under the assumption that there is species presence, per PA NDI dataset.</p> <p>CPF consults with outside agencies, e.g. the US Forest Service, regarding known species presence that may not be reflected in the PA NDI dataset. For example, two Northern Long-eared bat hibernacula were found outside the FMU, both of which have a small buffer area that crosses ownership boundaries into CPF. CPF has designated these areas on maps and has identified them in the field for no-harvest.</p> <p>CPF maintains regular dialogue with regional environmental groups (e.g., the Western PA Conservancy) and updates its GIS database every five years to take into account new information from the Pennsylvania Natural Heritage Program. Foresters also conduct informal surveys when cruising the blocks.</p>
<p><b>6.2.b</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. <b>Conservation zones</b> and/or <b>protected areas</b> 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>	<p>C</p>	<p>CPF regularly updates tracking of these features within their GIS database through contacts with the PA DCNR and the W.PA Conservancy on new information in the PA Natural Diversity Index. Locations of known and historical populations of Rare, Threatened, and Endangered species are mapped in the GIS both through GPS field verification and aerial photo interpretation. These sites are then included in CPF Protection Zones coverage in either the Riparian or Unique Management Area categories.</p> <p>CPF regularly dialogues with the Forest Service and PA Game Commission and integrates relevant data into its management plans. For example, the Forest Service reported goshawk presence at the Warren 21 site in 2012-14, and no active management in that zone is planned for the near-term.</p>

		<p>Some bat hibernacula that are located on adjacent lands have ¼-mile buffers that extend into CPF’s FMU (see also <b>6.2.a</b>). CPF staff showed that these two areas on McKean 1 have been identified and buffer zones established on the FMU, as demonstrated in GIS and observed in the field during the previous audit. Within these buffer areas, no harvest is allowed without a permit from US Fish &amp; Wildlife.</p> <p>CPF has designated Special Management Areas: These are sites with unique natural conditions, habitat types, geological formations and plant or animal communities. Timber harvesting is generally prohibited and this acreage will be excluded from Annual Allowable Harvest calculations.</p> <p>CPF has taken actions, e.g. maintenance of coarse woody debris and participation in the Deer Management Assistance Program (DMAP) program through the game commission, to keep deer numbers in check and thus improve conditions for rare plants.</p>
<p><b>6.2.c</b> 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>	<p>NA</p>	<p>CPF does not own or manage any public forests</p>
<p><b>6.2.d</b> 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>	<p>C</p>	<p>As viewed during the 2021 recertification audit, CPF has a policy of allowing hunting, fishing, trapping and collecting on their lands, but limits access through use of gates to control areas that may not be appropriate for such activities, e.g. in sensitive habitats.</p> <p>Collecting of ginseng, fishing and hunting is regulated by State agencies.</p> <p>See also discussion under Criterion 1.5.</p>
<p><b>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.</b></p>	<p>C</p>	
<p><b>6.3.a.1</b> The forest owner or manager maintains, enhances, and/or restores under-represented <i>successional</i> stages in the FMU that would 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>C</p>	<p>Natural regeneration is used almost exclusively for regenerating species suited to each site. CPF uses scientific research and onsite silvicultural experiences to make management decisions. Oak regeneration follows the SILVAH method. Limited use of uneven-aged management is practiced in watersheds managed for drinking water (for example, at the McKean tract).</p>

		<p>CPF has protected areas in which harvest is not allowed, thus allowing them to revert to later successional stands (see also Criterion 6.4).</p> <p>See Section 2.1 for site visit notes. Observed even-aged treatments, riparian reserves, e.g., wildlife corridors along streams and dividing larger even-aged blocks.</p>
<p><b>6.3.a.2</b> 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, <i>conservation zones</i> and/or <i>protected areas</i> are established where warranted.</p>	C	<p>Locations of known and historical populations of Rare, Threatened, and Endangered species and communities are mapped in the GIS through GPS field verification, consultation with Pennsylvania Natural Diversity Inventory (PNDI), and aerial photo interpretation. These sites are then included in CPF Protection Zones coverage in either the Riparian or Unique Management Area categories, confirmed per interview and in the field and with GIS queries at the office.</p>
<p><b>6.3.a.3</b> When they are present, management maintains the area, structure, composition, and processes of all <i>Type 1</i> and <i>Type 2 old growth</i>. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, 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</p>	C	<p>PA old growth forests were clear cut over 110 years ago with few areas of native old growth remnants left in the State. CPF does not contain any old growth stands as defined by in the 2010 FSC US Management Standard or the CPF Management Plan. Inventory data from 2008 and historic photos confirm that there is likely no old growth on the FMU.</p> <p>CPF does not own or manage any public or tribal forests.</p>

<p>of their sovereignty and unique ownership. Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> <li>1. Old growth forests comprise a significant portion of the tribal ownership.</li> <li>2. A history of forest stewardship by the tribe exists.</li> <li>3. High Conservation Value Forest attributes are maintained.</li> <li>4. Old-growth structures are maintained.</li> <li>5. Conservation zones representative of old growth stands are established.</li> <li>6. Landscape level considerations are addressed.</li> <li>7. Rare species are protected.</li> </ol>		
<p><b>6.3.b</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>	<p>C</p>	<p>As verified during the 2021 recertification audit, CPF ensures that all its larger tracts (over 1000 acres) display substantial seral stage diversity, either through the use of rotational reserves or riparian corridors that are not actively managed. The region around CPF includes extensive areas of public land (incl. the Allegheny National Forest) which are managed for late successional stages. Many of the private landowners use various partial harvest practices on their forestlands. As such CPF’s Strategic Plan is focused on creating early successional habitat and fills a unique niche in the regional landscape.</p> <p>CPF has continued to cooperate with Woodcock Unlimited on habitat and monitoring of American Woodcock, signage for harvests benefits wildlife.</p> <p>CPF has continued cooperation with Trout Unlimited, Woodcock Unlimited, Ruffed Grouse Society, WPC, KQDC (Kinzua Quality Deer Cooperative), USFS and PA Fish &amp; Boat Commission on stream habitat improvements. The combination of harvesting and retention practices within management areas, and the protection of special sites such riparian zones ensures varied habitat conditions.</p>
<p><b>6.3.c</b> Management maintains, enhances and/or restores the plant and wildlife habitat of <b>Riparian Management Zones (RMZs)</b> to provide:</p> <ol style="list-style-type: none"> <li>a) habitat for aquatic species that breed in surrounding uplands;</li> <li>b) habitat for predominantly terrestrial species that breed in adjacent <b>aquatic habitats</b>;</li> <li>c) habitat for species that use riparian areas for feeding, cover, and travel;</li> <li>d) habitat for plant species associated with riparian areas; and,</li> </ol>	<p>C</p>	<p>All harvest sites visited provided (as listed in the audit itinerary) provided evidence of RMZ management per 6.3.c</p> <p>CPF’s FMP has established a permanent reserve system (no harvest zones) which includes and connects riparian areas. Certain stream types may have limited harvest (retain 50% canopy, equipment exclusion). Continuous improvement of mapping these areas by GPS data collection is part of ongoing management.</p>

<p>e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.</p>		<p>Some riparian areas are dominated by Eastern hemlock. To date, Hemlock Woolly Adelgid is not present on CPF land. CPF is protecting these areas and occasionally harvests in intermittent streams, which allows for hemlock regeneration.</p> <p>See field notes in section 2.1 for additional details.</p>
<p><b>Stand-scale Indicators</b>  <b>6.3.d</b> Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>	<p>C</p>	<p>Silvicultural prescriptions try to maintain naturally occurring species through creating conditions for regeneration and using retention of different species as seed sources. CPF retains residuals in final harvest throughout a variety of diameter classes and species to avoid the loss of any single species on the landscape, as observed in field visits.</p> <p>One of the biggest threats to tree species and understory plant species composition in PA is deer herbivory. CPF strategy for deer herbivory is participation in hunting programs (e.g., Deer Management Assistance Program, DMAP) and grouping harvests to overwhelm the deer.</p>
<p><b>6.3.e</b> 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. <b>Native species</b> suited to the site are normally selected for regeneration.</p>	<p>C</p>	<p>CPF relies heavily on natural regeneration, and reseeding and planting efforts are uncommon. Planting is mainly done for wildlife planting, for which CPF uses local seedlings of native species that they secure from the PA Game Commission and local nursery both of which use local seed sources.</p> <p>A very limited level of planting occurs, generally for species that have wildlife value. These include native white pine and white spruce. All seed sources are from the local Penn Nursery near State College, PA run by the PA DCNR Bureau of Forestry, which maintains information on provenance.</p>
<p><b>6.3.f</b> 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:  a) large live trees, live trees with decay or declining health, <b>snags</b>, and well-distributed coarse down and dead woody material. <b>Legacy trees</b> where present are not harvested; and  b) vertical and horizontal complexity.  Trees selected for <b>retention</b> are generally representative of the dominant species found on the site.</p>	<p>C</p>	<p>As verified during the 2021 recertification audit, CPF’s retention in overstory removal and shelterwood harvests is selected from all size classes and has diversity of species found on the site. In addition, snags and den trees are also retained when not conflicting with OSHA safety requirements as verified in the field.</p> <p>See field evidence in section 2.1. Interview CPF foresters regarding marking guidelines.</p> <p>Selected long term residual trees may eventually become snags. Site visits observed that residual stems, LWD, snags, and wildlife trees were present on all harvested sites.</p>

<p><b>6.3.g.1</b> In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when <b>even-aged systems</b> 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 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>C</p>	<p>CPF utilizes stream side buffers and retention of reserve trees throughout the opening which meet this standard without any need for exemptions under 6.3.g.2. See regional appendix.</p> <p>No difficulty in meeting live, standing and downed dead woody debris retention objectives under the CPF Strategic Plan and the CPF Management Plan, confirmed in field visits.</p>
<p><b>NE Region Indicator 6.3.g.1.a</b> Silvicultural systems favor natural regeneration where appropriate, and forest operations are planned to protect pre-established natural regeneration of desirable species.</p>	<p>C</p>	<p>All harvest sites visited during 2021 audit relied entirely on natural regeneration and were laid out and timed in a manner that protect natural regeneration. See notes in Section 2.1.</p>
<p><b>6.3.g.2</b> 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"> <li>1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture).</li> <li>2. Is based on the totality of the <b>best available information</b> including peer-reviewed science regarding natural disturbance regimes for the FMU.</li> <li>3. Is spatially and temporally explicit and includes maps of proposed openings or areas.</li> <li>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.</li> <li>5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.</li> </ol>	<p>C</p>	<p>CPF does not depart from the 10-acre opening size for either uneven-age or even-age management; see comments on retention in 6.3.g.1.</p>
<p><b>6.3.h</b> The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control <b>invasive species</b>, including:</p> <ol style="list-style-type: none"> <li>1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems;</li> <li>2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread;</li> </ol>	<p>C</p>	<p>Review of invasive species GPS layer and control work. CPF is monitoring and mapping invasive species and entering it into their GIS layer. Polygons are maintained in GIS that show areas of invasive concern, plus treatment (pesticide and date of treatment and reinspection).</p> <p>CPF has programs for invasive species that involve both manual and chemical control on CPF sites as well as</p>

