

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

Swanton Pacific Ranch-California Polytechnic State University Foundation

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

**CERTIFICATION REGISTRATION NUMBER
SCS-FM/COC-00071**

Submitted to:

Swanton Pacific Ranch – Davenport California

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Date of Report: November 2003

Date of Field Audit: September 2003

By:

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Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section B contains more detailed results and information for the use of the California Polytechnic State University Foundation, Swanton

Pacific

Ranch.

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SECTION A. PUBLIC SUMMARY & BACKGROUND INFORMATION

1.0 GENERAL INFORMATION

1.1 FSC DATA REQUEST

Name and contact information for the certified operation:

- Applicant entity: California Polytechnic State University Foundation, Swanton Pacific Ranch
- Contact person: Walter Mark
- Address: 125 Swanton Road, Davenport, CA 95017
- Telephone: (831) 427-1718
- E-mail: wmark@calpoly.edu
- Certified products: Redwood and Douglas-fir logs
- Number of Acres/hectares certified: 2997 acres
- Nearest Town: Davenport, CA
- Biome: Temperate Conifer
- Tenure: Private
- Forest Composition: coast redwood, Douglas-fir, Monterrey pine, and oak
- Managed as: Natural Forest

1.2 GENERAL BACKGROUND

Scientific Certification Systems, a certification body accredited by the Forest Stewardship Council (FSC), was retained by California Polytechnic State University Foundation, Swanton Pacific Ranch (SPR) to conduct a certification evaluation of its property. Under the FSC/SCS certification system, forest management operations meeting international standards of forest stewardship can be certified as “well managed”, thereby enabling use of the FSC endorsement and logo in the marketplace.

In September 2003, an interdisciplinary team of natural resource specialists was empanelled by SCS to conduct the evaluation. The team collected and analyzed written materials, conducted interviews and completed a 3-day field and office audit of the subject property as part of the certification evaluation. Upon completion of the fact-finding phase of the evaluation, the team assigned performance scores to the 45 FSC Criteria and, from those scores, generated weighted average performance scores for each of the 9 FSC Principles (Principle 10, plantation forestry, was deemed not applicable, in order to determine whether award of certification was warranted.

This report is issued in support of a recommendation to award FSC-endorsed certification to Swanton Pacific Ranch. As detailed below, certain pre-conditions (also known as Major Corrective Action Requests) that were stipulated by the audit team upon completion of the field audit were addressed by Dr. Walter Mark, Director, SPR and cleared by SCS prior to

finalization of this report. In the event that a certificate is awarded, Scientific Certification Systems will post this public summary of the report on its web site (www.scscertified.com).

1.3 FOREST MANAGEMENT ENTERPRISE

1.3.1 Background Information

As described in the *Swanton Ranch Draft Management Plan* (2003) approximately 1,435 acres of Swanton Pacific Ranch are forested (including the 80 acres owned by Al Smith's family for which Cal Poly has timber rights), of which 1,160 acres are dominated by conifers and 275 acres by hardwoods (Todd, 1988). In addition SPR owns and manages approximately 500 acres of redwood and Douglas-fir forestland in the Valencia Creek drainage.

On SPR, the conifer area is divided into three units, the Little Creek Unit, the Scotts Creek unit and the Satellite Stands. The management emphasis at the time of the audit was on the Little Creek Unit, which has the most merchantable timber. The Valencia property is divided into three units, with Unit 1 having 213 acres, Unit 2 having 254 acres and Unit 3 with 37 acres. A Non-Industrial Timber Management Plan (NTMP) was approved for Valencia Creek in June 2001. The main tree species on SPR and the Valencia property are coast redwood and Douglas-fir and mixed hardwood with a predominance of live oak and tanoak. The majority of all the forestlands were clear-cut at the turn of the century, creating an even-aged 100 year old forest.

The species component of the forest tends to change with elevation, redwood being the most prevalent closer to the valleys, changing to a greater preponderance of Douglas-fir in mid-slope and tanoak predominating the ridges.

1.3.2 Management Objectives

As described in the *Swanton Ranch Draft Management Plan* (2003), the main forest management objective is to develop and demonstrate uneven-aged forest management and sustainable yields. Other objectives of SPR's management include:

- Education- To expand the present educational facilities and curriculum so as to offer additional 'learn by doing' experiences including 'learning by living' at Swanton Pacific Ranch.
- Natural Habitat Management- To protect and enhance the natural functions and diversity of the varied ranch ecosystems.
- Agriculture- To foster healthy crop production with minimal cost and artificial inputs.
- Grassland- To improve the grassland and the water supply.

Additional details regarding visions, objectives, and specific goals for SPR can be found in the *Swanton Ranch Draft Management Plan* (2003).

1.3.3 Silvicultural Systems

As has been the long-term norm for this region, SPR practices selection silviculture that results in continuous forest cover. Harvest prescriptions are first oriented toward sanitation and salvage activities designed to capture mortality, and second toward spacing and

concentration of growth on the best phenotypes of the desired species. Much of the forest was essentially even-aged and silviculture has focused on moving the forest to uneven-aged. Unless dictated by inordinate mortality, the SPR selection harvest entries are planned to occur on 10-15 year intervals within a given stand. The emphasis in harvesting is to encourage growth while establishing an uneven-aged stand, rather than maximizing harvest potential. The timing of harvesting is primarily dependent on educational considerations rather than market factors.

1.3.4 Estimates of Maximum Sustainable Yield

The area of active timber management on the SPR is divided into three units, the Little Creek Unit, the Scotts Creek unit and the Satellite Stands. Additionally, the Valencia property is regulated as its own unit. On the Valencia property growth rates over the last 15 years, were 636 and 391 board feet per acre per year for units 1 and 2, respectively. To meet the SPR goal of increase growth harvesting will remain below 80% of growth for the SPR units and the Valencia property. Of the units located within SPR itself, management is currently focused on the Little Creek Unit. Continuous Forest Inventory (CFI) of the Little Creek Unit, area of current management, was conducted in 1989 and an estimated inventory of 26,163 bf/ac for redwood and 17,318 bf/ac for Douglas-fir. The CFI plots were re-established in 1997 by Larry Bonner and those measurements indicated an inventory of 28,612 bf/ac for redwood and 8,923 bf/ac for Douglas-fir.

1.3.5 Estimated, Current and Projected Production

Swanton Ranch Draft Management Plan (2003) reports harvests on the Little Creek Unit occurred in 1990-91 and 1993-95 and yielded 1.5 million bf each. According to an analysis conducted by Big Creek Lumber Company (1991) the estimated production on this unit is 200,000 BF per year or 500 BF per acre. For the Scotts Creek Unit a CFI was conducted by Steve Auten in January 2000, however an allowable cut has yet to be calculated. There have been no recent harvests in the Scotts Creek Unit. On the Valencia Creek Property the NTMP estimated growth rates in Unit 1 to be 636 bf per acre and a 15-year cutting cycle would allow 2,030,750 bf for the unit. For Unit 2 the estimated growth rate is 391 bf per acre and the 15-year cutting cycle would allow 1,489,238 bf for the unit.

1.4 ENVIRONMENTAL AND SOCIOECONOMIC CONTEXT

1.4.1 Environmental Context

The setting of SPR is dominated by the Santa Cruz Mountains, the most southerly extension of the coast redwood forest type in Central California, USA.

Coast Redwood Forest Type

Coast Redwood (*Sequoia sempervirens*) has limited distribution from southwestern Oregon southward to Salmon Creek in Monterey County, California. The species generally grows

near sea level to about 2,500 feet elevation and mainly on the seaward side of the coastal mountains within the fog belt.

Average rainfall throughout its range is 35 to 100 inches, with dense dripping fog in the summer. The growing season is 6 to 12 months, with 200 to 350 frost-free days. Temperature fluctuation is minimal both diurnally and seasonally, the mean summer maximum is 68°-84°F, the mean winter minimum is 33°-40°F.

South of San Francisco redwood is found on the seaward side of the coast range, covering crests and west slopes of the coast range in usually mixed associations with other tree and shrub species (*Pseudotsuga menziesii*, *Myrica californica*, *Lithocarpus densiflora*, *Vaccinium ovatum*, *Rhododendron macrophyllum*, *Oxalis oregana*, *Polystichum munitum*, and others). Throughout the Santa Cruz Mountains, the most common habitat associated with the redwood type is the Coast Oak Woodland (CWHR habitat type).

According to the CWHR system, the redwood habitats provide food, cover, or special habitat elements (for at least one season) for 193 species. This list includes 12 reptiles, 18 amphibians, 109 birds and 54 mammals. Of these species, 18 are considered harvest species. Depending on geographic location, sensitive species associated with the redwood type include: red-legged frog, *Ensatina*, osprey, ringtail, fisher and marbled murrelet.

Central Coast Ranges

Many sources do not separate the North Coast Range from the Central Ranges since geologically they are very similar. Selecting a southern terminus for this range is somewhat controversial since there is no sharp distinction between the Central Coast Ranges and the western Transverse Ranges.

The Central Coast Province is approximately 250 miles long and 50 miles wide. The mountains are not high, principally between 2,000 feet and 4,000 feet in altitude. Viewed from the sea, they appear as a continuous mountain wall rising from the sea with few intermittent breaks of small valleys and plains. Wide or long beaches are the exception; rather high coastal terraces are the norm.

The Santa Cruz Range, part of the larger Central Coast Range, is about 75 miles long and ranges in altitude from 2,000 feet just south of San Francisco to nearly 3,800 feet in the south. The eastern slope is dictated by the San Andreas fault line, which continues to traverse this region southward along the western base of the Diablo and Temblor Ranges. The Range is generally flat crested between San Francisco and Santa Cruz. South of Monterey Bay, the Santa Cruz Ranges, interrupted by the Pajaro River Valley are renamed the Gabilan Range.

1.4.2 Socioeconomic Context

The economy of Santa Cruz County relies heavily upon agriculture and tourism, with significant employment also in the areas of electronics-related manufacturing, computer

services, educational services, government and education. Although Santa Cruz County is rural in many respects, it has also developed traits and qualities of a more urban or metropolitan area, and thus, attracts local and tourist populations of diverse cultures and lifestyles. SPR's main influence to the socio-economic setting is its contribution of many educational opportunities to students of various disciplines- which could be further developed with expanded educational facilities.

1.4.3 High Value Conservation Forest

As required by FSC Principle 9, the evaluation team emphasized the importance of maintaining selected sites as High Value Conservation Forest within the defined forest area, and audited accordingly. HCVF may include unique or threatened ecological areas and/or areas of cultural significance that must be managed so as to maintain the attributes that make them of high conservation value. That is, HCVF cannot be converted to other types of forest cover lacking in the attributes that make these areas HCVF.

Section to be completed once SPR begins HCVF assessment

1.5 ADMINISTRATIVE CONTEXT

As a private forest enterprise located in California's Central Coast Region, management of the SPR lands are subject to a host of local, state and federal regulations. At the state and federal level, the principal regulations of greatest relevance to forest managers in this region are associated with the following statutes:

- California Z'berg – Nejedely Forest Practices Act
- Federal Clean Water Act
- Federal and State Endangered Species Act
- Archeological and Historic Preservation Act
- California Porter-Cologne Clean Water Act

Aside from the fundamental requirement that harvesting must be guided by an approved THP, NTMP or HCP the regulations specifically address management aspects such as: timber stocking levels, watercourse protection, habitat protection for "listed species", road layout and maintenance, public notification. The California forest practice regulations are arguably the most extensive and demanding set of private forestland regulations in North America.

Increasingly, federal regulations (and regulatory agencies) are a part of the administrative context of commercial forest management in the region. In particular, listings under the federal Endangered Species Act of the marbled murrelet and various species of salmonids have substantially elevated the role of the U.S. Fish and Wildlife Service and the National Marine Fisheries Service in private forestland management.

Most notable is the passage of a 1998 county ordinance that prohibits commercial timber harvesting on lands not zoned for timber production. The land base available for timber

harvesting within SPR declined following the enactment of this ordinance. Specifically several parcels that are zoned Commercial Agriculture (CA) and Special Use (SU). The ordinance reflects broader demographic trends that include the increased settlement of the county by affluent professionals that are less than accepting of commercial forestry activities in their newly adopted neighborhoods.