<p>3. eradication or control of established invasive populations when feasible: and,                  4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.</p>		<p>cooperative efforts with adjacent landowners. CPF’s invasive species strategy is covered in the FMP (p.p. 44-46). contract language for CM Excavating includes a clause specific to cleaning machinery that has been active near known populations of invasive spp. Such as Glossy Buckthorn, Knotweed, Garlic Mustard, Purple Loosestrife, Japanese Stiltgrass, and Autumn Olive.</p> <p>Records of several invasives treatments were tracked in the office and through GIS records per stand (e.g., Trust 7 tract, managed for glossy buckthorn). Invasives Plants CPF database reviewed during the audit, and it documents 6.3.h.1 to 6.3.h.4.</p>
<p><b>6.3.i</b> 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>There is low risk of wildfire, and wildfires that do occur are usually small in size and quickly contained. The Pennsylvania fire season occurs twice a year for short periods of time. Generally, April-May and September-October are the most frequent months for fires to occur. Forest fires in the State of Pennsylvania fall under the jurisdiction of the Pennsylvania Department of Conservation and Natural Resources, Bureau of Forestry (BOF); containment and suppression efforts are their responsibility. They achieve this by working with local fire departments and local fire wardens.</p> <p>There are few fire prevention efforts that can be implemented due to the short fire season and quick green up of these forests. No fire management activities or control measures were reported during the 2021 recertification audit.</p>
<p><b>6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</b></p>	<p>C</p>	
<p><b>6.4.a</b> The forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the <i>landscape</i> (see Criterion 7.1). The assessment for medium and large forests include some or all of the following: a) <b>GAP analyses</b>; b) collaboration with state natural heritage programs and other public agencies; c) regional, landscape, and watershed planning efforts; d) collaboration with universities and/or local conservation groups.</p>	<p>C</p>	<p>Refer to FMP (p.p. 19-40). CPF relies on natural heritage data and its own identification of naturally occurring ecosystems on the FMU, and collaboration with Western Pennsylvania Conservancy, US Forest Service, Pennsylvania DCONR, and other regional stakeholders with information on known RSAs. CPF is aware of what ecosystem types are represented and protected in the regional landscape, according to interviews with staff.</p>



<p>For an area that is not located on the FMU to qualify as a Representative Sample Area (RSA), it should be under permanent protection in its natural state.</p>		<p>However, CPF classifies RSAs regardless of their protected status outside of the FMU.</p> <p>According to interviews the Western PA Conservancy, plant communities are ranked. The methodology is consistent with that of NatureServe; communities are ranked on size, representation, and quality. Communities are mapped and submitted to the Conservancy with a rank based on these factors. The Bureau of Forestry has jurisdiction over RTE plant communities; when an environmental review is registered and if there is an S1 or S2 community, a ‘hit’ will be returned and a site-level review will occur. Voluntary actions are then suggested to avoid or minimize impacts.</p> <p>This documentation was reviewed by the audit team, in order to provide clarity on how the Collins staff selected RSAs on its property.</p>
<p><b>6.4.b</b> Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes.</p> <p>Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU.</p>	<p>C</p>	<p>Refer to FMP (p.p. 19-40). While CPF is adjacent to many large public landholdings and many are managed for late successional stages, CPF does not rely on the protection of RSAs outside of the FMU for determining whether or not an RSA warrants protection. CPF simply designates these areas as RSA given the values identified therein. CPF has designated RSA for purposes 1, 2, and 3.</p> <p>Rotational reserves protect late seral characteristics on the FMU. What is currently kept in rotational reserve will eventually be re-harvested and new stands will be protected to maintain these characteristics on CPF’s landscape, thus ensuring the continuity of these traits.</p> <p>Larger tracts (over 1000 acres) are guaranteed to have either a rotational reserve OR an equivalent corridor (e.g., riparian area) that serves the same conservation interests. The management goal is to provide connectivity across the entirety of CPF’s holdings.</p>
<p><b>6.4.c</b> Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances:</p>	<p>C</p>	<p>Refer to FMP (p.p. 32-38). Harvesting is allowed in RSAs once conditions necessary to fulfill this RSA type allow it to be moved spatially and temporally to another location</p>

<p>a) harvesting activities only where they are necessary to restore or create conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or                  b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated.</p>		<p>in the landscape. Other compatible measures are documented in the FMP.</p> <p>First implemented this on the Trust 7 property, Dr. Brooks has a long-term bird study and the stream monitoring is also completed through the same office.</p>
<p><b>6.4.d</b> The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.</p>	C	<p>The RSA analysis was last conducted in 2011; no changes have been identified as necessary at this time.</p>
<p><b>6.4.e</b> Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.</p>	NA	<p>CPF does not own or manage any public forests.</p>
<p><b>6.5 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></p>	C	
<p><b>6.5.a</b> The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.</p>	C	<p><i>Best Management Practices for Pennsylvania Forests and Pennsylvania's Timber Harvest Operations Field Guide for Waterways, Wetland and Erosion Control</i> serve as CPF's documented BMP guidelines. Refer to FMP (pp. 17-19).</p>
<p><b>6.5.b</b> Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.</p>	NC	<p>Forest operations did not meet or exceed Best Management Practices (BMPs) that address components of Criterion 6.5 where the operation takes place. The PA BMP manual provides several options for preventing and mitigating the impacts of erosion, including culverts, broad-based dips, silt fences, and other measures.</p> <p>Specifically, in McKean 33, Block 49, the audit team observed a culvert that was draining 397 ft of forest road (measured with GPS application). While this adheres to cross-ditch spacing recommendations in the PA BMP manual (p. 16) for roads at 3% grade, the culvert did not have stone riprap or similar material at the outlet to dissipate the impact of falling water as recommended in the BMP manual. This was leading to sediment entering the stream. The road also had a steep hill above it that increases the risk of sediment on this site. Another culvert with a slightly larger diameter was installed less than 20 feet away from this culvert with stone riprap, as recommended in the PA BMP manual.</p> <p><b>See Minor CAR 2021.2.</b></p>

<p><b>6.5.c</b> Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed:</p> <ul style="list-style-type: none"> <li>• Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard.</li> <li>• Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site.</li> <li>• Rutting and compaction is minimized.</li> <li>• Soil erosion is not accelerated.</li> <li>• Burning is only done when consistent with natural disturbance regimes.</li> <li>• Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives.</li> <li>• Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed.</li> <li>• Low impact equipment and technologies is used where appropriate.</li> </ul>	<p>C</p>	<p>Harvest operations are under the direct supervision of the Harvest Manager. Harvest planning is supported by a monthly ‘Long Range Logging Planning Meeting’ that includes the Harvest Manager, Resource Manager, Land Manager, Procurement Supervisor, Log Quality Specialist and Log Yard/Sales Supervisor.</p> <p>Erosion &amp; Sedimentation Plans are prepared for each harvest (Harvest Mgr.) or road construction project (Land Mgr.). Plans are reviewed with contractors and must be kept on site with contractor at all times. Plans must be maintained until all clean up, close out work and stabilization is completed.</p> <p>As confirmed through field site observation and interviews with CPF staff:</p> <ul style="list-style-type: none"> <li>• Slash is retained with a goal of even distribution across the harvest project, but also may be used as corduroy;</li> <li>• Topsoil disturbance is limited to skid trails;</li> <li>• Rutting is minimized;</li> <li>• Management practices do not accelerate soil erosion;</li> <li>• Scarification is not used and most disturbances to vegetation are limited to skid trails;</li> <li>• Whole tree chipping is not practiced over multiple rotations;</li> <li>• Skidders, fellers, and forwarders are the most common equipment used, some of which is tracked (which has lower impact).</li> </ul>
<p><b>6.5.d</b> The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes:</p> <ul style="list-style-type: none"> <li>• access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts;</li> <li>• road density is minimized;</li> <li>• erosion is minimized;</li> <li>• sediment discharge to streams is minimized;</li> <li>• there is free upstream and downstream passage for aquatic organisms;</li> </ul>	<p>C</p>	<p>Refer to FMP (pp. 61-63). CPF’s road maintenance program is designed to meet guidelines established in 6.5.a, which address the bullet points of this indicator. In addition, CPF also implements some measures to reduce road density in OGM development projects and ensure that road quality standards are met. CPF has been using larger culverts to reduce sedimentation. CPF uses travel lanes (areas of higher retention or no harvest) for establishing wildlife corridors between harvest sites that may cross roads, this was observed on one site and the prescription for the travel lanes was viewed in several other harvest plans.</p> <p>As confirmed in field sites, operations met transportation system requirements overall. Several additional BMP applications were reviewed.</p>

<ul style="list-style-type: none"> <li>• impacts of transportation systems on wildlife habitat and migration corridors are minimized;</li> <li>• area converted to roads, landings and skid trails is minimized;</li> <li>• habitat fragmentation is minimized;</li> <li>• unneeded roads are closed and rehabilitated.</li> </ul>		
<p><b>6.5.e.1</b> In consultation with appropriate expertise, the forest owner or manager implements written <b>Streamside Management Zone (SMZ) buffer</b> management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers.</p> <p>In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.</p>	C	<p>Harvest operations are under the direct supervision of the Harvest Manager.</p> <p>CPF utilizes the Appalachia Regional Standard contained in Appendix E as a Minimum Standard. Often CPF Permanent Reserves, Riparian Areas and travel lanes exceed the standard, as observed in the field.</p>
<p><b>6.5.e.2</b> Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.</p>	NA	<p>Harvest planning is supported by a monthly ‘Long Range Logging Planning Meeting’ that includes the Harvest Manager, Resource Manager, Land Manager, Procurement Supervisor, Log Quality Specialist and Log Yard/Sales Supervisor.</p> <p>No documentation of variations has been needed to date per interviews with CPF staff and observation of SMZs in the field.</p>
<p><b>6.5.f</b> Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of <b>aquatic habitat</b>. Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.</p>	C	<p>Erosion &amp; Sedimentation Plans are prepared for each harvest (Harvest Mgr.) or road construction project (Land Mgr.). Plans are reviewed with contractors and must be kept on site with contractor at all times. Plans must be maintained until all clean up, close out work and stabilization is completed.</p>