1.6 PRODUCTS PRODUCED

Products produced: redwood and Douglas-fir logs

1.7 CHAIN-OF-CUSTODY - TRACKING, TRACING AND IDENTIFICATION OF PRODUCTS

At the request of the certification applicant, SCS conducted a joint forest management and chain-of-custody certification evaluation of the defined forest area. Currently, 100-percent of SPR sales are sold as standing timber, thus to meet COC requirements SPR only needs to provide their FSC registration number on the sale prospectus or other sale documentation.

As is detailed in Section 10.1 of this joint FM/COC certification evaluation report, it is the conclusion of the SCS evaluation team that the chain-of-custody procedures meet the FSC Principles of Chain-of-Custody. Accordingly, award of CoC certification for selling standing timber as “FSC Certified” is warranted.

1.8 OTHER ACTIVITIES

In addition to timber production, the SPR is used for education, applied research, organic agriculture, and livestock grazing. Impact of these activities on the forest management enterprise is deemed to be minimal. Livestock damage to sensitive riparian areas is the largest potential impact, however, SPR is quite active at erecting and maintaining fences to minimize this impact.

2.0 THE CERTIFICATION ASSESSMENT PROCESS

2.1 ASSESSMENT DATES

Certification Audit: September 2-4, 2003

2.2 ASSESSMENT TEAM

Dr. Robert J. Hrubes, Team Leader: Robert J. Hrubes, Ph.D., is Senior-Vice President, with principal responsibility for leading the company's natural resource management and chain-of-custody programs. He has been employed at SCS since February, 2000. Dr. Hrubes is a registered professional forester and resource economist with over 27 years of professional experience in both the private and public sectors. Prior to joining SCS, he was managing principal of Natural Resource Associates, a Northern California-based forestry and resource economics consulting firm. In 1991, SCS first engaged Dr. Hrubes' consulting services to design and implement its forest certification program. Dr. Hrubes is an

internationally recognized expert in natural resources management and environmental certification. He has led over 25 certification evaluation projects throughout North America, New Zealand, Australia, Sweden, and Japan. He earned the following degrees:

Ph.D., Wildland Resource Sciences, University of California at Berkeley

M.A., Economics, UC Berkeley

M.S., Resource Systems Management, University of Michigan

B.S., Forest Management and Outdoor Recreation Management, Iowa State University.

Dave Wager, Forest Ecologist: Mr. Wager has served as the Director of Forest Management Certification since September 2000 and is fully conversant in FSC Certification procedures and practices. Mr. Wager has expertise in business and forest ecology (B.S. business, Skidmore College; M.S. Forest Resources, Utah State University) and utilizes both in his position with SCS. He oversees the day-to-day operations of SCS' Forest Management Certification and conducts Forest Management and Chain-of-Custody evaluations throughout the world. Mr. Wager recently led forest management certification evaluations of several Indian reservations in the Northern Rocky Mountains, Potlatch's Hybrid Poplar Plantation in Oregon, Perak Integrated Timber Complex in Malaysia. As Director, Mr. Wager oversees first-time certification evaluations, annual audits, and contract renewal certifications on approximately 50 active clients. While studying forest ecology at Utah State University, Mr. Wager was awarded a NASA Graduate Student Research Fellowship to develop dendrochronological techniques to assess Douglas-fir growth reduction in Utah's Central Wasatch Mountains.

2.3 ASSESSMENT PROCESS

Scoping for the assessment took place via phone conversations and correspondence between SPR Director Dr. Walter Mark and SCS. Formal initiation of the assessment process began by a detailed request for information from SCS, which SPR responded to during August, 2003. Notification of the assessment and stakeholder consultation began July 18, 2003.

The field portion of the evaluation took place between September 2-4, 2003 and included a variety of sites designed to illustrate a cross-section of stand types and treatments, focusing on harvests conducted within the last several years.

The field audit agenda/itinerary was:

Day 1:

A.M.

Office Interviews and Document Review

- *General Background (Staff resources, land history, management philosophy, infrastructure)*
- *Management Agreement with Big Creek Lumber Company*
- *Sustained yield*
- *Timber sales*
- *Research and monitoring (CFI, Pitch canker, paired watershed)*
- *Recreation and public events*

- *Regulatory compliance*
- *Sensitive species*
- *Chemical pesticides*

P.M.

Casa Verde – office infrastructure

- *File maintenance (accident reports, personnel files)*
- *GIS and CFI data*

Valencia Property

- *Roads, skid trails, and landings*
- *Boundary markings*
- *Heritage trees*
- *WLPZ- Class I (threatened and impaired), II, and III*
- *Invasive exotic species (French broom)*
- *Skyline cable yarding*
- *Hardwood group selection with Douglas-fir underplanting*
- *CFI plots*

Day 2

Little Creek Unit

- *Roads, skid trails, and landings*
- *North Fork Flume station- paired watershed assessment*
- *WLPZ- Class I (threatened and impaired), II, and III*
- *Historic Boy Scout camp*
- *Tranquility Flat- large tree management area*
- *CFI plots*
- *General Smith Flat- Type II Old Growth Stand*
- *Monterey Pine Research plots*
- *U-pick apple orchard*
- *Archibald Tract- next THP*

Day 3

- *Synthesis and scoring*
- *Presentation and exit interview*

2.3.2 Justification for selection of items and places inspected

The field itinerary was expressly laid out so as to provide the audit team with a solid exposure to the breadth and variety of forest conditions and management activities undertaken the SPR. The team traveled to all of the management units and properties of the SPR. In selecting field sites to inspect, the team endeavored to examine recent and older harvests, experimental sites, and special management zones. The evaluation team was

satisfied that the on-site field inspections of SPR's forest management operations were sufficient in scope and intensity for reaching a certification decision.

2.4 STAKEHOLDER CONSULTATION

2.4.1 Summary of Legal and Customary Use-rights

According to the *Draft Management Plan of SPR* (2003), there are five lease agreements in existence on the SPR:

- CDF Fire Station
- Boy Scout Camp
- Organic Fields
- Cow grassland
- Timber rights on Spafford lands

All lease agreements are renewable provided the terms are followed. Additionally, there are several access and utility easements across Swanton Pacific and numerous easements across Valencia Creek property. There is also a Wetlands Reserve Program (WRP) conservation easement on 20.4 acres of the Scotts Creek floodplain.

2.4.2 Identification of Stakeholders Influenced by the Enterprise and Description of Consultation

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

- 1) To solicit input from affected parties as to the strengths and weaknesses of SPR's management and the nature of the interaction between the company and the surrounding communities.
- 2) To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests.

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

- Swanton Pacific Ranch and Cal Poly University staff
- Contractors
- Adjacent property owners
- Members of the Pacific Coast FSC Working Group
- Local and regionally-based environmental organizations and conservationists
- Purchasers of logs harvested on SPR forestlands
- Local, State and Federal regulatory agency personnel

The evaluation team contacted individuals and organizations within each of these stakeholder groups. In total 15 individuals or groups commented on the evaluation, either via letters, phone calls, or in-person interviews (see section 2.4.3 for a summary of their comments). A total of approximately 50 individuals or groups were sent, via email or regular mail, a public notice describing the upcoming evaluation and were offered opportunities to solicit comments (Appendix 5.4). Additionally, several stakeholders were contacted via phone during the assessment, but did not return phone calls. Names of groups and individuals that commented and were willing to allow names be listed in the report, as well as those who were contacted but did not respond, are listed in Appendix 5.5.

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

A summary of the comments of major perspectives and concerns expressed by the stakeholders that were consulted during the course of this evaluation include:

Regulatory Agencies

The regulatory agencies consulted confirmed that SPR has not been issued any citations. Because of the infrequency and relatively low intensity nature of harvesting on SPR, regulatory agencies did not have strong opinions about SPR forest management activities. Some comments regarding questionable success of the Queseria Creek restoration project were received. Additionally, comments were received regarding strained communication efforts between SPR and one or more of the agencies involved in the Queseria Creek restoration.

Neighboring Property Owners

SPR is seen as a positive neighbor. No negative comments were received by adjacent property owners.

Contractors

Generally speaking, contractors very much enjoy working with SPR as well as subcontractors have had positive experiences working with the harvesting contractor Big Creek Lumber Company.

Education/Internship

Faculty, students, interns, and others praise SPR for providing extremely beneficial hands-on learning opportunities. Furthermore, the learning opportunities provided by SPR are seen as highly valuable because of the scarcity of these types of hands-on learning experiences in the U.S.

Forest Products

SPR is seen as a good source of local wood in the Santa Cruz Mountains. However, as is the case with most managed forests, some individuals do not like to see any harvesting so close to large population centers.

Environmental Groups

The majority of environmental groups that were contacted about management of the SPR did not respond to either email or phone call solicitations for comments, which is typical for small forest management operations. Very favorable comments regarding SPR's management were received from the one Environmental group that responded.

2.5 GUIDELINES/STANDARDS EMPLOYED

As the applicant forest property is located in California, the certification evaluation that is the subject of this report was conducted against the duly-endorsed *FSC Pacific Coast Regional Standard*. The standard is available at the FSC-US web site, www.fscstandards.org, or is available, upon request, from Scientific Certification Systems.

2.6 SCORING PROCESS

Consistent with SCS Forest Conservation Program evaluation protocols, for scoring purposes the team collectively assigned weights of relative importance to the Criteria within each of the ten Principles. Scores were assigned to each Criterion at the completion of the field phase and importance-weighted means (average scores) were calculated for each Principle. Scoring takes place on a 100-point scale, using a consensus process amongst all members of the evaluation team. Scores less than 80 points connote performance in which there is discernible non-conformance to the breadth of a Criterion. For any Criterion for which the team assigns a score below 80 points, the team is required to specify one or more Corrective Action Requests (CARs), also known as "conditions." If the weighted average score of any Principle is less than 80, certification cannot be awarded and, instead, the evaluation team must stipulate one or more Major Corrective Action Requests (Major CARs), also known as "pre-conditions." The evaluation team also retains the option to specify "discretionary CARs" even when the score for the pertinent Criterion is above 80 points. This may occur when, overall, the Criterion was highly scored but there are issues within the scope of a Criterion where important improvements are, in the judgment of the team, necessary even though these deficiencies are not severe enough to move the score below 80 for the totality of the Criterion. For certification to be awarded, the importance-weighted average score for each of the 10 FSC Principles must be 80 points or higher.

Interpretations of Preconditions (Major CARs), CARs and Recommendations

Preconditions/Major CARs: These are corrective actions that must be resolved or closed out prior to award of the certificate. These arise when the importance-weighted average score for a Principle is less than 80 points or where there is observed non-compliance with a "pre-emptive" indicator (e.g., use of GMOs is a "fatal flaw" that precludes award of certification regardless of the strength of the overall management program).

CARs: Corrective actions must be closed out within a specified time period of award of the certificate. Certification is contingent on the certified operations response to the CAR within the stipulated time frame.

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

3.0 RESULTS, CONCLUSIONS AND RECOMMENDATIONS

Table 3.1 below, contains the evaluation team’s findings as to the strengths and weaknesses of the subject forest management operation relative to the FSC Principles of forest stewardship. The table also presents the calculated performance scores for each principle as well as the corrective action request (car) numbers related to each principle.