		<p>County Conservation Districts are also routinely involved in reviewing adherence to BMPs. Road design is laid out along with the contractor to ensure BMPs are used. The 2019 Water Quality Report for Macroinvertebrate Study, including supporting document from academic community, was also reviewed by the audit team.</p> <p>Permitted stream crossings were viewed, both approved and completed in consultation with the PA DEP Northwest Office and the Warren County Conservation District. Crossings were skillfully constructed by local contractors and CPF.</p>
<p><b>6.5.g</b> Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.</p>	<p>C</p>	<p>Overall, CPF works with PGC to patrol the FMU and control recreation. Many entrances to the FMU are gated. CPF maintains regular contact with sportsmen’s groups to stay current on hunting issues.</p>
<p><b>6.5.h</b> Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.</p>	<p>NA</p>	<p>CPF does not allow grazing and none was observed.</p>
<p><b>6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</b></p>	<p>C</p>	
<p><b>6.6.a</b> No products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents).</p>	<p>C</p>	<p>CPF makes use of three chemical pesticides (see Section 1.1 in Section A of the public summary), one of which (glyphosate) appears on FSC-POL-30-001a under the Restricted category.</p> <p>CPF does not make use of any Prohibited or Highly Restricted chemicals, per FSC-POL-30-001a.</p>
<p><b>6.6.b</b> All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than</p>	<p>C</p>	<p>CPF documents its chemical use strategy in the FMP (pp. 50-52). CPF primarily uses chemicals when other means of control are not effective or result in less environmental damage than non-chemical alternatives. For achieving regeneration objectives, CPF conducts evaluations of regeneration quality two years after completing regeneration harvests (multiple samples reviewed). If regeneration is undesirable, then chemical</p>

<p>non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical.</p> <p>Written strategies are developed and implemented that justify the use of chemical pesticides. Whenever feasible, an eventual phase-out of chemical use is included in the strategy. The written strategy shall include an analysis of options for, and the effects of, various chemical and non-chemical pest control strategies, with the goal of reducing or eliminating chemical use.</p>		<p>control may be applied in an attempt to eliminate it and establish desirable regeneration via seed or supplemental planting. Other reasons for using chemicals include effective means of controlling invasive species. GIS records of chemical use also reviewed at the stand level.</p>
<p><b>6.6.c</b> Chemicals and application methods are selected to minimize risk to non-target species and sites. When considering the choice between aerial and ground application, the forest owner or manager evaluates the comparative risk to non-target species and sites, the comparative risk of worker exposure, and the overall amount and type of chemicals required.</p>	<p>C</p>	<p>For invasive species, hack ‘n’ squirt or direct spray are the preferred methods due to their reduced risk of impacting non-target species. Chemical treatments to control regeneration or act as a surrogate for thinning use tracked or tired machinery to target understory and midstory plants. Areas to be protected are delineated on maps in and in GIS. The current herbicide contractor uses a GPS-guided device to ensure that non-target areas are not treated, even when they are within treatment unit. The audit team reviewed the Warren 33 herbicide prescription, which barred the use of Oust due to presence of HCV 4 (spring) value. Areas off-limits for chemical treatments include HCVs, property boundaries, and riparian areas.</p> <p>During the 2021 recertification audit, the audit team viewed stands that had received previous application on current harvest sites.</p>
<p><b>6.6.d</b> Whenever chemicals are used, a written prescription is prepared that describes the site-specific hazards and environmental risks, and the precautions that workers will employ to avoid or minimize those hazards and risks, and includes a map of the treatment area.</p> <p>Chemicals are applied only by workers who have received proper training in application methods and safety. They are made aware of the risks, wear proper safety equipment, and are trained to minimize environmental impacts on non-target species and sites.</p>	<p>C</p>	<p>Per FMP (pp. 50-52), GIS maps, contractor records, chemical application contract, and PA applicator license serve as the prescription. Certain maps may contain descriptions of site-specific risks when they are present.</p> <p>As reviewed by the audit team, maps for herbicide blocks are created for contractors. Reviewed Herbicide prescription for McKean 37 Block 58 (37 acres). Target: Fern, Beech, Striped Maple. Chemical dosage per acre: 3 oz Oust / 2 qt Accord. Prescription is within label rate.</p> <p>As for FME staff, chemicals are applied only by CPF employees who have received proper training in application methods and safety. Reviewed Dan Hicks’ Certified Private Pesticide Applicator Permit (exp. 3/31/2023). Required credits are maintained via Forest</p>

		Health, Insect, and Disease Briefing (held annually, usually at PSU).
<b>6.6.e</b> If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals.	C	<p>Monitoring of chemical use occurs prior to and after treatment. Regeneration plots are used to decide whether or not to treat, the type of chemical, and how much to use.</p> <p>Treated sites are monitored for regeneration after three years. All records are documented in GIS and an Access Database. Worker exposure to chemicals has not been recorded but would be reported per state regulations.</p> <p>Regeneration plot form reviewed for Forest 16 Block 22, 23 July 2021 (shelterwood requiring herbicide due to beech and fern interference.)</p>
<b>6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.</b>	C	
<b>6.7.a</b> The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills.	C	<p>Three CPF foresters have a PA applicator license (showed to auditors), which requires annual continuing education. <b>See also 6.6.d.</b></p> <p>CPF keeps a spill kit onsite and PPE for cleaning up spills. Applicator license holders must supervise in-house applications and contractor work. Contracted LTOs are required to carry spill kits; contractual language reviewed by the audit team.</p>
<b>6.7.b</b> In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations.	C	<p>No cases of spills recorded in past audit period. Per logging contracts, contractors are required to carry spill kits. Verified with FME staff that FME personnel would seek appropriate guidance depending on chemical and hazard risk.</p>
<b>6.7.c.</b> Hazardous materials and fuels are stored in leak-proof containers in designated storage areas, that are outside of riparian management zones and away from other ecological sensitive features, until they are used or transported to an approved off-site location for disposal. There is no evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination.	C	<p>SCS auditors observed fuel storage, paint thinner, and herbicides stored in CPF’s warehouse. These were kept in leak-proof containers and in designated storage areas, far from riparian areas and ecologically sensitive features.</p> <p>All herbicides are stored in a steel locker. One chemical (glyphosate) was stored in a container that was mislabeled as Chemsurf 90 Non-Ionic Surfactant; see related finding at 1.1.a.</p> <p>A fire extinguisher and first aid kit are kept in the warehouse.</p>

<p><b>6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.</b></p>	<p>C</p>	
<p><b>6.8.a</b> Use of <i>biological control agents</i> are used only as part of a pest management strategy for the control of invasive plants, <i>pathogens</i>, insects, or other animals when other pest control methods are ineffective, or are expected to be ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for native species.</p>	<p>NA</p>	<p>No biological control agents used on CPF. Refer to FMP (p. 52).</p>
<p><b>6.8.b</b> If biological control agents are used, they are applied by trained workers using proper equipment.</p>	<p>NA</p>	<p>No biological control agents used on CPF. Refer to FMP (p. 52).</p>
<p><b>6.8.c</b> If biological control agents are used, their use shall be documented, monitored and strictly controlled in accordance with state and national laws and internationally accepted scientific protocols. A written plan will be developed and implemented justifying such use, describing the risks, specifying the precautions workers will employ to avoid or minimize such risks, and describing how potential impacts will be monitored.</p>	<p>NA</p>	<p>No biological control agents used on CPF. Refer to FMP (p. 52).</p>
<p><b>6.8.d</b> Genetically Modified Organisms (GMOs) are not used for any purpose</p>	<p>C</p>	<p>Per interviews with CPF, no GMOs are used.</p>
<p><b>6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</b></p>	<p>C</p>	
<p><b>6.9.a</b> The use of <i>exotic species</i> 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>C</p>	<p>No exotic species are used for any purposes at CPF. CPF had considered using Norway spruce in the past as part of its Hemlock Woolly Adelgid strategy (see 6.3.e) per US Forest Service Guidelines. Though an exotic species, Norway spruce has been planted in PA for several decades and does not exhibit invasive qualities. It had been considered as a potential hemlock replacement due to future HWA infestation; however, this was decided against.</p> <p>CPF only uses native seed mixes. OGM developers are required to use the PA DEP seed mix, which was formulated to be non-invasive.</p>
<p><b>6.9.b</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>No exotic species are used at CPF.</p>
<p><b>6.9.c</b> 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>No exotic species are used at CPF.</p>



<p><b>6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:</b>  <b>a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</b></p>	<p>C</p>	
<p><b>6.10.a</b> Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	<p>C</p>	<p>There is no forest conversion to non-forest land use on the CPF except where OGM activities occur; these rights supersede Collins’ surface rights but have accounted for much less than the FSC definition of a “very limited portion” of CPF’s forested land, at approximately 0.025% per year. Limited road construction also occurs. See also FMP pp. 52-56, 61-63.</p> <p>Because the majority of subsurface mineral ownership belongs to other parties, CPF works extensively with the subsurface owners to minimize the impact to their surface ownership.</p> <p>CPF includes a number of cellphone towers within its area converted for rights-of-way (ROW) on locations that were previously non-forest (e.g. stone pits, access roads, landings). For ROWs that are &lt; 1 acre, GIS data is collected as point coverage with no area and is tracked and mapped. For ROWs &gt; 1 acre, GIS data is collected as a polygon with area and tracked in the GIS system.</p>
<p><b>6.10.b</b> Forest <i>conversion</i> to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	<p>C</p>	<p>OGM developments complete assessments of sites to avoid RTE species and wetlands, which are the main potential HCVs on CPF. As confirmed through staff interviews and review of GIS, SCS confirmed that conversion did not affect HCVs.</p>
<p><b>6.10.c</b> Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	<p>C</p>	<p>CPF cannot preclude OGM development per State law. The greatest potential impact of OGM development is road and well-pad(s) construction but CPF works with OGM developer to minimize the impacts from this activity. CPF works with OGM to develop road systems that benefit both parties. New OGM and cell tower access roads developed recently have the potential to improve CPF access to its lands for management activities.</p>
<p><b>6.10.d</b> Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.</p>	<p>C</p>	<p>CPF has not converted any lands to plantations.</p>
<p><b>6.10.e</b> Justification for land-use and stand-type conversions is fully described in the long-term</p>	<p>C</p>	<p>CPF has no intention of implementing stand-type conversions except in the case of existing plantations</p>

<p>management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.1)</p>		<p>where the company policy is to convert these monocultures to natural vegetation forest types at maturity.</p> <p>Land-use conversion is covered in 6.10.a-c and meets biodiversity requirements primarily in the identification and protection of sensitive sites prior to conversion (OGM and communications tower installations).</p>
<p><b>6.10.f</b> Areas converted to <i>non-forest use</i> for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are identified on maps. The forest owner or manager consults with the CB to determine if removal of these areas from the scope of the certificate is warranted. To the extent allowed by these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to non-forest use would be subject to Indicator 6.10.a-d.</p>	<p>C</p>	<p>As confirmed through GIS demonstration, each mineral owners’ infrastructure and rights are mapped. CPF works with mineral owners to minimize impacts, including for example the location of infrastructure changes including new access roads.</p> <p>FSC-US defines limited conversion as “less than 2% of the certified forest area on the FMU over a rolling five-year period. Lands that are converted for forest management purposes (e.g. roads, landings, management buildings) are not included in calculations of this limit.” CPF considers roads and infrastructure related to OGM installations as conversion. Even with its more conservative definition that includes roads in addition to OGM development, CPF supplied figures for conversion amounting to approximately 0.025% of the FMU per year, which is verifiable using its GIS data. Areas converted due to OGM exploration are factored into CPF’s annual allowable harvest rate (AAH), which is based on volume at the stand level. Considering that CPF also works with subsurface owners to minimize area converted and to avoid sensitive features, is not experiencing a high rate of conversion, serves on a state-level committee to address OGM issues, and is attempting to reclaim some closed or abandoned wells, these areas can remain within the scope. In other words, removal of these areas from the scope of this certificate is not warranted since most area is still under forest management.</p> <p>Most well-pad areas are less than 10 acres in size and some are in the 12-20-acre size range. On these larger sites, there is potential for about half of this area to be reclaimed in the future following the removal of retention ponds.</p>
<p><b>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.</b></p>		
<p><b>7.1. The management plan and supporting documents shall provide:</b></p>	<p>C</p>	

<p><b>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.</b></p> <p><b>b. 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.</b></p> <p><b>b) h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.</b></p> <p><b>i) Description and justification of harvesting techniques and equipment to be used.</b></p>		
<p><b>7.1.a</b> 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>Confirmed through document review (FMP page 5-6).</p> <p>CPF’s overarching FMP was updated in 2011 to consider the requirements of Criterion 7.1. Other importing supporting documents include CPF’s GIS and 2008 Strategic Plan, 2010 Strategic Plan Addendum, and manuals and other publications produced by third parties. Justification for cellphone towers is described in the management plan Addendum (October 2016) including a description of how C6.3 biodiversity requirements are met.</p>
<p><b>7.1.b</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>Confirmed through document review (FMP page 6-15).</p>
<p><b>7.1.c</b> The management plan describes:  a) current conditions of the timber and non-timber forest resources being managed; b) desired future conditions; c) historical ecological conditions; and d) applicable management objectives and activities to move the FMU toward desired future conditions.</p>	C	<p>Confirmed through document review (FMP page 5-15 and “State of the Forest Report – Collins Pennsylvania Forest, Chapter 2, 2009-2018.”)</p>
<p><b>7.1.d</b> 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>	C	<p>Confirmed through document review (FMP page 8, 12-13, 19-43, and 63-68).</p>
<p><b>7.1.e</b> The management plan includes a description of the following resources and outlines activities to conserve and/or protect:</p>	C	<p>Confirmed through document review (FMP page 19-43 and 57-60) for each bullet point of this indicator. Each of these resources are also detailed in the GIS system and</p>

<ul style="list-style-type: none"> <li>• rare, threatened, or endangered species and natural communities (see Criterion 6.2);</li> <li>• plant species and community diversity and wildlife habitats (see Criterion 6.3);</li> <li>• water resources (see Criterion 6.5);</li> <li>• soil resources (see Criterion 6.3);</li> <li>• Representative Sample Areas (see Criterion 6.4);</li> <li>• High Conservation Value Forests (see Principle 9);</li> <li>• Other special management areas.</li> </ul>		<p>associated attribute tables as confirmed through a GIS demonstration and field maps generated for this field audit and described elsewhere in this report.</p>
<p><b>7.1.f</b> 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>	C	<p>Confirmed through document review (FMP page 44-46). The presence of NNIS is also detailed in the GIS system and associated attribute tables as confirmed through a GIS demonstration and field maps generated for this field audit and described elsewhere in this report.</p>
<p><b>7.1.g</b> 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 6.8).</p>	C	<p>Confirmed through document review (FMP page 46-50) and “State of the Forest Report – Collins Pennsylvania Forest, Chapter 2, 2009-2018.”</p>
<p><b>7.1.h</b> If chemicals are used, the plan describes what is being used, applications, and how the management system conforms with Criterion 6.6.</p>	C	<p>Confirmed through document review (FMP page 50-52). Chemical use is also detailed in the GIS system and associated attribute tables as confirmed through a GIS demonstration and field maps generated for this field audit and described elsewhere in this report.</p>
<p><b>7.1.i</b> If biological controls are used, the management plan describes what is being used, applications, and how the management system conforms with Criterion 6.8.</p>	NA	<p>Biological control agents are not used on the CPF. Confirmed through interviews and document review (FMP page 48).</p>
<p><b>7.1.j</b> The management plan incorporates the results of the evaluation of social impacts, including:</p> <ul style="list-style-type: none"> <li>• traditional cultural resources and rights of use (see Criterion 2.1);</li> <li>• potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2);</li> <li>• management of ceremonial, archeological, and historic sites (see Criteria 3.3 and 4.5);</li> <li>• management of aesthetic values (see Indicator 4.4.a);</li> <li>• public access to and use of the forest, and other recreation issues;</li> <li>• 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).</li> </ul>	C	<p>Confirmed through document review (FMP page 56-61) for each bullet point. FMP, section N includes a summary of CPF’s compliance to indicator 4.4.a (p.p. 56-60). Other sections of FMP are also relevant (Water Resources, page 42-43; and HCVF, page 30-32). CPF prepared a summary of socioeconomic factors for this assessment.</p>
<p><b>7.1.k</b> The management plan describes the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).</p>	C	<p>Confirmed through document review (FMP page 61-63).</p>

<p><b>7.1.l</b> 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.</p>	<p>C</p>	<p>Confirmed through document review (FMP page 8-18). The Strategic Plan includes a specific description of how forest management systems will achieve the long-term objectives established therein.</p>
<p><b>7.1.m</b> The management plan describes how species selection and harvest rate calculations were developed to meet the requirements of Criterion 5.6.</p>	<p>C</p>	<p>The 2008 CPF Strategic Planning Report and 2010 Addendum to the 2008 CPF Strategic Plan include detailed analyses on inventory data used to establish the sustained yield harvest rate.</p> <p>This is also summarized in the 2011 CPF Management Plan (page 8-16, 63-67). Stand exam procedures are also necessary to compare planned versus actual harvests on the FMU.</p>
<p><b>7.1.n</b> The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.</p>	<p>C</p>	<p>See Criterion 8.2. While the monitoring procedures are generally addressed in the FMP page 66-67, they are also addressed more specifically throughout the FMP. For example, page 13 includes a general description on the use of inventory to monitor growth and page 59-60 provides one on monitoring of socioeconomic issues.</p>
<p><b>7.1.o</b> 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.</p>	<p>C</p>	<p>Confirmed through document review (FMP page 16-17).</p> <p>More importantly, as confirmed through GIS demonstration, CPF's GIS system is part of the FMP and allows for a greater variety and types of maps to be produced for management purposes.</p>
<p><b>7.1.p</b> 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.</p>	<p>C</p>	<p>Confirmed through document review (FMP page 17-19).</p>
<p><b>7.1.q</b> 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.</p>	<p>C</p>	<p>CPF prepared a gap analysis that details all of the documents involved in meeting this requirement, which was reviewed by the audit team.</p>
<p><b>7.1.r</b> The management plan describes the stakeholder consultation process.</p>	<p>C</p>	<p>The process, comments received and incorporation of consultation results into the Management Plan is included in the final version of the 2011 FMP. The consultation process for tribes, HCVF classification, inquiries from hunters and other recreationalists is also described.</p> <p>Ongoing process-website (<a href="http://www.collinsco.com">www.collinsco.com</a>)          -Public Meetings          -Land Mgr. Outlook Personal Folders (DMAP Responses /others topic specific).</p>

<p><b>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.</b></p>	<p>C</p>	
<p><b>7.2.a</b> 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.</p>	<p>C</p>	<p>The current FMP was completed in 2011. The management of the CPF is guided by this FMP for the next decade (2012-2021). Addendums are used as a method to keep the plan up-to-date including for example a justification for cellphone towers that is described in the management plan Addendum (October 2016) including a description of how C6.3 biodiversity requirements are met.</p>
<p><b>7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plans.</b></p>	<p>C</p>	
<p><b>7.3.a</b> 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.</p>	<p>C</p>	<p>As confirmed through interviews and field observations, CPF ensures that it hires qualified workers through an application process. CPF provided training records for forestry employees. Confirmed through interviews and document review that staff meetings are held regularly to review harvest and other site-level plans. Senior staff are involved in the supervision and training of junior staff.</p>
<p><b>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.</b></p>	<p>C</p>	
<p><b>7.4.a</b> 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.</p>	<p>C</p>	<p>CPF includes the public summary on its webpage and meets the content for C7.1 (<a href="http://www.collinsco.com/pennsylvania-overview/">http://www.collinsco.com/pennsylvania-overview/</a>). A map of the general area is included on the DMAP website (<a href="http://www.collinsco.com/DMAP/">http://www.collinsco.com/DMAP/</a>).</p>
<p><b>7.4.b</b> Managers of public forests make draft management plans, revisions and supporting documentation easily accessible for public review and comment prior to their implementation. Managers address public comments and modify the plans to ensure compliance with this Standard.</p>	<p>NA</p>	<p>CPF does not own or manage public forests.</p>
<p><b>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.</b></p>		
<p><b>8.1 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</b></p>	<p>C</p>	