TABLE 3.1 NOTABLE STRENGTHS AND WEAKNESSES OF THE FOREST MANAGEMENT ENTERPRISE RELATIVE TO THE P&C

Principle/Sub ject Area	Strengths Relative to the Standard	Weaknesses Relative to the Standard	Performance Score and CAR/REC #s
P1: FSC Commitment and Legal Compliance	<ul style="list-style-type: none"> Managers and foresters are well-informed regarding laws and regulations. Operations have a track record of being in compliance with federal, state, and county regulations, e.g., THP and NTMPs are carefully prepared and followed- SPR has not received a single violation. SPR's practices frequently exceed CDF and other regulatory guidelines for roads and water quality, e.g., buffers larger than minimum, out sloped roads with rolling dips. SPR staff participate in holistic training, which mirrors the three chambers of the FSC 	<ul style="list-style-type: none"> Strained relationships between SPR and one or more regulatory agencies resulted from the complex bureaucratic process of the Queseria Creek restoration project. The 600 acre Valencia property is separate from the SPR and as a result receives a minimum amount of vigilance for unauthorized activities. Logging equipment was vandalized during a recent timber sale on the Valencia property. Staff did not have a high-level of familiarity with the Pacific Coast Standard. (Recommendation 2003.1) 	<p>89</p> <p>Recommendation 2003.1</p>
P2: Tenure & Use Rights & Responsibilities	<ul style="list-style-type: none"> The legal rights of ownership of the SPR are clearly and unquestionably established. Land boundaries are clearly identified on the ground. Management plan and supporting documents clearly describe Long-term use rights, e.g., Boy Scout camp, of the SPR property. SPR managers successfully used an informal dispute resolution process in dealing with parties concerned about roads on the Valencia property. 	<ul style="list-style-type: none"> Forest is typically closed to the general public. SPR does not have a formal dispute resolution policy. SPR could improve relations with community stakeholders, and potentially resolve disputes in the early stages, through a transparent public planning process. 	<p><u>92</u></p>
P3: Indigenous Peoples' Rights	<ul style="list-style-type: none"> Tribes are notified of timber sales and invited to comment, although none of the notifications to-date have resulted in any comments or discussions. A GIS model, developed by Cal Poly, was applied to SPR to predict, based on landscape features, where arch sites are likely to occur. Two SPR staff members have completed certified archeological training courses. Arch sites that have been identified are maintained in a confidential section of the GIS. 	<ul style="list-style-type: none"> Less than 5% of the SPR has been sampled for archeological sites. Because there has been little interest from Tribes- there is no opportunity for SPR to demonstrate cooperation with Tribe. 	<p><u>88</u></p>

<p>P4: Community Relations & Workers' Rights</p>	<ul style="list-style-type: none"> ▪ Underlying philosophy behind SPR is to provide living and learning experiences on a working forest and commercial ranch. As a result, SPR provides numerous and valuable opportunities for Cal Poly students. ▪ Employees and contractors receive wages that are commensurate with prevailing local wages and have insurance coverage and other benefits. ▪ Resident staff, interns, and the many visitors to SPR provide economic benefits to the small local community of Davenport. ▪ SPR provides valuable work to local contractors through the management contract with Big Creek Lumber Company. In last 15 years, there have been 6 sales on SPR and 5 were purchased by Big Creek. ▪ SPR has a safety manual for ranch interns and employees. ▪ Adjacent landowners, tribes, and other affected parties are notified of upcoming timber sales through the THP process. Historical and cultural sites are identified, mapped, and protected. ▪ Feedback on SPR activities is sought, in part, through the numerous educational and community services that SPR is involved with. ▪ SPR has shared their facilities and time with environmental NGO's (Sierra Club, Save the Redwoods, and others) and as a result was able to communicate their activities to these groups as well as receive feedback ▪ Well-documented systems for dealing with complaints exist through the THP and NTMP processes. 	<ul style="list-style-type: none"> ▪ SPR does not have a designated staff person to serve as health and safety coordinator, raise safety awareness, and develop accident preventative programs (Rec. 2003.2). The ranch does work under the auspices of the Cal Poly Foundation and their risk and safety officer as well as the Cal Poly State University Risk Management Officer and Environmental Health and Safety Manager. ▪ SPR does not conduct any formal social impact assessments or monitoring, e.g., changes in the number of jobs from changes in ranch activities. (Rec. 2003.3) ▪ SPR does not have a formal written dispute resolution policy. 	<p style="text-align: center;"><u>88</u></p> <p>Recommendation 2003.2 Recommendation 2003.3</p>
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<p>P5: Benefits from the Forest</p>	<ul style="list-style-type: none"> ▪ SPR is well positioned financially due to its multiple sources of revenue including timber receipts, agriculture leases, research grants, and the AI Smith Agriculture Endowment. ▪ SPR management reinvests in many aspects of the local community- e.g., education, road and infrastructure maintenance, support of local businesses. ▪ Five of the six past timber sales on SPR were purchased by Big Creek Lumber Company- the only local sawmill. ▪ SPR has used a portable sawmill for utilization of <i>Pinus radiata</i>. ▪ Felling, skidding/yarding, bucking, sorting, and handling are carried out in a way that maximizes volume and value- for example cable harvesting is frequently used and conducted with minimal damage. ▪ Lop and scatter is predominantly used- thus maximizing retention of biomass on the forest floor. ▪ Economic activities on SPR, other than timber harvesting, include education, U-pick orchards, a historic railroad attraction, Christmas trees, agricultural and grazing leases. ▪ Harvesting activities maintain continuous forest cover across the forested landscapes of SPR and as such ensure and enhance the value of forest services. ▪ SPR's allowable harvest is based on clearly documented projections that use growth and regeneration data, site index models, and the soil classification. ▪ SPR has a very robust inventory system, a CFI set on a 500 foot grid that is measured on 10-year cycles. 	<ul style="list-style-type: none"> ▪ SPR only sells standing timber- and has not pursued adding value with the sale of delivered logs. ▪ Markets for less-used species, e.g., tanoak, have not been sought. ▪ SPR has made only limited use of its portable sawmill. 	<p><u>92</u></p>
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<p>P6: Environmental Impact</p>	<ul style="list-style-type: none"> ▪ The NTMP for the Valencia Property and all THP's include a detailed environmental impact assessment (EIA). ▪ A paired watershed study of the North and South forks of Little Creek is currently underway. The objective of the study is to document watershed conditions before and after harvest. ▪ Necessary mitigation measures are implemented following impact assessments. ▪ SPR staff work with California Natural Diversity Database, California Native Plant Society, and other specialists to identify rare, threatened, and endangered flora and fauna on the property. ▪ Safeguards to protect rare, threatened, and endangered species, such as canopy retention, snag retention, sediment controls, are implemented regularly. ▪ SPR is allowing for and moving portions of the forest, e.g., Tranquility Flats and General Smith Stand, to the range and distribution of age classes of trees that would result from natural processes inherent to the site. ▪ SPR's use of selection silviculture generates stand conditions that are similar to those produced by disturbance regimes, e.g., small forest gaps from windthrow, typical of the Santa Cruz Mountains. ▪ Lop and scatter is predominantly used- thus maximizing retention of biomass on the forest floor. ▪ Most hardwood stands are retained for wildlife and diversity purposes. ▪ SPR is contributing to the efforts to protect native Monterey pine ecosystems through various pitch canker resistance studies. ▪ Critical salmonid habitat on the SPR has been identified and is being protected. ▪ Logging costs on the SPR are 15% higher than other operations in the area because roads are built to a higher standard, volume per acre removed is less than the norm for the region, and skyline cables are often used. ▪ Consistent and effective water barring of skid trails. ▪ Roads are well planned and constructed (rocked, outsloped, with rolling dips), well maintained, and surveyed annually. ▪ Herbicides are only used for the control of invasive exotic species such as French broom. ▪ No chemicals on the FSC prohibited list are being used. ▪ Forest managers employ silvicultural systems and strategies for controlling pests and/or unwanted vegetation that result in the least adverse environmental impact. ▪ Exotic species are not used on SPR. 	<ul style="list-style-type: none"> ▪ French broom, an exotic invasive, was observed to be out competing native plants in areas of the Valencia property. There is no written action plan and priority list for treating invasive exotic plant species. (Rec. 2003.6) ▪ SPR has not developed and memorialized a formal policy on old growth/heritage trees, though it was clear to the audit team that existing type II and type III old growth stands are currently being protected. (Recommendation 2003.4) ▪ Policies for retention of snags and cavity trees could be elaborated. If available through the CFI, numbers and size classes of snags per acre should be estimated and snag recruitment, if needed, should be considered. Note the Pacific Coast Standard suggests 3-10 snags per acre- averaged over 10 acres. (Rec. 2003.5) ▪ SPR has not completed a formal analysis and developed a policy on what representative samples of existing ecosystems within SPR should be protected. 	<p style="text-align: center;"><u>92</u></p> <p>Recommendation 2003.4</p> <p>Recommendation 2003.5</p> <p>Recommendation 2003.6</p>
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P7: Management Plan	<ul style="list-style-type: none"> Management plan for Swanton Ranch provides an excellent history of the ownership. The combination of the Swanton Ranch Management Plan, Timber Harvest Plans (THP's), the NTMP for the Valencia property, and other related documents covers the breadth of the elements listed under P&C 7.1 (a-i). Current management plans are very comprehensive and based on robust resource inventories and assessments. GIS is actively used, available on site, and frequently updated. Growth and yield data is incorporated into harvest calculations of plan revisions. SPR staff and interns are provided substantial training and oversight. Effective implementation of the management plan is facilitated by the management contract with Big Creek Lumber Company and the well-trained experienced foresters that this arrangement brings to SPR. 	<ul style="list-style-type: none"> The management plan lacks a description of socio-economic conditions and a profile of adjacent lands (P&C 7.1b). Much of the work of the SPR plan revision is being completed by an outside consultant, thus implementation of the plan might not be as effective as it would be if completed by SPR staff. Although numerous research and monitoring activities are conducted on SPR, there is no formal methodology for incorporating results into the management plan. Swanton Pacific Ranch has not made publicly available a summary of the management plan that covers P&C 7.1 (a-i). 	<p style="text-align: center;"><u>93</u> CAR.2003.1</p>
P8: Monitoring & Assessment	<ul style="list-style-type: none"> Implementation of the management plan is periodically monitored through numerous mechanisms, e.g., CFI system, water quality monitoring, stream channel surveys, road monitoring, and various research projects. A robust CFI is in place and is re-measured every 10 years. The level of annual monitoring and research activities are considered each year as part of the Budget Assumptions/Work-Plan. Detailed monitoring is undertaken at sites of special significance, e.g., threatened and impaired streams. Monitoring and research on the SPR includes, yield of all forest products harvested, growth rates, regeneration and condition of the forest, composition and observed changes in the flora and fauna, environmental impacts of harvesting and other operations, and costs, productivity, and efficiency of forest management. Current and past research on the SPR has covered numerous topics and provided useful information for forest management. Studies include: herbicide application methods, hydrological research on critical watersheds, Light Detection and Ranging (LIDAR) measurements of stream channel changes, water quality and aquatic habitat relative to timber harvests on Little Creek, stream restoration effectiveness, Pitch Canker Resistance, Sudden Oak Death. Currently SPR is only selling standing timber and is prepared to meet CoC requirements for selling standing timber. A great deal of information concerning the SPR has been made available to the public through meetings, publications, NTMP of the Valencia property, and other mechanisms. 	<ul style="list-style-type: none"> Monitoring efforts could be improved with regard to the social impact of harvesting and other operations. (Rec. 2003.7) SPR does not have a procedures in-place for ensuring COC if and when they decide to sell their own products. Other than the CFI, there does not appear to be a formal system for identifying and prioritizing monitoring needs. There is not comprehensive database of research activities that take place on the SPR (Rec. 2003.8) A public summary of the results of monitoring efforts is not available. 	<p style="text-align: center;"><u>89</u> CAR.2003.2 Recommendation 2003.7 Recommendation 2003.8</p>

P9: Maintenance of High Conservation Value Forest	▪	▪	—
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3.2 CERTIFICATION RECOMMENDATION¹ AND JUSTIFICATION

Based upon the information gathered and observations made, and as is detailed in this report, it is the collective judgment of the audit team that management of Swanton Pacific Ranch is not presently in conformance with the Pacific Coast Regional Standard, particularly Principle 9 (High Conservation Value Forests). As such, the team has specified one Major Corrective Action Requests that would need to be cleared prior to award of certification.

Peer Reviewers

The following peer reviewer will review the draft of this evaluation report:

The evaluation team carefully considered the comments provided by the peer reviewers and made changes, as deemed appropriate, in response to those comments. The peer review comments are the personal professional opinions of the experts that submit comments and do not constitute the opinions or positions of the organizations within whom they are employed.