<p><b>replicable over time to allow comparison of results and assessment of change.</b></p>		
<p><b>8.1.a</b> Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol.</p>	C	<p>CPF uses their GIS mapping systems, pre- and post-inventory activity, hiring of consultants for non-timber monitoring (water, wildlife &amp; archeology), as well as site inspections, to consistently implement a monitoring protocol. Written protocols are found in the management plan as well as in policy documents for specific monitoring activities. During the audit the auditor reviewed these policies and confirmed that they cover the current scale and intensity of management.</p>
<p><b>8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: 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, and e) cost, productivity, and efficiency of forest management.</b></p>	C	
<p><b>8.2.a.1</b> For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.</p>	C	<p>Rolling inventory, every dormant season (Oct 15-Apr15) measure about 500 plots covering different strata, looks at the statistics and tighten up the stats, look at the confidence interval and tighten up the estimates and inventory. 10-year rolling average, once stands are harvested, they drop out of the inventory as that condition does not exist anymore. Inventory plots are dropped 11 years and new plots added to calculate the new average condition.</p> <p>See FMP, sections C and Q. CPF has an extensive inventory system that meets all the parameters of this indicator. In addition, this data is accessible through the GIS mapping system. Annual budget and GIS reviewed during the audit and confirms a) to f) are included. Per interviews with staff, the GIS stands layer is updated annually to reflect harvest activities and other changes that may have happened on-the-ground (i.e., splitting of one stand into two for management purposes).</p>
<p><b>8.2.a.2</b> Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.</p>	C	<p>May get to the end of this level at the end of their ash salvage program, but not there yet...</p> <p>See FMP (p.p. 66-67). CPF has an extensive inventory system that meets all the parameters of this indicator. In addition, this data is accessible through the GIS mapping system. This was reviewed during the audit.</p> <p>GIS shows areas that were areas affected by windstorm events and subsequently salvaged (or not). The latest</p>

		<p>major storm event was in 2003, though there have been some smaller events in 2012, 2015, and 2017, which were assessed for salvage and harvested if possible. OGM development is GPS and entered into GIS database and acres are removed from AAH acres.</p> <p>The most recent monitoring for unanticipated removal includes salvage for beech and ash. For example, there are Salvage protocols for follow-up monitoring for ash salvage harvests</p>
<p><b>8.2.b</b> The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.</p>	<p>C</p>	<p>2021: No NTFPs are harvested on CPF. Records: TLO/Harvest Basket/GIS records all timber harvest volumes, etc. Harvest records were reviewed at the audit and kept up-to-date. See C5.6.</p>
<p><b>8.2.c</b> The forest owner or manager periodically obtains data needed to monitor presence on the FMU of:</p> <ol style="list-style-type: none"> <li>1) Rare, threatened and endangered species and/or their <i>habitats</i>;</li> <li>2) Common and rare plant communities and/or habitat;</li> <li>3) Location, presence and abundance of invasive species;</li> <li>4) Condition of protected areas, set-asides and buffer zones;</li> <li>5) High Conservation Value Forests (see Criterion 9.4).</li> </ol>	<p>C</p>	<p>All RTE species sites, community types, buffer areas, and HCVs are recorded in GIS. RTE species, habitats, etc. data from PA Natural Heritage Program every 5 yrs. or less. Full HCVF evaluation in 2011, followed by another full data request in 2015 for 2016 HCVF update. HCVF update occurred in 2021 based on PA Natural Heritage Program data. Invasives documented is an ongoing process, and annual invasives treatments documented in GIS and monitoring reports.</p> <p>Updates to GIS are made as data from public agencies is received. For example, an updated was a report of a goshawk on Warren 21 that borders USFS land was added in 2014 to GIS due to sharing of information from USFS. A similar situation happened on McKean 1 that borders USFS northern long-eared bat hibernacula.</p>
<p><b>8.2.d.1</b> Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.</p>	<p>C</p>	<p>All harvesting is followed up with monitoring protocols, revisit dates, next action recommendations, etc. Monitoring information is recorded in GIS and Access Database (Harvest Basket).</p>
<p><b>8.2.d.2</b> A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.</p>	<p>C</p>	<p>Water quality monitoring stations are used to record stream data (sediment, water volume, etc.). Road surveys and prioritized maintenance plans are ongoing process. See FMP, sections O and Q.</p>
<p><b>8.2.d.3</b> The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).</p>	<p>C</p>	<p>See FMP, sections N and Q. Refer to annual PowerPoint presentations, which are used to record and summarize this information. CPF also maintains records of public meetings. Most recent 2021 Public Monitoring Report was reviewed in PDF format. Public summary has been completed but have not yet had a public meeting since</p>



		2017. The biggest change over the past five years has been the elimination of the dimension lumber mill at the mill site, which has lowered overall full-time equivalent employees to about 80 from 90.
<b>8.2.d.4</b> Stakeholder responses to management activities are monitored and recorded as necessary.	C	Staff maintains records of emails from stakeholders, as verified in CPF office. Stakeholder responses may be documented in recreational trail and special event agreements (e.g., Tour de Forest).
<b>8.2.d.5</b> Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).	C	Refer to FMP (p.p. 57-58). CPF invited consultation and joint monitoring in 2021, as confirmed via review of a letter dated June 2021. Also on server location I:\Kane\Shared Files and Folders\Foresters\FSC Forest Management\Tribal Consultations\CPFTribalConsultationsInvit2011
<b>8.2.e</b> The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	C	Interview with controller. Budgeted amounts are tracked weekly and profits/losses analyzed monthly. The forestry team reviews the expense analysis sheet after the information has been shared. Observed expense analysis sheet and reviewed with controller.
<b>8.3 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>	C	
<b>8.3.a</b> When forest products are being sold as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	See COC indicators for FMEs.
<b>8.3.b</b> The forest owner or manager maintains documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	See COC indicators for FMEs.
<b>8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.</b>	C	
<b>8.4.a</b> The forest owner or manager monitors and documents the degree to which the objectives stated in the management plan are being fulfilled, as well as significant deviations from the plan.	C	No significant deviations from objectives have been found according to interviews with CPF staff outside of the issues with ash and beech mortality. This issue will be addressed in the update to the forest inventory analysis and AAH to be complete by 2022.
<b>8.4.b</b> Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational	C	Confirmed through interviews with CPF staff, current monitoring shows consistent progress toward goals documented in the 2011 FMP, 2008 CPF Strategic Plan & 2010 Addendum, Water Quality Monitoring, and Socioeconomic indicators. The issue of ash and beech

<p>plans, and/or other plan implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines are modified.</p>		<p>mortality will be addressed in the update to the forest inventory analysis and AAH to be complete by 2022. The FMP will then be updated in 2022-23.</p>
<p><b>8.5 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></p>	<p>C</p>	
<p><b>8.5.a</b> While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.</p>	<p>C</p>	<p>Confirmed through interviews and document review (2021 Public Monitoring Report.pdf). The summary is available upon request.</p>
<p><b>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.</b></p> <p><b>High Conservation Value Forests are those that possess one or more of the following attributes:</b></p> <ul style="list-style-type: none"> <li><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></li> <li><b>b) Forest areas that are in or contain rare, threatened or endangered ecosystems</b></li> <li><b>c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)</b></li> <li><b>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).</b></li> </ul>		
<p><b>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.</b></p>	<p>C</p>	
<p><b>9.1.a</b> 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>During 2011, CPF used information from its own forest inventory and stand typing, as well as information derived from publications and consultations with The Nature Conservancy, Western PA Conservancy, Bureau of Forestry, US Forest Service and Penn State. Results are documented in the FMP page 21-37.</p> <p>CPF regularly updates tracking of RTE/HCVF resources within their GIS database through contacts with the PA DCNR and the W.PA Conservancy including new information in the PA Natural Diversity Index. Locations of known and historical populations of Rare, Threatened, and Endangered species are mapped in the GIS both</p>

		through GPS field verification and aerial photo interpretation. These sites are then included in CPF Protection Zones coverage in either the Riparian or Unique Management Area categories. This database and GIS system were most recently updated during winter 2015-16 as a result of new PMDI information from and as a result HCVF locations have been updated appropriately.
<b>9.1.b</b> In developing the assessment, the forest owner or manager consults with qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.	C	Confirmed through document review (FMP page 21-37). CPF documented the consultations conducted in 2011 to update its HCVF classification process; stakeholders consulted are identified in the FMP. New HCVs were identified during late 2015 as a result of the most recent PNDI update of the RTE database, but additions to HCV area have been made since that time.  Warren 33 HCV 4 designation was reviewed. HCV for provision of drinking water. Agreement was made with neighboring landowner only to harvest during frozen condition; this block could be harvested as early as the winter of 2021-22, depending on weather conditions.
<b>9.1.c</b> 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.	C	See <a href="http://www.collinsco.com/certified-forests">http://www.collinsco.com/certified-forests</a> for the assessment results.
<b>9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</b>	C	
<b>9.2.a</b> 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	HCVF locations were selected in consultation with specialists from USFS, the PA Game Commission, DCNR, and Pennsylvania State University on a range of wildlife, ecological, and biodiversity topics. CPF conducts further stakeholder consultations regarding HCV areas if there are new land acquisitions.  CPF also analyzes new PNDI data every five years to review the State’s latest RTE dataset and determine whether new protected areas are required.  Conformance with this indicator is also confirmed through document review (FMP pp. 21-37).
<b>9.2.b</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	CPF does not own or manage any public forests.

<p><b>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.</b></p>	<p>C</p>	
<p><b>9.3.a</b> 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>Confirmed through document review (FMP page 21-37). See <a href="http://www.collinsco.com/certified-forests">http://www.collinsco.com/certified-forests</a> for the section on HCVF.</p>
<p><b>9.3.b</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>HCVF 4 areas are found on the FMU (e.g., McKean) within the City of Bradford’s Marilla reservoirs and CPF uses uneven-aged management, filter strips, and restrictions on timing of operations in this area to protect identified watershed and water quality values.</p>
<p><b>9.3.c</b> 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>CPF collaborated with USFS’s process of selecting wildlife and riparian corridors and connected corridors where possible into USFS adjoining lands. For example, bat hibernacula buffers that cross into the FMU are established and protected as described in US Fish &amp; Wildlife guidelines. Confirmed through interviews and GIS demonstrations that CPF management activities are in conformance with harvesting restrictions in these areas.</p>
<p><b>9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</b></p>	<p>C</p>	
<p><b>9.4.a</b> 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>Interviews with FME staff and review of documentation showed that CPF monitors HCV areas in multiple ways on an annual basis. The audit team reviewed the Annual Monitoring Report 2021, which corroborated this.</p> <p>The most formal and extensive HCV monitoring is for water quality of exceptional value streams. Other HCV monitoring includes database review and surveys for RT&amp;E species as well as when inventory plots fall into HCV’s.</p>
<p><b>9.4.b</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>There was no change resulting from activities by CPF in water quality, but if there was found to be problem CPF policy would be to adjust their management activities affecting the water quality. CPF has found that invasive species have affected some HCVs and has implemented eradication activity in collaboration with other stakeholders.</p>

<p><b>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.</b></p>	
<p>Through an examination of management practices (e.g., silvicultural system, rotation/ re-entry periods, etc.) and species composition, SCS has determined that CPF's management system qualifies as natural/ semi-natural per FSC definitions.</p>	