3.4 PROPOSED CARS ATTACHED TO CERTIFICATION

Major CAR- Pre-Condition

Background/Justification: Management of Swanton Pacific Ranch is not in compliance with Principle 9, High Conservation Value Forest (HCVF)	
Major CAR.2003.1	<p>Prior to the award of certification, Swanton Pacific Ranch must <i>demonstrate substantive progress</i> in complying with the High Conservation Value Forests (HCVFs) requirements, as set forth in FSC Principle 9. Substantive progress will be demonstrated by providing SCS with documentation of:</p> <ul style="list-style-type: none">• A <i>timeline</i>, that conforms to CAR 2003.3 and that, in total, does not exceed one year from award of certification, for the steps that Swanton Pacific Ranch will take to:<ul style="list-style-type: none">○ define those attributes that merit designation as high conservation value○ determine the presence of HCVFs on the Swanton Pacific Ranch, including some focused consultation with outside stakeholders, Swanton Pacific Ranch staff, and Cal Poly personnel○ develop appropriate guidelines for the management of

¹ Under SCS/FSC protocols, audit teams do not render formal certification decisions; that responsibility rests with the SCS Certification Committee. Rather, the audit team formulates a recommendation that is centrally considered by the SCS Certification Committee.

	<p>identified areas of HCVF</p> <ul style="list-style-type: none"> ○ develop monitoring protocols designed to assess the effectiveness of the HCVF management guidelines • <i>A written protocol</i> for how forest managers will screen Swanton Pacific Ranch lands for areas of potential high conservation value, giving appropriate consideration to Types II and III old growth forests (Pacific Coast Standard P&C 6.3), T&E species (P&C 6.2), and representative examples of existing ecosystems that would not already be reserved within the region (P&C 6.4). • <i>Initiation of consultation</i> with stakeholders (such as Swanton Pacific Ranch field staff, adjacent property owners, Save the Redwoods League, Cal Poly faculty members, county, state, and federal resource agencies) seeking their input as to appropriate definitions of high conservation values pertinent to forest in the Santa Cruz mountains as well as the presence of areas within the Swanton Pacific Ranch.
Reference	FSC Principle 9 – Pacific Coast Standard V. 7.9
Deadline	None: <i>prior to award of certification</i>

Corrective Action Requests

Background/Justification: Swanton Pacific Ranch has not made publicly available a summary of the management plan- as required in P&C 7.4.	
CAR.2003.1	By the time of the first annual audit after award of certification, Swanton Pacific Ranch must <i>make publicly available</i> a summary of the main elements of the management plan including those listed in P&C 7.1. Information deemed proprietary or confidential from a business standpoint does not need to be included in the public summary.
Reference	FSC P&C 7.4 – Pacific Coast Standard V. 7.9
Deadline	1 st annual audit (approx. 12 months from award of certification)

Background/Justification: Swanton Pacific Ranch has not met the intent of Criterion 8.5, which requires making available an up-to-date summary of monitoring.	
CAR.2003.2	<p>By the time of the first annual audit after award of certification, Swanton Pacific Ranch must <i>make publicly available</i> a summary of the results of periodic monitoring, including:</p> <ul style="list-style-type: none"> • Yield of forest products harvested • Growth rates, regeneration and conditions of the forest • Composition and observed changes in flora and fauna • Environmental and social impacts of harvesting and other operations • Costs, productivity, and efficiency of forest management.

	Information deemed proprietary or confidential from a business standpoint does not need to be included in the public summary.
Reference	FSC P&C 8.5 – Pacific Coast Standard V. 7.9
Deadline	1 st annual audit (approx. 12 months from award of certification)

Background/Justification: Management of Swanton Pacific Ranch is not in compliance with Principle 9, High Conservation Value Forest (HCVF)	
CAR.2003.3	<p>Within one year of award of certification, Swanton Pacific Ranch must <i>complete the assessment for/identification of HCVFs</i>, building upon the work initiated in response to Major CAR 2003.1 including</p> <ul style="list-style-type: none"> ▪ mapping of all HCVF areas identified within its forest estate. ▪ augmenting the management plan <i>with the specific measures</i> (policies, prescriptions, practices) that are being or will be employed to maintain the salient conservation values for all areas of the ownership identified or to be identified as HCVF. These management measures must be included in the public summary of the management plan. ▪ developing and formally adopting procedures for periodic monitoring of the effectiveness of measures taken to maintain the salient conservation values within areas identified as HCVF.
Reference	FSC P&C 9.1-9.4 – Pacific Coast Standard V. 7.9
Deadline	1 st annual audit (approx. 12 months from award of certification)

4.0 AUDITS

If certification is awarded, the first surveillance audit will be conducted during the 200__ operating season.

5.0 PUBLIC INFORMATION ABOUT THE FOREST MANAGEMENT PLAN AND MONITORING

A public summary of the management plan for the Swanton Pacific Ranch, is available on their website: www.spr.org.

SECTION B. DETAILED RESULTS OF THE FULL EVALUATION

SECTION 1.0 DETAILED OBSERVATIONS & RESULTS

The findings and observations of the evaluation team are presented in this section, structured according to the 9 applicable FSC Principles. To follow are brief descriptions of each Principle and the team's findings and judgments, disaggregated to the Criteria within each Principle.

SECTION 1.1 PRINCIPLE #1: COMPLIANCE WITH LAWS & FSC PRINCIPLES

This FSC Principle is elaborated through a set of 6 Criteria that focus on issues such as conformance to all applicable national and local laws and regulations, payment of legally prescribed fees, taxes and royalties, protections against illegal harvesting and other unauthorized activities, and demonstrating a long-term commitment to adhere to the FSC Principles & Criteria.

- 1.1 Forest management shall respect all national & local laws and administrative requirements**
- 1.2 All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid**
- 1.3 In signatory countries, the provisions of all the binding international agreements such as CITES, ILO conventions, ITTA, and Convention on Biological Diversity, shall be respected**
- 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.**
- 1.5 Forest management areas should be protected from illegal harvesting, settlement and other unauthorised activities**
- 1.6 Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria**

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
C1.1 Forest Management shall respect all national and local laws and administrative requirements. Score: 92	<ul style="list-style-type: none"> Managers and foresters are well informed regarding laws and regulations. Operations have a track record of being in compliance with federal, state, and county regulations, e.g., THP and NTMPs are carefully prepared and followed- SPR has not received a single violation. SPR's practices frequently exceed CDF and other regulatory guidelines for roads and water quality, e.g., buffers larger than minimum, out sloped roads with rolling dips. 	<ul style="list-style-type: none"> Strained relationships between SPR and one or more regulatory agencies resulted from the complex bureaucratic process of the Queseria Creek restoration project.
Findings: Based upon our interviews with company personnel, observations of field operations and consultations with appropriate agency personnel, the audit team concludes that compliance with this Criterion, as elaborated in the Pacific Coast Standard, is outstanding.		
C1.2 All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid. Score: 93	<ul style="list-style-type: none"> Yield taxes and other fees related to forest management, are paid in a timely manner and in accordance with legal requirements. 	No weaknesses observed
Findings: The assessment team did not observe any conditions that suggested problems with payment of applicable fees, royalties, taxes, or other charges. Accordingly, the team has assigned a score that connotes "outstanding conformance" with this Criterion, as elaborated by the Pacific Coast Standard.		
C1.3 In signatory countries, the provisions of all the binding international agreements such as CITIES, ILO conventions, ITTA, and Convention on Biological Diversity, shall be respected.	<ul style="list-style-type: none"> No activities were observed that suggested a lack of compliance with binding international agreements. 	<ul style="list-style-type: none"> Forest managers lack an in-depth understanding of international agreements such as CITES, ILO Conventions, ITTA, and the Convention on Biological Diversity.

Score: 85		
Findings: It is the team's opinion that the international agreements referenced in Principle 1.3 are not materially relevant to the management of the SPR. Ideally forest managers would be familiar with these agreements, but the team does not expect that this would be a high management priority given other demands on staff time. Accordingly, the team has assigned a score that connotes clear compliance with this Criterion, as elaborated by the Pacific Coast Standard		
C1.4 Conflicts between laws, regulations and the FSC P&C shall be evaluated for the purposes of certification on a case by case basis.	NA	NA
Score: NA		
Findings: This Criterion was not scored by the audit team, as it is primarily an advisory Criterion of relevance after award of certification. In the judgment of the audit team, there is a very low likelihood of conflicts arising between laws/regulations and the FSC P&C.		
C1.5 Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.	<ul style="list-style-type: none"> ▪ Most of the lands inspected appeared free of trespass, illegal dumping (for the most part), and other abusive uses. ▪ The majority of roads on the SPR are gated. ▪ Gates and boundaries were generally well maintained. ▪ SPR staff live on-site, within the 3000 acre ranch, and thus have increased vigilance over the property and can respond quickly to unauthorized activities. 	
Score: 90	<ul style="list-style-type: none"> ▪ The 600 acre Valencia property is separate from the SPR and as a result receives a minimum amount of vigilance for unauthorized activities. Logging equipment was vandalized during a recent timber sale on the Valencia property. ▪ There is a paucity of signage (e.g., rules and regulations for property, timber sale postings) on the property. 	

Findings: As a result of SPR's on-site presence (resident staff and interns) and road gating practices, SPR does an excellent job of minimizing unauthorized activities on the Swanton property. The Valencia property is well gated, however, it does not receive the same level of oversight and inspection as the Swanton property. SPR may want to consider mechanisms to increase their vigilance over the Valencia property either through more frequent visits by staff and interns or possibly through local volunteer or user groups. Overall, the team has assigned a score that connotes clear to "outstanding conformance" with this Criterion, as elaborated by the Pacific Coast Standard.

<p>C1.6 Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</p>	<ul style="list-style-type: none"> ▪ SPR staff participate in holistic training, which mirrors the three chambers of the FSC ▪ On-the-ground results appear very consistent with the FSC Principles and Criteria. ▪ One of the reasons why SPR is seeking certification is to teach students about FSC. 	<ul style="list-style-type: none"> ▪ The website does not contain a public statement of commitment to managing in accordance with the P&C. ▪ Staff did not have a high-level of familiarity with the Pacific Coast Standard. (Recommendation 2003.1)
<p>Score: 86</p>		

Findings: In addition to the strengths listed above, SPR is one of the first University forestry programs that funded the full cost of certification from its own internal funding sources, as opposed to waiting for outside grant funding. Furthermore, SPR is also one of the few Universities that is certified only by FSC, as opposed to SFI and FSC certification. Thus, it is the audit team's conclusion that performance is clearly in conformance with this Criterion. as elaborated by the Pacific Coast Standard.

Overall Findings and Conclusions:

As indicated by the performance scores awarded to the 6 Criteria that comprise this Principle, the SCS audit team concludes that the SPR forest management operations are conducted in strong compliance with applicable local, state and federal laws and regulations.

Upon award of certification, SPR is prepared to make a public statement of commitment to the FSC Principles & Criteria, as required by Criterion 1.6. Over the breadth of this Principle, the scores assigned indicate "clear conformance".

Corrective Action Requests and/or Recommendations:

No CARs are stipulated with respect to this FSC Principle.

Recommendation 2003.1: SPR staff should seek ways to increase their familiarity with the FSC Pacific Coast Standard.

Importance Weighted Aggregate Score for Principle 1:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 6 Criteria in this Principle. Under SCS' accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights

were designed to reflect the regional context in which the subject forest management unit is located:

FSC Principle #1: <i>Compliance with Laws and FSC Principles</i>	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
1.1	0.324	92	89
1.2	0.114	93	
1.3	0.138	85	
1.4	NA	NA	
1.5	0.149	90	
1.6	0.275	86	

Applying the normalized weights of relative importance to the 5 assigned performance scores, and rounding to the nearest integer, leads to a weighted average score for the Principle of:

89

Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

SECTION 1.2 PRINCIPLE #2: TENURE AND USE RIGHTS/RESPONSIBILITIES

This FSC Principle, detailed through 3 Criteria, focuses on the long-term tenure and use rights to the land that is undergoing the certification evaluation. Forest managers seeking FSC-endorsed certification must establish clear and legal ownership or right to manage the defined forest area that is being evaluated. Customary use rights, if clearly demonstrated, must be appropriately honored.