<b>APPENDICES</b>	
<p><b>APPENDIX C: REGIONAL LIMITS AND OTHER GUIDELINES ON OPENING SIZES: Indicator 6.3.g.1</b>                      This Appendix contains regional Indicators and guidance pertinent to maximum opening sizes and other guidelines for determining size openings and retention. These Indicators are requirements based on FSC-US regional delineations</p>	
<p><b>APPALACHIA REGION</b></p>	
<p><b>6.3.g.1.a</b> When even-aged silviculture (e.g., seed tree, regular or irregular shelterwood), or deferment cutting is employed, live trees and native vegetation are retained and opening sizes are created within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime in each community type, unless retention at a lower level is necessary for restoration or rehabilitation purposes. Harvest openings with no retention are limited to 10 acres.  <i><b>Guidance:</b> Even-age silviculture is used only where naturally occurring species are maintained or enhanced. Retention within harvest units can include riparian and streamside buffers and other special zones. In addition, desirable overstory and understory species may be retained outside of buffers or special zones while allowing for regeneration of shade-intolerant and intermediate species consistent with overall management principals. Where stands have been degraded, less retention can be used to improve both merchantable and non-merchantable attributes.</i></p>	<p>C</p> <p>CPF retains a component of overstory trees within regeneration openings. In addition, buffer zones are left along water courses. Retention trees are selected from all size classes and CPF maintains a diversity of species. The most common disturbance regimes in this region are wind (including tornadoes), ice, frost, and pathogens. CPF's shelterwood systems mimic these disturbance patterns.</p> <p>CPF employees clumped and diverse retention methods within all even-aged units as shelterwood systems are almost exclusively used. No harvest openings larger than 10 acres without retention were encountered in the 2021 recertification audit.</p>
<p><b>6.3.g.1.b</b> When uneven age silvicultural techniques are used (e.g., individual tree selection or group selection), canopy openings are less than 2.5 acres.  <i><b>Applicability note:</b> Uneven age silvicultural techniques are used when they maintain or enhance the overall species richness and biologic diversity, regenerate shade tolerant or intermediate-tolerant species, and/or provide small canopy openings to regenerate shade-intolerant and intermediate species. Uneven-age techniques are generally used to develop forests with at least three age classes. Uneven age silviculture is</i></p>	<p>C</p> <p>CPF very rarely uses uneven-age techniques. No group selection harvests have been conducted since the last audit; all recent uneven-aged management harvests have been single-tree selection.</p>

*employed to prevent high-grading and/or diameter limit cutting.*

**APPENDIX E: STREAMSIDE MANAGEMENT ZONE (SMZ) REGIONAL REQUIREMENTS: Indicator 6.5.e**  
 This Appendix addresses regionally explicit requirements for Indicator 6.5.e and includes SMZ widths and activity limits within those SMZs for the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions. The forest owner or manager will be evaluated based on the sub-indicators within their specific region, below.

**APPALACHIA REGION:** *The SMZ is designed to allow harvesting and provide flexibility for silvicultural management.*

<p><b>6.5.e.1.a</b> All <i>perennial streams</i> have buffers (streamside management zones, SMZs) that include an inner SMZ and an outer SMZ. SMZ sizes are minimum widths that are likely to provide adequate riparian habitat and prevent siltation. If functional riparian habitat and minimal siltation are not achieved by SMZs of these dimensions, wider SMZs are needed.</p>	<p>C</p>	<p>CPF has adopted the guidelines described in table 6.5.f. Auditors verified that SMZ exceed or meet widths in the field. With changing slope conditions SMZ were widened as required by the standard. See FMP pp. 32-33.</p>
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**Table 6.5.f (APP only) Widths of inner and outer Streamside Management Zones. Widths of outer SMZs are applicable where data do not support narrower widths\***

Stream Zone Type	SLOPE CATEGORY				
	1-10%	11-20%	21-30%	31-40%	41%+
<b>Inner Zone (Perennial)</b>	25'	25'	25'	25'	25'
<b>Outer Zone (Perennial)</b>	55'	75'	105'	110'	140'
<b>Total For Perennial</b>	80'	100'	130'	135'	165'
<b>Zone For Intermittent</b>	40'	50'	60'	70'	80'

\*All distances are in feet -slope distance and are measured from the high water mark.

<p><b>6.5.e.1.b</b> (APP only) The inner SMZ for <i>non-high-quality waters</i> (see state or local listings describing the highest quality waters in the state or region) extends 25 feet from the high water mark. Single-tree selection or small group selection (2-5 trees) is allowed in the inner SMZ, provided that the integrity of the stream bank is maintained and canopy reduction does not exceed 10 percent (90 percent canopy maintenance). Trees are directionally felled away from streams. Note: The inner SMZ is designed as a virtual no-harvest zone, while allowing the removal of selected high-value trees.</p>	<p>C</p>	<p>CPF does not harvest within the inner SMZ, as confirmed through field observation and interviews with CPF staff. See FMP pp. 32-33.</p>
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<p><b>6.5.e.1.c</b> (APP only) Along perennial streams that are designated as <i>high-quality waters</i> (see state or local listings describing the highest quality waters in the state or region), no harvesting is allowed in the inner SMZ (25 feet from the high water mark), except for the removal of wind-thrown trees. Stream restoration is allowed if a written restoration plan provides a rational justification and if the plan follows local and regional restoration plans.</p>	<p>C</p>	<p>CPF does not harvest within the inner SMZ, as confirmed through field observation and interviews with CPF staff. See FMP pp. 32-33.</p>
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<p><b>6.5.e.1.d</b> (APP only) Outer SMZs, outside and in addition to inner SMZs, are established for all intermittent, and perennial streams, as well as other waters. When the necessary information is available, the width of a stream management zone is based on the landform, erodibility of the soil, stability of the slope, and stability of the stream channel as necessary to protect water quality and repair habitat. When such specific information is not available, the width of streamside management zone is calculated according to Table 6.5.f</p>	C	<p>In the inner SMZ CPF has no harvest activity, and within the outer SMZ it maintains a minimum of 50% canopy cover. On field visit the auditor verified this and, in all cases, the outer SMZ had at least 50% cover and that the width of stream side cover area increased with increasing slope.</p>
<p><b>6.5.e.1.e</b> (APP only) Harvesting in outer SMZs is limited to single-tree and group selection, while maintaining at least 50 percent of the overstory. Roads, skid trails, landings, and other similar silviculturally disturbed areas are constructed outside of the outer SMZ, except for designated stream crossings or when placement of disturbance-prone activities outside of the SMZ would result in more environmental disturbance than placing such activities within the SMZ. Exceptions may be made for stream restoration.</p>	C	<p>See 6.5.e.1.d. Limited crossings were observed. Crossings when permitted by local authorities and only at designated areas. CPF must follow BMPs and any conditions of permits for stream crossings.</p>
<p><b>6.5.e.1.f</b> (APP only) The entire SMZ of intermittent streams is managed as an outer buffer zone.</p>	C	<p>CPF adheres at least to the 50% canopy retention guidelines in these areas.</p>
<p><b>6.5.e.1.g</b> (APP only) The activities of forest management do not result in observable siltation of intermittent streams. The activities of forest management do not result in observable siltation of intermittent streams.</p>	C	<p>No siltation of intermittent streams was observed or reported during the 2021 recertification audit. The water quality reports for the preceding years do not indicate any siltation.</p>

### Appendix 7 – Chain of Custody Indicators for FMEs Conformance Table

REQUIREMENT	C/NC/NA
<b>1. Quality Management</b>	
<p>1.1 The FME shall appoint a management representative as having overall responsibility and authority for the organization’s compliance with all applicable requirements of this standard.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC
<b>Evidence 1.1:</b> Per interviews with staff and review of the FME’s Operations Manual, the representative is identified.	
<p>1.2 A system shall be implemented to track and trace all products that are sold with an FSC Claim from the <i>forest of origin</i> to the <i>forest gate(s)</i>. When legally required, and for group and multiple FMU certificates, this system shall also be documented.  <i>The forest of origin should be the smallest reportable manageable unit, such as a tax parcel. It shall never be larger than a Forest Management Unit (FMU).</i>  <i>The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.</i></p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA, FME does not sell any products with an FSC claim
<b>Evidence 1.2:</b> Confirmed via review of the Operations Manual, FMP (2018; F-2018 Addendum - Statement on Forest Gates) and interviews with staff.	
<p>1.3 The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC

<p><b>Evidence 1.3:</b> Current sale and training records were reviewed for a sample of staff (Tom Kase, 06/01/2021; and John Williams, 06/15/2020). Training is provided by American Green Consulting Group, LLC. Operations Manual specifies a 5-year record retention time. Refer to sales records below.</p>	
<p>1.4 The FME shall define its <i>forest gate(s)</i> (check all that apply):</p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC</p>
<p><input checked="" type="checkbox"/> <b>Stump</b> <i>Stumpage sale or sales of standing timber; transfer of ownership of certified-forest product occurs upon harvest.</i></p>	
<p><input type="checkbox"/> <b>On-site concentration yard</b> <i>Transfer of ownership of certified-product occurs at concentration yard under control of FME.</i></p>	
<p><input type="checkbox"/> <b>Off-site Mill/ Log Yard/ Port</b> <i>Transfer of ownership occurs when certified-product is unloaded or paid for at purchaser's facility or a facility under the purchaser's control.</i></p>	
<p><input type="checkbox"/> <b>Auction house/ Brokerage</b> <i>Transfer of ownership occurs at a government-run or private auction house/ brokerage.</i></p>	
<p><input checked="" type="checkbox"/> <b>Lump-sum sale/ Per Unit/ Pre-Paid Agreement</b> <i>A timber sale in which the buyer and seller agree on a total price for marked standing trees or for trees within a defined area before the wood is removed — the timber is usually paid for before harvesting begins. Similar to a per-unit sale.</i></p>	
<p><input checked="" type="checkbox"/> <b>Log landing</b> <i>Transfer of ownership of certified-product occurs at landing/yarding areas.</i></p>	
<p><input type="checkbox"/> <b>Other</b> (Please describe):</p>	
<p>1.5 The FME shall have sufficient control over its <i>forest gate(s)</i> to ensure that there is no risk of mixing of FSC-certified forest products covered by the scope of the FM/COC certificate with forest products from outside of the scope prior to the transfer of ownership.</p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA, FME does not sell any products with an FSC claim</p>
<p><b>Evidence 1.4/1.5:</b> There is no risk of products from non-certified sources being mixed with products from the forest area evaluated. No areas are excluded from the scope of this certificate; all land owned by the FME is included in this certificate. The FMP 2018 F-2018 Addendum - Statement on Forest Gates describes three forest gates: 1) stump, which is how nearly all transactions are handled; ownership transfers to the company mill upon harvest; 2) Lump-sum or per unit agreement for third-party buyers of standing timber; and 3) log landing.</p> <p>Timber Harvesting Contracts include tracking documentation including property/tract/sale name and townships names and maps. This FME's forest products harvests sales are managed by the company-owned mill certificate. Most company-owned forest products are received at the company-owned mill and then managed as part of the mill's COC certificate. Other products (pulp and occasional logs) are sold and delivered under the mill's COC certificate to other customers from the landing. A ticket book is provided to truck haulers. Tickets have information to link them to the contract and certified tract, which is then entered into the mill's tracking system, which draws information from the company's tract data.</p> <p>Note: Most forest products from the FMU are not sold by CPF. CPF's forest products are delivered to the company-owned mill, which takes legal ownership under a separate COC certificate at the stump. Sales of most FSC products fall under the COC control system for the mill. Some logs are sold from log landings and may carry an FSC 100% upon request from either the COC or FM/COC certificate; however, no current buyers have requested FSC claims.</p>	
<p>1.6 The FME and its contractors shall not process FSC-certified material prior to transfer of ownership at the <i>forest gate(s)</i> without conforming to applicable chain of custody requirements. <i>NOTE: This does not apply to log cutting or de-barking units, small portable sawmills, on-site processing of chips/biomass or primary processing of Non-Timber Forest Products (NTFPs) under the FME's control (e.g., latex, rattan, maple syrup, etc.) originating from the FMU under evaluation.</i></p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA</p>
<p><b>Evidence 1.6:</b> Confirmed through field observation that no processing occurs prior to transfer of ownership to the mill.</p>	