- 2.1 Clear evidence of long-term tenure and forest use rights to the land (e.g. land title, customary rights, or lease agreements) shall be demonstrated**
- 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.**
- 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.**

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
C2.1 Clear evidence of long-term tenure and forest use rights to the land (e.g. land title, customary rights, or lease agreements) shall be demonstrated. Score: 91	<ul style="list-style-type: none"> ▪ The legal rights of ownership of the SPR are clearly and unquestionably established. ▪ Land boundaries are clearly identified on the ground. ▪ Management plan and supporting documents clearly describe Long-term use rights, e.g., Boy Scout camp, of the SPR property. 	No weaknesses noted
Findings: With respect to the most fundamental aspect of this Criterion, establishing the legal right to manage the land area for which certification is sought, the audit team is fully satisfied that such legal right has long been fully established. Accordingly, the team has assigned a score that connotes “outstanding conformance” with this Criterion, as elaborated by the Pacific Coast Standard.		
C2.2 Local Communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights Score: 85	<ul style="list-style-type: none"> ▪ Rights of the following leasors are recognised through legal agreements: <ul style="list-style-type: none"> • CDF Fire Station • Boy Scout Camp • Organic Fields • Cow grassland • Timber rights on Spafford lands ▪ All the above lease agreements are renewable provided the terms are followed. ▪ SPR staff have a pro-active philosophy of resolving issues before they become too difficult to informally resolve. 	<ul style="list-style-type: none"> ▪ Forest is typically closed to the general public. ▪ SPR staff have only engaged in limited consultation regarding potential Native American cultural sites (see Principle 3.3 for more a more detailed discussion).
Findings: Based on the above strengths and weaknesses the audit team deemed that SPR is clearly in conformance with this Criterion. A more open-use policy or higher level of stakeholder consultation would certainly improve performance relative to this Criterion Accordingly, the team has assigned a score that connotes “clear conformance” with this Criterion, as elaborated by the Pacific Coast Standard		
C2.3 Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. Score: 90	<ul style="list-style-type: none"> ▪ SPR staff notify all adjacent landowners of upcoming timber sales. ▪ SPR managers successfully used an informal dispute resolution process in dealing with parties concerned about roads on the Valencia property. 	<ul style="list-style-type: none"> ▪ SPR does not have a formal dispute resolution policy. ▪ SPR could improve relations with community stakeholders, and potentially resolve disputes in the early stages, through a transparent public planning process.

Findings: Based on the above strengths and weaknesses the audit team deems that there is an outstanding level of conformance with this Criterion, as elaborated by the Pacific Coast Standard.

Overall Findings and Conclusions:

Generally, SPR demonstrates clear compliance with this Principle. Summarizing from above the most important attributes of SPR's management related to this Principle include the clearly established ownership of the property, notification of activities to adjacent landowners, clear policies on lease agreements that are readily available to interested parties, and the informal dispute resolution efforts of SPR managers.

Corrective Action Requests and Recommendations:

No CARs are stipulated with respect to this FSC Principle.

Importance Weighted Aggregate Score for Principle 2:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 3 Criteria in this Principle. Under SCS' accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located

FSC Principle #2 <i>Tenure and Use Rights and Responsibilities</i>	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
2.1	0.539	95	92
2.2	0.164	85	
2.3	0.297	90	
			92

Applying the normalized weights of relative importance to the 3 assigned performance scores, and rounding to the nearest integer, leads to a weighted average score for the Principle of:

92

Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

SECTION 1.3 PRINCIPLE #3: INDIGENOUS PEOPLES' RIGHTS

This FSC principle is concerned about the rights of indigenous peoples to own, use and manage their lands and territories. The Criteria focus on issues such as tenure rights of indigenous people, protection of cultural sites, and compensation for traditional knowledge.

- 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.**
- 3.2 Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.**
- 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.**
- 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.**

Criterion	Strengths Relative to the Standard	Weaknesses Relative to the Standard
C3.1 Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.	Not Applicable	Not Applicable
Score:		
Findings: This Criterion was deemed Non-Applicable because SPR does not in any way manage Tribal lands.		
C3.2 Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.	<ul style="list-style-type: none">▪ Tribes are notified of timber sales and invited to comment, although none of the notifications to-date have resulted in any comments or discussions.▪ A GIS model, developed by Cal Poly, was applied to SPR to predict, based on landscape features, where arch sites are likely to occur.	<ul style="list-style-type: none">▪ Less than 5% of the SPR has been sampled for archeological sites.
Score: 88		
Findings: Based on the two notable strengths listed above, the team assigned a score that connotes “clear conformance” with this Criterion, as elaborated by the Pacific Coast Standard.		
C3.3 Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified.... and protected...	<ul style="list-style-type: none">▪ Tribes are notified of timber sales and invited to comment, although none of the notifications to-date have resulted in any comments or discussions.▪ Two SPR staff members have completed certified archeological training courses.▪ Arch sites that have been identified are maintained in a confidential section of the GIS.	<ul style="list-style-type: none">▪ Because there has been little interest from Tribes- there is no opportunity for SPR to demonstrate cooperation with Tribes.
Score: 88		
Findings: The team was impressed with the staff’s sensitivity and awareness toward identifying and protecting archeological sites. Also, the staff is open to cooperating with any Tribal members (e.g., local rancherias) that are interested in identification and protection of special sites. As a result, the audit team concludes that SPR clearly meets this Criterion. However, a more pro-active approach to communicating with interested Tribal individuals or groups (assuming there are some), would be needed to receive a higher rating. Accordingly, the team has assigned a score that connotes “clear conformance” with this Criterion, as elaborated by the		

Pacific Coast Standard.		
C3.4 Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations.	Not Applicable	Not Applicable
Score:		
Findings: Not Applicable as the SPR does not use knowledge or management techniques originating from Native Americans.		

Overall Findings and Conclusions:

The team's overall finding is that there is "clear conformance" with Principle 3 because SPR invites comments from Tribal individuals and groups and takes appropriate measures to identify and protect sites.

Corrective Action Requests and Recommendations:

No CARs are stipulated with respect to this FSC Principle.

Importance Weighted Aggregate Score for Principle 3:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 4 Criteria in this Principle. Under SCS' accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located.

FSC Principle #3 <i>Indigenous Peoples' Rights</i>	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
3.1	NA	--	88
3.2	0.50	88	
3.3	0.50	88	
3.4	NA		
			88

Applying the normalized weights to the 2 assigned performance scores, and rounding to the nearest integer, leads to a single weighted average score for this Principle of:

88

Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

SECTION 1.4 PRINCIPLE #4: COMMUNITY RELATIONS & WORKERS' RIGHTS

This FSC Principle, elaborated through 5 Criteria, addresses the effects of forest management on the well being of forest workers and local communities. The Criteria focus on issues such as: preferences for local employment, compliance with employee health and safety regulations, rights of workers to organize, completion of social impact assessments, and employee grievance resolution mechanisms. In short, this principle expresses the position that exemplary forest management must include a conscious sensitivity to the interests of the most directly impacted stakeholders: employees, contractors and local communities.

Forest management operations shall maintain or enhance the long-term social and economic well being of forest workers and local communities.

- 4.1 The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services**
- 4.2 Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families**
- 4.3 The rights of the 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)**
- 4.4 Management planning and operations shall incorporate the results of evaluations of social impact. Consultation shall be maintained with people and groups directly affected by management operations.**
- 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**

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
C4.1 The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.	<ul style="list-style-type: none">▪ Underlying philosophy behind SPR is to provide living and learning experiences on a working forest and commercial ranch. As a result, SPR provides numerous and valuable opportunities for Cal Poly students.▪ Employees and contractors receive wages that are commensurate with prevailing local wages and have insurance coverage and other benefits.▪ Resident staff, interns, and the many visitors to SPR provide economic benefits to the small local community of Davenport.▪ SPR provides valuable work to local contractors through the management contract with Big Creek Lumber Company. In last 15 years, there have been 6 sales on SPR and 5 were purchased by Big Creek.▪ SPR offers a MESA summer science camp on agriculture and natural resources.▪ SPR provides research opportunities to many scientists- see Principle 8 for more detail.	<ul style="list-style-type: none">▪ Education opportunities for non-Cal poly students could be strengthened.▪ Efforts to increase the educational capacity of SPR and/or expand its usage into other Cal Poly disciplines has been limited.
Score: 95		
Findings: Based on the many notable strengths listed above, the audit team concludes that the level of conformance with this Criterion is outstanding. Accordingly, the team has assigned a score that connotes “outstanding conformance” with this Criterion, as elaborated by the Pacific Coast Standard.		
C4.2 Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.	<ul style="list-style-type: none">▪ SPR has a safety manual for ranch interns and employees.▪ Staff are very sensitive to complying with OSHA regulations.▪ SPR management contract is with Big Creek Lumber Company, an FSC certified company, with a good record in safety compliance.	<ul style="list-style-type: none">▪ SPR does not have a designated staff person to serve as health and safety coordinator raise safety awareness and develop accident preventative programs (Rec. 2003.2).). The ranch does work under the auspices of the Cal Poly Foundation and their risk and safety officer as well as the Cal Poly State University Rick Management Officer and Environmental Health and Safety Manager. All ranch staff are certified for standard first aid and CPR.
Score: 85		

Findings: Based on the strengths and weaknesses listed above, the audit team concludes that there is an adequate level of conformance with this Criterion. A higher level of conformance could be achieved through a more pro-active health and safety program. Accordingly, the team has assigned a score that connotes “clear conformance” with this Criterion, as elaborated by the Pacific Coast Standard.

<p>C4.3 The rights of the workers to organize and voluntarily negotiate with their employers shall be guaranteed.....</p>	<ul style="list-style-type: none"> These rights are assured by California and US Law. Forest managers and contractor (Big Creek) maintain a good working relationships, and communicate and collaborate regularly. 	<ul style="list-style-type: none"> Although there are no barriers to SPR staff who wish to associate or even unionize, we did not see an explicit statement to this effect.
<p>Score: 85</p>		

Findings: Based upon the team’s observations of SPR’s performance relative to this Criterion, it is the audit team’s conclusion that SPR is “adequately to clearly” in conformance with this Criterion, as elaborated by the Pacific Coast Standard.

<p>C4.4 Management planning and operations shall incorporate the results of evaluations of social impact. Consultation shall be maintained with people and groups directly affected by management operations.</p>	<ul style="list-style-type: none"> Public meeting(s) were held as part of the NTMP process on the Valencia property. Adjacent landowners, tribes, and other affected parties are notified of upcoming timber sales through the THP process. Historical and cultural sites are identified, mapped, and protected. Feedback on SPR activities is sought, in part, through the numerous educational and community services that SPR is involved with. SPR has shared their facilities and time with environmental NGO’s (Sierra Club, Save the Redwoods, and others) and as a result was able to communicate their activities to these groups as well as receive feedback. 	<ul style="list-style-type: none"> SPR does not conduct any formal social impact assessments or monitoring, e.g., changes in the number of jobs from changes in ranch activities. (Rec. 2003.3)
<p>Score: 89</p>		

Findings: Based on the numerous strengths listed above, the audit team concludes that there is “clear conformance” with this Criterion. A higher level of conformance could be achieved if SPR began more formal measures for assessing social impacts of their operations. Accordingly, the team has assigned a score that connotes “clear conformance” with this Criterion, as elaborated by the Pacific Coast Standard.

<p>C4.5 Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation...</p>	<ul style="list-style-type: none"> Well documented systems for dealing with complaints exist through the THP and NTMP processes. SPR staff have a pro-active open style approach for working with adjacent 	<ul style="list-style-type: none"> SPR does not have a formal written dispute resolution policy. SPR does function as an arm of the Cal Poly Foundation and all personnel issues are resolved through the Human Resources
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Score: 85	property owners regarding road access and other relevant issues, as demonstrated by solving road issues with homeowners in proximity to the Valencia property.	Office.
Findings: Based upon the team's observations of SPR's performance relative to this Criterion, it is the audit team's conclusion that SPR is "adequately to clearly" in conformance with this Criterion.		

Overall Findings and Conclusions:

Principle 4 focuses on community relations and worker's rights and the team concludes that SPR does an exemplary job at being a "good neighbor" and employer. In addition, the educational and work experience opportunities provided by SPR are a valuable service to Cal Poly students. In conclusion, SPR demonstrates "clear conformance" with this Criterion.

Corrective Action Requests and Recommendations:

No CARs were specified for this Principle

Recommendation 2003.2- SPR should develop a more formal health and safety program, with a designated coordinator, to raise awareness on safety issues and promote preventative measures.

Recommendation 2003.3- SPR should develop more formal mechanisms for assessing social impacts of their activities.

Importance Weighted Aggregate Score for Principle 4:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 6 Criteria in this Principle. Under SCS' accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located

FSC Principle #4 <i>Community Relations and Worker's Rights</i>	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
4.1	0.250	95	88
4.2	0.250	85	
4.3	0.110	85	
4.4	0.220	89	
4.5	0.170	85	
			88

Applying the normalized weights to the 5 assigned performance scores, and rounding to the nearest integer, leads to a single weighted average score for this Principle of:

88

Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

SECTION 1.5 PRINCIPLE #5: BENEFITS FROM THE FOREST

This FSC Principle addresses several loosely related issues such as efficiency in the use of forest products, financial viability of the forest management operation, and diversity of environmental and social benefits from forest management. Principle 5 is elaborated through 6 Criteria. Of note, Criterion 5.6 requires that the rate of harvest not exceed levels that can be permanently sustained, perhaps one of the most focused and specific requirements found throughout the P&C. The other 5 Criteria within this principle address matters such as balancing financial objectives with full cost accounting (including environmental costs), optimal use of harvested products and local processing, minimization of waste and residual stand damage, diversification of products from the forest, and protection of forest services such as watershed functions and fisheries values.

- 5.1 Forest management should strive towards 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.**
- 5.2 Forest management and marketing operations should encourage the optimal use and local processing of the forest's diversity of products.**
- 5.3 Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.**
- 5.4 Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.**
- 5.5 Forest management operations shall recognize, maintain and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.**
- 5.6 The rate of harvest of forest products shall not exceed levels which can be permanently sustained.**

Criterion	Strengths Relative to the Standard	Weaknesses Relative to the Standard
<p>C5.1 Forest management should strive towards economic viability, while taking into account the full environmental, social, and operational costs of production.....</p> <p>Score: 95</p>	<ul style="list-style-type: none"> ▪ SPR is well positioned financially due to its multiple sources of revenue including timber receipts, agriculture leases, research grants, and the Al Smith Agriculture Endowment. ▪ Because of the multiple sources of funding, SPR is not driven by short term financial factors. ▪ Logging costs on SPR are very high for the region (15% higher than most other operations) because of the additional environmental safeguards taken. ▪ SPR management reinvests in many aspects of the local community- e.g., education, road and infrastructure maintenance, support of local businesses. 	No weaknesses noted
<p>Findings: SPR is self sufficient in funding all of its activities, with the exception of education. In addition to being primarily self sufficient, SPR is fortunate to have the Agriculture Endowment as an augment to its self generated income. Accordingly, the team has assigned a score that connotes “outstanding conformance” with this Criterion, as elaborated by the Pacific Coast Standard.</p>		
<p>C5.2 Forest management and marketing operations should encourage the optimal use and local processing of the forest’s diversity of products.</p> <p>Score: 88</p>	<ul style="list-style-type: none"> ▪ Five of the six past timber sales on SPR were purchased by Big Creek Lumber Company- the only local sawmill. ▪ SPR has used a portable sawmill for utilization of <i>Pinus radiata</i>. ▪ Landings had very little residual material left. 	<ul style="list-style-type: none"> ▪ SPR only sells standing timber- and has not pursued adding value with the sale of delivered logs. ▪ Markets for less-used species, e.g., tanoak, have not been sought.
<p>Findings: As a result of the above strengths and weaknesses the team has assigned a score that connotes “clear conformance” with this Criterion, as elaborated by the Pacific Coast Standard.</p>		
<p>C5.3 Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</p> <p>Score: 95</p>	<ul style="list-style-type: none"> ▪ Felling, skidding/yarding, bucking, sorting, and handling are carried out in a way that maximizes volume and value- for example cable harvesting is frequently used and conducted with minimal damage. ▪ Lop and scatter is predominantly used- thus maximizing retention of biomass on the forest floor. 	No weaknesses noted

Findings: SPR and their contractor, Big Creek Lumber Company, harvest timber with maximum efficiency and minimal damage. Accordingly, the team has assigned a score that connotes “outstanding conformance” with this Criterion, as elaborated by the Pacific Coast Standard.

<p>C5.4 Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</p>	<ul style="list-style-type: none"> ▪ Economic activities on SPR, other than timber harvesting, include education, U-pick orchards, a historic railroad attraction, Christmas trees, agricultural and grazing leases. ▪ Although most sales are purchased by Big Creek Lumber Company- SPR keeps their options open to sell to other markets. 	<ul style="list-style-type: none"> ▪ As described under Criterion 5.2, SPR does not sell delivered logs or market lesser used species. ▪ SPR has made only limited use of its portable sawmill.
<p>Score: 83</p>		

Findings: A very high percentage of SPR revenue is derived from redwood stumpage, and as such SPR is somewhat dependent on this single forest product. Accordingly, the team has assigned a score that connotes only marginal compliance with this Criterion, as elaborated by the Pacific Coast Standard.

<p>C5.5 Forest management operations shall recognize, maintain and, where appropriate, enhance the value of forest services....</p>	<ul style="list-style-type: none"> ▪ Harvesting activities maintain continuous forest cover across the forested landscapes of SPR and as such ensure and enhance the value of forest services. ▪ Erosion control measures, e.g., road maintenance, seeding landings, are exemplary. 	<p>No weaknesses noted.</p>
<p>Score: 95</p>		

Findings: The team has assigned a score that connotes “outstanding conformance” with this Criterion, as elaborated by the Pacific Coast Standard.

<p>C5.6 The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</p>	<ul style="list-style-type: none"> ▪ SPR’s allowable harvest is based on clearly documented projections that use growth and regeneration data, site index models, and the soil classification. ▪ SPR has a very robust inventory system, a CFI set on a 500 foot grid that is measured on 10-year cycles. ▪ Regeneration of redwood is plentiful, as is common in this forest type. ▪ SPR is moving the forest to a regulated state. 	<p>No weaknesses noted</p>
<p>Score: 92</p>		

Findings: SPR is harvesting approximately only 80% of growth, the forest inventory methods are very robust, and silvicultural practices are moving the forest to a regulated state. Accordingly, the team has assigned a score that connotes “outstanding conformance” with this Criterion, as elaborated by the Pacific Coast Standard.

Overall Findings and Conclusions:

Over the breadth of the 6 Criteria comprising this Principle, the audit team concludes that SPR's performance is outstanding. Clearly, SPR management operations encourage the efficient and responsible use of the forest's multiple products and services. As a result SPR ensures economic viability and a wide range of environmental and social benefits.

Corrective Action Requests and Recommendations:

No CARs were specified for this Principle.

Importance Weighted Aggregate Score for Principle 5:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 6 Criteria in this Principle. Under SCS' accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located

FSC Principle #5 <i>Benefits from the Forest</i>	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
5.1	0.213	95	91.9
5.2	0.108	88	
5.3	0.068	95	
5.4	0.112	83	
5.5	0.196	95	
5.6	0.303	92	

Applying the normalized weights of relative importance to the 6 assigned performance scores, and rounding to the nearest integer, leads to a weighted average score for the Principle of:

92

Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

SECTION 1.6 PRINCIPLE #6: ENVIRONMENTAL IMPACT

This FSC Principle is elaborated by a set of 10 Criteria that focus on issues such as impact assessments, protection of listed species, biodiversity, reserve areas, streamside and wetlands buffers, erosion control, exotic species, chemical use, high conservation value forests, and

forest conversions. Of all the FSC Principles, this one is the most expansive in scope, with an associated high level of emphasis on data and information collection and analysis. Collectively, the thrust of this principle encourages the maintenance and restoration of natural forest conditions.

- 6.1 Assessment 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.**
- 6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping and collecting shall be controlled.**
- 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**
- 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.**
- 6.5 Written guidelines shall be prepared and implemented to: control erosion; minimise forest damage during harvesting, road construction, and all other mechanical disturbances; and protect water resources.**
- 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 Organisation Type 1A and 1B 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 minimise health and environmental risks.**
- 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.**
- 6.8 Use of biological control agents shall be documented, minimised, monitored and strictly controlled in accordance with national laws and internationally accepted**

scientific protocols. Use of genetically modified organisms shall be prohibited.

6.9 The use of exotic species shall be controlled and actively monitored to avoid adverse ecological impacts

6.10 Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion:

- 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**

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
<p>C6.1 Assessment of environmental impacts shall be completed appropriate to the scale, intensity of forest management.... and adequately integrated into management systems.</p> <p>Score: 95</p>	<ul style="list-style-type: none"> ▪ The NTMP for the Valencia Property and all THP's include a detailed environmental impact assessment (EIA). ▪ Surveys for rare, threatened, and endangered flora and fauna are conducted prior to harvesting activities. ▪ Stream surveys for Coho salmon and steelhead have been conducted on Scott's creek. ▪ A paired watershed study of the North and South forks of Little Creek is currently underway. The objective of the study is to document watershed conditions before and after harvest. ▪ Necessary mitigation measures are implemented following impact assessments. 	<p>No weaknesses noted</p>
<p>Findings: Considering the small scale and intensity of activities on SPR, the level of environmental impact assessment is exemplary. Accordingly, the team has assigned a score that connotes "outstanding conformance" with this Criterion, as elaborated by the Pacific Coast Standard.</p>		
<p>C6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats Conservation zones and protection areas shall be established...</p> <p>Score: 92</p>	<ul style="list-style-type: none"> ▪ SPR staff work with California Natural Diversity Database, California Native Plant Society, and other specialists to identify rare, threatened, and endangered flora and fauna on the property. ▪ Safeguards to protect rare, threatened, and endangered species, such as canopy retention, snag retention, sediment controls, are implemented regularly. ▪ Considerable restoration efforts, e.g., Queseria creek, have been undertaken to improve coho and steelhead habitat. ▪ The Valencia NTMP included a botanical field survey. 	<ul style="list-style-type: none"> ▪ French broom, an exotic invasive, was observed to be out competing native plants in areas of the Valencia property.
<p>Findings: Management of SPR has clearly exceeded Federal and California regulatory requirements for rare, threatened, and endangered species. SPR' efforts to identify potential forestry impacts to anadromous fish habitat, e.g., paired watershed study, and to implement protect and restore habitat is truly exemplary. Accordingly, the team has assigned a score that connotes "outstanding conformance" with this Criterion, as elaborated by the Pacific Coast Standard.</p>		

<p>C6.3 Ecological functions and values shall be maintained intact, enhanced, or restored....</p>	<ul style="list-style-type: none"> ▪ SPR is allowing for and moving portions of the forest, e.g., Tranquility Flats and General Smith Stand, to the range and distribution of age classes of trees that would result from natural processes inherent to the site. ▪ SPR's use of selection silviculture generates stand conditions that are similar to those produced by disturbance regimes, e.g., small forest gaps from windthrow, typical of the Santa Cruz Mountains. ▪ SPR selects trees for harvest and retention in a manner that encourages future productivity and genetic and species diversity of the residual stand. ▪ Lop and scatter is predominantly used- thus maximizing retention of biomass on the forest floor. ▪ Most hardwood stands are retained for wildlife and diversity purposes. ▪ Regeneration is plentiful across most of SPR ▪ When planting, SPR uses local seed source. 	<ul style="list-style-type: none"> ▪ SPR has not developed and memorialized a formal policy on old growth/heritage trees, though it was clear to the audit team that existing type II and type III old growth stands are currently being protected. (Recommendation 2003.4) ▪ Policies for retention of snags and cavity trees could be elaborated. If available through the CFI, numbers and size classes of snags per acre should be estimated and snag recruitment, if needed, should be considered. Note the Pacific Coast Standard suggests 3-10 snags per acre- averaged over 10 acres. (Rec. 2003.5)
<p>Score: 92</p>	<p>Findings: P&C 6.3 is divided into several sub criteria, which were scored individually in order to arrive at an overall score for the Criterion:</p> <ul style="list-style-type: none"> a. Forest regeneration and succession = 93 (“outstanding conformance”) b. Genetic, species, and ecosystem diversity = 90 (“outstanding conformance”) c. Natural cycles that affect the productivity of the forest = 95 (“outstanding conformance”) d. Old-growth stands and forests = 85 (“clear conformance”) e. Retention = 95 (“outstanding conformance”) <p>By taking the simple arithmetic mean of these sub-criteria the team has assigned a score, 92, that connotes “outstanding conformance” with this Criterion, as elaborated by the Pacific Coast Standard. Performance relative to sub-criterion d., Old growth stands and forests, could be improved if SPR's retention policy was formally adopted. As a result the audit team included a Recommendation for SPR to memorialize their policy on old growth retention.</p>	