<p>1.7 The FME has supported transaction verification conducted by SCS and Assurance Services International (ASI) by providing samples of FSC transaction data as requested by SCS. <i>NOTE: Pricing information is not within the scope of transaction verification data disclosure.</i></p>	<p><input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA, no verification requested</p>
<p>1.8 The FME shall support fiber testing by surrendering samples and specimens of materials and information about species composition and the location where the sample originated for verification, as requested by its certification body, ASI or FSC.</p>	<p><input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA, no verification requested</p>
<p><b>Evidence 1.7/1.8:</b></p>	
<p><b>2. Product Control, Sales and Delivery</b></p>	
<p>2.1. Products from the certified forest area shall be identifiable as certified at the <i>forest gate(s)</i>.</p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA, FME does not sell any products with an FSC claim</p>
<p><b>Evidence 2.1:</b> Timber Harvesting Contracts include tracking documentation including property/tract/sale name and townships names and maps. Company-wide procedures and tracking documents (trip tickets, load slips, contracts and maps) enable the tracking of materials from the origin to the company-owned mill’s ownership and tracking systems. CPF’s forest products harvests are managed by the company-owned mill. Most company-owned forest products are received at the company-owned mill and then managed as part of the mill’s COC certificate. Other products (pulp and some logs) are sold and delivered from the forest gate (landing) under the mill’s COC certificate to other customers. However, per interviews with staff, all sales of certified material in 2021 have been direct to the company mill.</p>	
<p>2.2 Information about all products sold shall be compiled and documented for all FMUs in the scope of certification, including:</p> <ol style="list-style-type: none"> <li>1) Common and scientific species name;</li> <li>2) Product name or description;</li> <li>3) Volume (or quantity) of product;</li> <li>4) Information to trace the material to the source of origin harvest block;</li> <li>5) Harvest date;</li> <li>6) If basic processing activities take place in the forest, the date and volume/quantity produced; and</li> <li>7) Whether or not the material was sold with an FSC Claim.</li> </ol>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC</p>
<p><b>Evidence 2.2:</b> Confirmed via review of species list, PGL in public summary report (Section A), and annual harvest summary. All material transferred to the mill carries an FSC claim. Material sold from log landings to third-party buyers does not carry an FSC claim. At this time, the FME does not have sufficient data to report on the volumes sold without an FSC claim. This will not become a requirement until the FSC-US, V2-0, standard is finalized.</p>	

<p>2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information:</p> <ul style="list-style-type: none"> <li>a) name and contact details of the FME;</li> <li>b) information to identify the customer, such as their name and address;</li> <li>c) date when the document was issued;</li> <li>d) product name or description, including common and scientific species name(s);</li> <li>e) quantity of products sold;</li> <li>f) the FME’s FSC Forest Management (FM/COC) or FSC Controlled Wood (CW/FM) code;</li> <li>g) clear indication of the FSC claim for each product item or the total products as follows:             <ul style="list-style-type: none"> <li>i. the claim “FSC 100%” for products from FSC 100% product groups; or</li> <li>ii. the claim “FSC Controlled Wood” for products from FSC Controlled Wood product groups.</li> </ul> </li> </ul>	<input type="checkbox"/> C <input checked="" type="checkbox"/> NC <input type="checkbox"/> NA, FME does not sell any products with an FSC claim
<p>2.4 If the sales documentation issued by the FME is not included with the shipment of the product and this information is relevant for the customer to identify the product as being FSC certified, the related delivery documentation has included the same information as required in indicator 2.3 and a reference linking it to the sales documentation.</p> <p><b>Note: 2.3 and 2.4 are based on FSC-STD-40-004 V3-0 Clauses 5.1 and 5.3</b></p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA, delivery documentation not required or FME is not responsible for issuing delivery documentation <input type="checkbox"/> NA, FME does not sell any products with an FSC claim
<p><b>Evidence 2.3/2.4:</b> Ownership of most wood is transferred upon harvest to the company-owned mill. Invoices from the company-owned mill (not CPF) include information required for the company-owned mill. Item h is a load slip or trip ticket that is issued under the company-owned mill’s COC certificate and includes a stamp with required information from the FM/COC certificate. Since information for both certificates is the same and the mill is the FM/COC certificate’s “customer,” this requirement is met. Reviewed contract (Oct/12/20) and sample scale ticket (25913) for Potter 3, Blocks 2 and 3.</p> <p>The 2018 FMP <i>F-2018 Addendum - Statement on Forest Gates</i> includes incorrect information on the FME’s certificate code and its affiliated mill’s certificate code (SCS-COC-00007N to SCS-FM/COC-000023 rather than SCS-FM/COC-00007N to SCS-COC-000023. The FSC claim (FSC 100%) is also missing. This primarily affects in the case of transfer of ownership at the stump to the mill.</p> <p>While the FME has not used its other two possible forest gates, lump-sum/per unit agreement and log landing, there is not enough information included in this addendum to inform the reader how the FME intends to communicate its FSC code and claim to these buyers. Per interviews with staff, the FME has a stamp it applies to documentation for sales from the log landing. See <b>Minor CAR 2021.3</b>.</p>	
<p>2.5 If the FME is unable to include the FSC claim and/or certificate code in sales or delivery documents, the required information has been provided to the customer through supplementary documentation (e.g. supplementary letters). In this case, the FME has obtained permission from SCS to implement supplementary documentation in accordance with the following criteria:</p> <ul style="list-style-type: none"> <li>a. there shall exist clear information linking the supplementary documentation to the sales or delivery documents;</li> <li>b. there is no risk that the customer will misinterpret which products are or are not FSC certified in the supplementary documentation; and</li> <li>c. where the sales documents contain multiple products with different FSC claims, each product shall be cross-referenced to the associated FSC claim provided in the supplementary documentation.</li> </ul>	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA, all information included per 2.3 and/or 2.4
<p><b>Evidence 2.5:</b></p>	

<p>2.6 The FME may identify products exclusively made of input materials from small or community producers by adding the following claim to sales documents: “From small or community forest producers.” This claim can be passed on along the supply chain by certificate holders.  <i>A forest management unit (FMU) or group of FMUs that meet(s) the small and low-intensity managed forest eligibility criteria (FSC-STD-1-003a) and addenda. A community FMU must comply with the tenure and management criteria defined in FSC-STD-40-004.</i></p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA, not a small or community producer; or does not wish to pass along this claim
<p><b>Evidence 2.6:</b></p>	
<p><b>3. Labeling and Promotion</b></p>	
<p><input type="checkbox"/> NA – FME does not use/ intend to use trademarks and no trademark uses were detected during the audit.</p>	
<p><input type="checkbox"/> NA – <b>CW/FM certificates are not allowed to use FSC trademarks and no trademark uses were detected during the audit</b> (Note: it is a Major nonconformity to 3.1 if CW/FM certificates are found to be using trademarks).</p>	
<p>3.1 The FME shall adhere to relevant trademark use requirements of FSC-STD-50-001 described in the <i>SCS Trademark Annex for FMEs</i>.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC
<p><b>Evidence 3.1:</b> Refer to evidence and findings cited in applicable trademark checklist(s) cited below.</p>	
<p><input type="checkbox"/> FSC trademark use was detected for a CW/FM certificate as described in Major CAR for 3.1, FSC-STD-30-010, Annex 3, 1.2, and FSC-STD-50-001, 2.1e and 11.2:</p>	
<p><b>4. Outsourcing</b></p>	
<p><input type="checkbox"/> NA – FME does not outsource any COC-related activities, as confirmed via interviews, sales documentation, and field observation.</p>	
<p><input checked="" type="checkbox"/> NA – FME outsources low-risk activities such as transport and harvesting, as confirmed via interviews, sales documentation, and field observation.</p>	
<p>4.1 The FME shall provide the names and contact details of all outsourced service providers.</p>	<input type="checkbox"/> C <input type="checkbox"/> NC
<p>4.2 The FME shall have a control system for the outsourced process and agreement which ensures that:</p> <ul style="list-style-type: none"> <li>a) The material used for the production of FSC-certified material is traceable and not mixed with any other material prior to the point of transfer of legal ownership;</li> <li>b) The outsourcer keeps records of FSC-certified material covered under the outsourcing agreement;</li> <li>c) The FME issues the final invoice for the processed or produced FSC-certified material following outsourcing;</li> <li>d) The outsourcer only uses FSC trademarks on products covered by the scope of the outsourcing agreement and not for promotional use;</li> <li>e) The outsourcer does not further outsource the material; and</li> <li>f) The outsourcer accepts the right of the certificate body to audit them.</li> </ul>	<input type="checkbox"/> C <input type="checkbox"/> NC
<p><b>Evidence 4.1/4.2:</b></p>	
<p><b>5. Training and/or Communication Strategies/</b></p>	
<p>5.1 All relevant FME staff and outsourcers shall be trained in the FME’s COC control system commensurate with the scale and intensity of operations and shall demonstrate competence in implementing the FME’s COC control system.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC
<p>5.2 The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings or communications, the intended frequency of COC training (e.g., training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc.).</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC
<p><b>Evidence 5.1/5.2:</b> CPF procedures, interviews and training records confirm conformance. FME outsourced COC training to American Green Consulting Group, LLC, which has an online system for trainings and records that requires annual training for relevant staff.</p>	