<p>C6.4 Representative samples of existing ecosystems within the landscape shall be protected in their natural state..... appropriate to the scale and intensity of operations....</p>	<ul style="list-style-type: none"> ▪ Santa Cruz County contains an extensive network of protected reserves through regional and state parks and other types of open space. ▪ SPR is contributing to the efforts to protect native Monterey pine ecosystems through various pitch canker resistance studies. ▪ Critical salmonid habitat on the SPR has been identified and is being protected. 	<ul style="list-style-type: none"> ▪ SPR has not completed a formal analysis and developed a policy on what representative samples of existing ecosystems within SPR should be protected.
<p>Score: 88</p>		

<p>C6.5 Written guidelines shall be prepared and implemented to: control erosion; minimise forest damage....</p>	<ul style="list-style-type: none"> ▪ Logging costs on the SPR are 15% higher than other operations in the area because higher standard roads are built to a higher standard, volume per acre removed is less than the norm for the region, and skyline cables are often. ▪ Consistent and effective water barring of skid trails. ▪ Roads are well planned and constructed (rocked, outsloped, with rolling dips), well maintained, and surveyed annually. ▪ Most roads are gated, thus minimizing trespass and associated damage. ▪ Selection silviculture on SPR generally results in stand conditions across the entire forest that meet the outer streamside buffer requirements of the Pacific Coast standard. ▪ Harvesting along watercourses meets the inner buffer protection specifications. ▪ Damage to regeneration and residual trees is minimized. ▪ Sites with a high risk of landslide are either not logged or done so without ground-based yarding. ▪ Landings are seeded upon sale closure. ▪ When possible rock fjords are used for class III water crossing, which avoids problems with blown culverts and upkeep requirements. ▪ Domestic animals are, for the most part, kept out of watercourses. 	<ul style="list-style-type: none"> ▪ More could be done at decommissioning unnecessary roads.
<p>Score: 92</p>		
<p>Findings: The team's observation was that SPR managers are particularly sensitive to and effective at minimize erosion and sedimentation. Furthermore, forest managers are highly aware of regional water quality issues and protection guidelines that are in place meet or exceed FSC requirements. Accordingly, the team has assigned a score that connotes "outstanding conformance" with this Criterion, as elaborated by the Pacific Coast Standard.</p>		
<p>C6.6 Management systems shall promote the development and adoption of environmentally-friendly non-chemical methods of pest management....</p>	<ul style="list-style-type: none"> ▪ Herbicides are only used for the control of invasive exotic species such as French broom. ▪ No chemicals on the FSC prohibited list are being used. ▪ Forest managers employ silvicultural 	<ul style="list-style-type: none"> ▪ No weaknesses noted

<p>Score: 90</p>	<p>systems and strategies for controlling pests and/or unwanted vegetation that result in the least adverse environmental impact.</p> <ul style="list-style-type: none"> ▪ Organic agriculture is practiced on SPR. ▪ Monitoring for sudden oak death is being conducted with periodic sampling of tanoak. 	
<p>Findings: The team has assigned a score that connotes “outstanding conformance” with this Criterion, as elaborated by the Pacific Coast Standard</p>		
<p>C6.7 “Proper disposal of chemicals, containers, liquid and solid non-organic wastes “</p>	<ul style="list-style-type: none"> ▪ No improper handling of or disposal of chemicals was observed. ▪ Chemical applications are carried out by trained professionals. ▪ Logging sites were clean and free of trash related to the harvest operation. 	<ul style="list-style-type: none"> • Protocols related to the availability and use of spill kits should be more explicit to ensure uniform application among harvesting contractors.
<p>Score: 90</p>		
<p>Findings: The team has assigned a score that connotes “outstanding conformance” with this Criterion, as elaborated by the Pacific Coast Standard</p>		
<p>C6.8 Use of biological control agents shall be documented, minimised, monitored and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.</p>	<ul style="list-style-type: none"> ▪ Biological control agents are not used on the SPR. ▪ No GMO’s are used, breeding as part of the pine pitch canker resistance is strictly Medellion. 	<ul style="list-style-type: none"> ▪ It did not appear that there was an explicit integrated pest management program that considered the potential use of biological control agents.
<p>Score: 95</p>		
<p>Findings: The team has assigned a score that connotes “outstanding conformance” with this Criterion, as elaborated by the Pacific Coast Standard.</p>		
<p>C6.9 The use of exotic species shall be controlled and actively monitored to avoid adverse ecological impacts.</p>	<ul style="list-style-type: none"> ▪ Exotic species are not used on SPR. ▪ Logging equipment is cleaned prior to being brought onto Valencia property. 	<ul style="list-style-type: none"> ▪ There is no written action plan and priority list for treating invasive exotic plant species. (Rec. 2003.6)
<p>Score: 90</p>		

Findings: The two components of this Criterion, not using exotic species including GMO's and a program for control of invasive exotic species. The Team concludes performance with the former is flawless, but improvement could be made to efforts to control exotic invasive species. Accordingly, the team has assigned a score that connotes clear to "outstanding conformance" with this Criterion, as elaborated by the Pacific Coast Standard.		
C6.10 Forest conversion to plantations or non-forest land uses shall not occur....	<ul style="list-style-type: none"> Forest conversion to plantations or non-forest land uses does not occur. 	No weaknesses noted
Score: 95		
Findings: Because conversion has and in all practical likelihood will never occur on SPR, the team has assigned a score that connotes "outstanding conformance" with this Criterion, as elaborated by the Pacific Coast Standard.		

Overall Findings and Conclusions:

Principle 6 is broad in scope and requires that *"forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by doing so, maintain the ecological functions and the integrity of the forest."* SPR's level of conformance with the standard was outstanding across 9 of the 10 criteria that comprise Principle 6, with Criterion 6.4 "protection of representative samples of ecosystems" scoring slightly less in the "clear conformance" range.

Corrective Action Requests and Recommendations:

No CARs were stipulated for this Criterion

Recommendation 2003.4: SPR develop a formal policy on protecting old growth and heritage trees, that is consistent with Criterion 6.3(d) as elaborated in the Pacific Coast Standard.

Recommendation 2003.5: If available through the CFI, numbers and size classes of snags per acre should be estimated and snag recruitment, if needed, should be considered.

Recommendation 2003.6: SPR should develop a written action plan and priority list for treating invasive exotic plant species.

Importance Weighted Aggregate Score for Principle 6:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 10 Criteria in this Principle. Under SCS' accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located

FSC Principle #6 <i>Environmental Impact</i>	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
6.1	0.148	95	92
6.2	0.113	92	
6.3	0.178	92	
6.4	0.095	88	
6.5	0.066	92	
6.6	0.090	90	
6.7	0.036	90	
6.8	0.050	95	
6.9	0.059	90	
6.10	0.164	95	

Applying the normalized weights of relative importance to the 10 assigned performance scores, and rounding to the nearest integer, leads to a weighted average score for the Principle of:

92

Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

SECTION 1.7 PRINCIPLE #7: MANAGEMENT PLAN

This Principle is elaborated through 4 Criteria, which collectively call for a very high level of commitment to management planning.

7.1 The management plan and supporting documents shall provide:

- a) **Management objectives.**
- b) **Description of the forest resources to be managed, environmental limitations, land use and ownership status, socio-economic conditions, and a profile of adjacent lands.**
- c) **Description of silvicultural and/or other management system, based on the ecology of the forest in question and information gathered through resource inventories.**
- d) **Rationale for rate of annual harvest and species selection.**
- e) **Provisions for monitoring of forest growth and dynamics.**

- f) Environmental safeguards based on environmental assessments.**
 - g) Plans for the identification and protection of rare, threatened and endangered species.**
 - h) Maps describing the forest resource base including protected areas, planned management activities and land ownership.**
 - i) Description and justification of harvesting techniques and equipment to be used**
- 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 considerations.**
- 7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plan.**
- 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.**

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
C7.1 The management plan and supporting documents shall provide... Score: 95	<ul style="list-style-type: none"> ▪ Management plan for Swanton Ranch provides an excellent history of the ownership. ▪ The combination of the Swanton Ranch Management Plan, Timber Harvest Plans (THP's), the NTMP for the Valencia property, and other related documents covers the breadth of the elements listed under P&C 7.1 (a-i). ▪ Current management plans are very comprehensive and based on robust resource inventories and assessments. ▪ GIS is actively used, available on site, and frequently updated. 	<ul style="list-style-type: none"> ▪ The management plan lacks a description of socio-economic conditions and a profile of adjacent lands (P&C 7.1b).
Findings: The SPR management plan is very comprehensive, thorough, and well organized, especially when considering that this is 2997 acre ownership. Accordingly, the team has assigned a score that connotes “outstanding conformance” with this Criterion, as elaborated by the Pacific Coast Standard.		
C7.2 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 considerations. Score: 92	<ul style="list-style-type: none"> ▪ An effort to develop an NTMP for the entire SPR is underway. ▪ The SPR management was being actively revised at the time of the evaluation. ▪ Growth and yield data is incorporated into harvest calculations of plan revisions. 	<ul style="list-style-type: none"> ▪ Much of the work of the SPR plan revision is being completed by an outside consultant, thus implementation of the plan might not be as effective as it would be if completed by SPR staff. ▪ Although numerous research and monitoring activities are conducted on SPR, there is no formal methodology for incorporating results into the management plan.
Findings: Considering the small size and intensity of SPR the level of monitoring of and updating to the management plan is first-rate. Accordingly, the team has assigned a score that connotes “outstanding conformance” with this Criterion, as elaborated by the Pacific Coast Standard.		
C7.3 Forest workers shall receive adequate training and supervision to ensure proper implementation of the management plan.	<ul style="list-style-type: none"> ▪ SPR staff and interns are provided substantial training and oversight. ▪ SPR's affiliation with Cal. Poly. University's forestry program provides access to leading training in forestry and other natural resource disciplines. ▪ Effective implementation of the 	<ul style="list-style-type: none"> ▪ SPR staff have not completed a self assessment to determine key areas where additional training may be needed.

Score: 95		
Findings: The underlying mission of SPR is to provide living and learning experiences on a working forest, as a result the level of training of staff and interns as well as the interaction with Big Creek foresters is excellent. Accordingly, the team has assigned a score that connotes “outstanding conformance” with this Criterion, as elaborated by the Pacific Coast Standard.		
C7.4 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.	<ul style="list-style-type: none"> Although no summary is currently available, SPR is willing to make elements of the Valencia NTMP and SPR management plan available upon request. 	<ul style="list-style-type: none"> Swanton Pacific Ranch has not made publicly available a summary of the management plan that covers P&C 7.1 (a-i).
Score: 78		
Findings: Since no public summary of the management plan is currently available the team has assigned a score that connotes marginal non-conformance with this Criterion, as elaborated by the Pacific Coast Standard.		

Overall Findings and Conclusions:

The management plans that guide activities on SPR are comprehensive and far superior to what is typically seen on similarly sized properties. Furthermore the plan is being carefully implemented by well-trained staff from SPR and Big Creek Lumber company. Completion and posting, to the SPR website, of a summary of the plan will assure the level of transparency required by FSC is met.