## Appendix 8 – Trademark Standard Conformance Table

1. General Requirements for Use of the FSC Trademarks (FSC “checkmark-and-tree” logo, initials “FSC,” and/or name “Forest Stewardship Council”)		
Trademark uses reviewed:		
Trademark Application (on-product/promotional)	Case Approval #, or Email (include approver name & date), or other appropriate documentation	Are all elements correct? (e.g., trademark symbol, color scheme, size, etc.) If not, describe in Nonconformities below.
Promotional (directory)	348734	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Collins Hardwood - Spec Sheet	348732	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Collins Hardwood Stock List	334758	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Collins Hardwood Stock List for HMR	334757	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
Email signature	Email approval (2/6/20; Melanie Phipps)	Y <input checked="" type="checkbox"/> N <input type="checkbox"/>
<input type="checkbox"/> All known uses reviewed. <input checked="" type="checkbox"/> Sample reviewed. Rationale that sample choice is sufficient to confirm requirements are met: <i>FME handles all TM approvals for all its certificates at the corporate level. There is a single staff person in charge of TM use and all uses apply company-wide (i.e., to each of the company’s FSC certificates). All uses are promotional.</i> <input type="checkbox"/> Trademark uses detected include those grandfathered in under prior FSC trademark rules (e.g., FSC-TMK-50-201). Place the initials “GF” by the specific Trademark Applications above. <i>Note: This only applies to printed items or physical promotional materials (e.g., hats, load tickets) in stock. New printings, items, and websites must be updated per FSC-STD-50-001 requirements. If the organization only has GF uses and no new uses, the rest of this checklist is NA.</i>		
<b>1.2 Trademark License Agreement and valid certificate</b> In order to use these FSC trademarks, the FME shall have a valid FSC trademark license agreement and hold a valid certificate. <i>Note: Consultations for certification Organizations applying for forest management certification or conducting activities related to the implementation of controlled wood requirements, may refer to FSC by name and initials for stakeholder consultation.</i>		Maintained on file by SCS Main Office
<b>Evidence 1.2:</b> Maintained on file by SCS Main Office.		
<b>1.6 Product Group List</b> The products intended to be labeled or promoted as FSC certified have been included in the organization’s certified product group list.		<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS
<b>Evidence 1.6:</b> <input checked="" type="checkbox"/> Refer to Product Groups List in Public Summary Report; <input type="checkbox"/> The following nonconformance(s) were detected in Product Groups: _____ ; or <input type="checkbox"/> Refer to OBS related to Product Groups:		
<b>1.3 Trademark License Code</b> The FSC trademark license code assigned by FSC to the organization accompanies any use of the FSC trademarks. It is sufficient to show the code once per product or promotional material.		<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS
<b>1.4 Trademark Symbol</b> The FSC logo and the ‘Forests For All Forever’ marks shall include the trademark symbol ® in the upper right corner when used on products or materials to be distributed in a country where the relevant trademark is registered. For use in a country where the trademark is not yet registered, use of the symbol ™ is recommended. The Trademark Registration List document is available in the FSC trade-mark portal and marketing toolkit. The symbol ® shall also be added to ‘FSC’ and ‘Forest Steward-ship Council’ at the first or most prominent use in any text; one use per material is sufficient (e.g. website or brochure).		<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input type="checkbox"/> NA, one or more of noted exceptions applies

<i>NOTE: The use of the trademark symbol is not required for FSC claims in sales and delivery documents, or for the disclaimer statement specified in requirement 6.2.</i>	
<b>2.1 Restrictions on using FSC trademarks</b> The organization <b>has not used</b> the FSC trademarks in the following ways: a) in a way that could cause confusion, misinterpretation, or loss of credibility to the FSC certification scheme; b) in a way that implies that FSC endorses, participates in, or is responsible for activities performed by the organization, outside the scope of certification; c) to promote product quality aspects not covered by FSC certification; d) in product brand or company names, such as ‘FSC Golden Timber’ or website domain names; e) in connection with FSC controlled wood or controlled material – they shall not be used for labelling products or in any promotion of sales or sourcing of controlled material or FSC controlled wood; the initials FSC shall only be used to pass on FSC controlled wood claims in sales and de-livery documentation, in conformity with FSC chain of custody requirements.	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS
<b>2.2 Translations</b> The name ‘Forest Stewardship Council’ has not been replaced with a translation. A translation may be included in brackets after the name, for example: Forest Stewardship Council® (translation)	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input checked="" type="checkbox"/> NA, no translations
<b>Evidence 1.3, 1.4, 2.1, and 2.2:</b> <input checked="" type="checkbox"/> Refer to Trademark uses reviewed above; <input type="checkbox"/> The following nonconformance(s) were detected ; or <input type="checkbox"/> Refer to OBS:	
<b>Sections 8 and 9 Graphic Rules</b> The organization has only used FSC logos that conform to the standard requirements governing: <ul style="list-style-type: none"> <li>• color and font (8.1-8.3);</li> <li>• format and size (8.4-8.9);</li> <li>• label placement (8.10); and</li> <li>• ‘Forests For All Forever’ marks (9.1-9.7).</li> </ul>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS
<b>1.5 Trademark Use Approval</b> The organization has submitted all intended uses of the FSC trademarks to SCS for approval. OR The organization has <b>an approved trademark use management system</b> in place. (If the organization has a trademark use management system, complete Annex A.)	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS
<b>4.6 FSC trademarks may be used to identify FSC-certified materials in the chain of custody before the products are finished. It is not necessary to submit such segregation marks for approval. All segregation marks shall be removed before the products go to the final point of sale or are delivered to uncertified organizations.</b>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input checked="" type="checkbox"/> NA, trademarks not used for segregation marks
<b>Evidence Graphic Rules, 1.5, and 4.6:</b> <input checked="" type="checkbox"/> Refer to Trademark uses reviewed above; <input type="checkbox"/> The following nonconformance(s) were detected ; or <input type="checkbox"/> Refer to OBS:	

**2. On-Product Use of FSC Trademarks**  
 NA, no use of on-product trademarks (*on-product checklist may be deleted*)

**3. Promotional Use of FSC Trademarks**  
 NA, no use of promotional trademarks (*promotional checklist may be deleted*)

<p><b>6.1 Catalogues, Brochures, and Websites</b>                  When the FSC trademarks have been used in catalogues, brochures, or websites, the following requirements apply:</p> <ul style="list-style-type: none"> <li>• It is sufficient to present the promotional elements only once in catalogues, brochures, websites, etc.</li> <li>• If both FSC-certified and uncertified products are listed then a text such as “Look for our FSC®-certified products” shall be used next to the promotional elements and the FSC-certified products shall be clearly identified.</li> <li>• If some or all of the products are available as FSC certified on request only, this is be clearly stated.</li> </ul>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input type="checkbox"/> NA, not using trademarks in catalogues/ brochures/websites
<p><b>6.2 Sales and Delivery Documents</b>                  When the FSC trademarks are included on sales or delivery document templates that may be used for both FSC and non-FSC products, the following or a similar statement is included: “Only the products that are identified as such on this document are FSC certified”.  <i>NOTE: Use of the FSC claim and certificate code on the invoices does not qualify as FSC trademark use.</i></p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input checked="" type="checkbox"/> NA, not using trademarks on templates for FSC & non-FSC products
<p><b>6.3 Promotional Items</b>                  All promotional items (e.g., mugs, pens, T-shirts, caps, banners, vehicles, etc.) have displayed, at minimum, the FSC logo and FSC trademark license code.</p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input checked="" type="checkbox"/> NA, not labeling promotional items
<p><b>6.5 Trade Fairs</b>                  When the FSC trademarks are used for promotion at trade fairs, the organization has:</p> <ol style="list-style-type: none"> <li>clearly marked which products are FSC certified, or</li> <li>add a visible disclaimer stating “Ask for our FSC®-certified products” or similar if no FSC-certified products are displayed.</li> </ol> <p><i>NOTE: Use of text to describe the FSC certification of the organization does not require a disclaimer.</i></p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input checked="" type="checkbox"/> NA, not using trademarks at trade fairs
<p><b>Section 6.6 and 6.7 Investment/Financial Claims</b>                  6.6 When investment companies or others are making financial claims based on the organization’s FSC certified operations, the organization has taken full responsibility for the use of the FSC trademarks.                  6.7 Any such claims have been accompanied by the disclaimer, “FSC is not responsible for and does not endorse any financial claims on returns on investments.”</p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input checked="" type="checkbox"/> NA, not making financial claims about FSC status
<p><b>7.1 and 7.2 Other Forestry Certification Scheme Logos</b>                  The FSC trademarks have not been used together with the marks of other forest certification schemes in a way which implies equivalence, or in a way which is disadvantageous to the FSC trademarks in terms of size or placement.</p>	<input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input checked="" type="checkbox"/> NA, not using other scheme logos
<p><b>7.3 Business Cards</b>                  The FSC trademarks have not used on business cards to promote the organization’s certification. The FSC logo or ‘Forests For All Forever’ marks are not used on business cards for promotion. A text reference to the organization’s FSC certification, with license code, is allowed, for example “We are FSC® certified (FSC® C#####)” or “We sell FSC®-certified products (FSC® C#####)”.</p>	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS <input type="checkbox"/> NA, approval granted prior to July 1, 2011
<p><b>7.4 Promotion with CB Logo</b></p>	<input checked="" type="checkbox"/> C

FSC certified products have not been promoted using only the SCS Kingfisher and/or SCS Global Services logo.	<input type="checkbox"/> NC <input type="checkbox"/> C w/ OBS
<b>Evidence 6.1-6.3, 6.5-6.7, 7.1-7.4:</b> <input checked="" type="checkbox"/> Refer to Trademark uses reviewed above; <input type="checkbox"/> The following nonconformance(s) were detected ; or <input type="checkbox"/> Refer to OBS:	

<b>Annex A: Trademark use management system</b> <input checked="" type="checkbox"/> NA, not using a trademark management system ( <i>Annex A checklist may be deleted</i> )
<b>Annex B, Additional trademark rules for group FM certificate holders</b> <input checked="" type="checkbox"/> NA, not a group FM certificate or group does not use FSC trademarks ( <i>Annex B checklist may be deleted</i> )

## Appendix 9 – Peer Review and SCS Evaluation Team Response to Peer Review

A peer review was not conducted as part of this evaluation.