Corrective Action Requests and Recommendations:

CAR.2003.1	By the time of the first annual audit after award of certification, Swanton Pacific Ranch must <i>make publicly available</i> a summary of the main elements of the management plan including those listed in P&C 7.1. Information deemed proprietary or confidential from a business standpoint does not need to be included in the public summary.
Reference	FSC P&C 7.4 – Pacific Coast Standard V. 7.9
Deadline	1 st annual audit (approx. 12 months from award of certification)

Importance Weighted Aggregate Score for Principle 7:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 4 Criteria in this Principle. Under SCS' accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located

FSC Principle #7 Management Plan	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
7.1	0.445	95	
7.2	0.165	92	
7.3	0.283	95	
7.4	0.107	78	
			93

Applying the normalized weights of relative importance to the 4 assigned performance scores, and rounding to the nearest integer, leads to a weighted average score for the Principle of:

93

Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

SECTION 1.8 PRINCIPLE #8: MONITORING AND ASSESSMENT

As a conceptual and thematic companion to Principle 7, this Principle (elaborated through 5 Criteria) requires certified operations to engage in an aggressive and formal program of periodic monitoring of the impacts of management operations, focusing upon both bio-physical and socio-economic impacts as well as the extent of plan compliance.

- 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 replicable over time to allow comparison of results and assessment of change.**
- 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;
 - e) Costs, productivity, and efficiency of forest management
- 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”**
- 8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan**
- 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.**

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
<p>C8.1 The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations as well as the relative complexity and fragility of the affected environment.</p> <p>Score: 93</p>	<ul style="list-style-type: none"> ▪ Implementation of the management plan is periodically monitored through numerous mechanisms, e.g., CFI system, water quality monitoring, stream channel surveys, road monitoring, and various research projects. ▪ A robust CFI is in place and is re-measured every 10 years. ▪ The level of annual monitoring and research activities are considered each year as part of the Budget Assumptions/Work-Plan. ▪ Detailed monitoring is undertaken at sites of special significance, e.g., threatened and impaired streams. 	<ul style="list-style-type: none"> ▪ No weaknesses noted.
<p>Findings: The core of the monitoring system on SPR is the very robust (500 x 500 ft grid) CFI system that is re-measured every 10 years. In addition to growth and volume data, the CFI provides a wealth of other forest information (e.g., regeneration, understory vegetation, age class). The level of monitoring provided by the CFI alone is far superior to monitoring on other similar sized properties. Accordingly, the team has assigned a score that connotes “outstanding conformance” with this Criterion, as elaborated by the Pacific Coast Standard.</p>		
<p>C8.2 Forest management should include the research and data ...</p> <p>Score: 95</p>	<ul style="list-style-type: none"> ▪ Monitoring and research on the SPR includes, yield of all forest products harvested, growth rates, regeneration and condition of the forest, composition and observed changes in the flora and fauna, environmental impacts of harvesting and other operations, and costs, productivity, and efficiency of forest management. ▪ Current and past research on the SPR has covered numerous topics and provided useful information for forest management. Studies include: herbicide application methods, hydrological research on critical watersheds, Light Detection and Ranging (LIDAR) measurements of stream channel changes, water quality and aquatic habitat relative to timber harvests on Little Creek, stream restoration effectiveness, Pitch Canker Resistance, Sudden Oak Death. 	<ul style="list-style-type: none"> ▪ Monitoring efforts could be improved with regard to the social impact of harvesting and other operations. (Rec. 2003.7)

Findings: The scope and intensity of biophysical monitoring on the SPR far exceeds levels that we believe the Pacific Coast Standard intends for this size operation. Key research that is taking place on the SPR, e.g., pitch canker resistance and the paired watershed study should provide useful information to forest and natural resource management well beyond the boundaries of SPR. Accordingly, the team has assigned a score that connotes “outstanding conformance” with this Criterion, as elaborated by the Pacific Coast Standard.

<p>C8.3 “Chain of Custody” Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin.</p>	<ul style="list-style-type: none"> Currently SPR is only selling standing timber and is prepared to meet CoC requirements for selling standing timber. Most harvesting is conducted by Big Creek Resource Managers, which maintains current Resource Manager and Chain of Custody certification. 	<ul style="list-style-type: none"> SPR does not have a procedures in-place for ensuring COC if and when they decide to sell their own products.
<p>Score: 85</p>		

Findings: SPR has a system in place, that is including their FSC registration code on sale prospectus, for selling standing timber as FSC certified. However, if SPR wishes to sell delivered logs or other products as FSC certified, procedures that ensure Chain of Custody must be put in place. Accordingly, for the scope of selling standing timber, the team has assigned a score that connotes clear with this Criterion, as elaborated by the Pacific Coast Standard.

<p>C8.4 The results of monitoring shall be incorporated</p>	<ul style="list-style-type: none"> SPR has a track record of incorporating the results of monitoring programs, notably CFI, into the management plan. 	<ul style="list-style-type: none"> There is no expressed formalized methodology for adaptive management.
<p>Score: 88</p>	<ul style="list-style-type: none"> Forest managers indicate active support for monitoring and a willingness to implement adaptive management. 	<ul style="list-style-type: none"> Other than the CFI, there does not appear to be a formal system for identifying and prioritizing monitoring needs. There is not comprehensive database of research activities that take place on the SPR (Rec. 2003.8)

Findings: Based upon the strengths and weaknesses listed above the team has assigned a score that connotes “clear conformance” with this Criterion, as elaborated by the Pacific Coast Standard.

<p>C8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of the monitoring indicators, including those listed in 8.2</p>	<ul style="list-style-type: none"> A great deal of information concerning the SPR has been made available to the public through meetings, publications, NTMP of the Valencia property, and other mechanisms. 	<ul style="list-style-type: none"> A public summary of the results of monitoring efforts is not available.
<p>Score: 77</p>		

Findings: Because of the lack of the public summary of monitoring efforts the team has assigned a score that connotes marginal non-conformance with this Criterion, as elaborated by the Pacific Coast Standard.

Overall Findings and Conclusions:

The overall approach to monitoring on SPR is scientifically rigorous and comprehensive. This is particularly true for growth and yield monitoring and other information provided by the CFI. Overall, our conclusion is that the existing and proposed monitoring programs are outstanding for this size ownership.

Corrective Action Requests and Recommendations:

CAR.2003.2	<p>By the time of the first annual audit after award of certification, Swanton Pacific Ranch must <i>make publicly available</i> a summary of the results of periodic monitoring, including:</p> <ul style="list-style-type: none">• Yield of forest products harvested• Growth rates, regeneration and conditions of the forest• Composition and observed changes in flora and fauna• Environmental and social impacts of harvesting and other operations• Costs, productivity, and efficiency of forest management. <p>Information deemed proprietary or confidential from a business standpoint does not need to be included in the public summary.</p>
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Recommendation 2003.7- SPR should develop a formal program to monitor social impacts of management activities.

Recommendation 2003.8- To improve the utility of the wealth of research that takes place on SPR, managers should develop an easily searchable database of research activities and results- e.g., UC Berkeley's Blodgett Forest .

Importance Weighted Aggregate Score for Principle 8:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 5 Criteria in this Principle. Under SCS' accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located.

FSC Principle #8 Monitoring and Assessment	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
8.1	0.148	93	89
8.2	0.261	95	
8.3	0.075	85	
8.4	0.376	88	
8.5	0.140	77	
			89

Applying the normalized weights of relative importance to the 5 assigned performance scores, and rounding to the nearest integer, leads to a weighted average score for the Principle of:

89

Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

SECTION 1.9 PRINCIPLE #9: MAINTENANCE OF HIGH CONSERVATION VALUE FORESTS

SECTION TO BE COMPLETED UPON RESPONSES TO MAJOR CAR FOR PRINCIPLE 9.

This FSC Principle is elaborated through 4 Criteria that collectively focus on the identification and appropriate management of areas within the defined forest area(s) that possess notable attributes meriting conservation. Such attributes may be ecological or social, in nature. Areas of high conservation value are to be managed so that the defining attributes are maintained or enhanced; focused monitoring must be undertaken with respect to efficacy of HC VF management strategies.

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

9.2. The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.

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

9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.

<i>Criterion</i>	<i>Strengths Relative to the Standard</i>	<i>Weaknesses Relative to the Standard</i>
C9.1 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.	<ul style="list-style-type: none"> ▪ Bullet items ▪ Bullet items 	<ul style="list-style-type: none"> ▪ Bullet items ▪ Bullet items
Score: —		
Findings: Accordingly, the team has assigned a score that connotes “_____” with this Criterion, as elaborated by the Pacific Coast Standard		
C9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.	<ul style="list-style-type: none"> ▪ Bullet items ▪ Bullet items 	<ul style="list-style-type: none"> ▪ Bullet items ▪ Bullet items
Score: —		
Findings: Accordingly, the team has assigned a score that connotes “_____” with this criterion, as elaborated by the Pacific Coast Standard		
C9.3 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...	<ul style="list-style-type: none"> ▪ Bullet items ▪ Bullet items 	<ul style="list-style-type: none"> ▪ Bullet items ▪ Bullet items
Score: —		

Findings:		
Accordingly, the team has assigned a score that connotes “_____” with this criterion, as elaborated by the Pacific Coast Standard		
C9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	<ul style="list-style-type: none"> ▪ Bullet items ▪ Bullet items 	<ul style="list-style-type: none"> ▪ Bullet items ▪ Bullet items
Score: —		
Findings:		
Accordingly, the team has assigned a score that connotes “_____” with this criterion, as elaborated by the Pacific Coast Standard		

Overall Findings and Conclusions:

DRAWING FROM THE STRENGTHS AND WEAKNESSES ABOVE AND THE CRITERIA-SPECIFIC SCORES, PROVIDE A CLEAR CONCISE SYNOPSIS OF PERFORMANCE RELATIVE TO THIS PRINCIPLE THAT SUPPORTS THE ASSIGNED SCORES AND CORRECTIVE ACTION REQUESTS, IF STIPULATED.

Corrective Action Requests and Recommendations:

Importance Weighted Aggregate Score for Principle 9:

Employing the PAIRWISE algorithm, the evaluation team assigned weights of relative importance for each of the 4 Criteria in this Principle. Under SCS’ accredited protocols, assignment of weights of relative importance is one means by which certification evaluations recognize and incorporate regional and sub-regional circumstances. In this case, the weights were designed to reflect the regional context in which the subject forest management unit is located.

FSC Principle #9 <i>Maintenance of High Conservation Value Forests</i>	Normalized Relative Importance Weights	Performance Scores	Weighted Average Score
9.1	.--	--	
9.2	.--	--	
9.3	.--	--	
9.4	.--	--	

Applying the normalized weights of relative importance to the 4 assigned performance scores, and rounding to the nearest integer, leads to a weighted average score for the Principle of:

—

(NOTE: SELECT ONE OF THE FOLLOWING SENTENCES BASED UPON OUTCOME)

Per SCS protocols, and as this weighted average score is in excess of 80 points, acceptable overall conformance to this FSC Principle is confirmed.

OR

Per SCS protocols, and as this weighted average score is below 80 points, the assessment process has revealed an unacceptable overall level of conformance to this FSC Principle, resulting in the specification of one or more Major Corrective Action Requests.

1.10 PRINCIPLE #10: PLANTATIONS

Principle 10 was deemed not applicable because the defined forest management unit is comprised entirely of natural forest.

2.0 TRACKING, TRACING AND IDENTIFICATION OF FOREST PRODUCTS

EXAMPLE:

This section of the report addresses the procedures employed by the forest managers to track the flow of wood products from the point of harvest through to the point where custody is assumed by another entity (i.e., the wood products purchaser). The fundamental requirement that must be demonstrated by the forest management operation is that product from the certified forest area not be mixed with product from non-certified sources. This requirement is attained by compliance with the FSC Criteria for chain of custody, which are appended to this report. It is against these Criteria that SCS evaluated COMPANY/FOREST MANAGEMENT for potential award of chain of custody certification.

COMPANY/FOREST MANAGEMENT has supplied to the SCS evaluation team a written description of its log handling and tracking procedures entitled: *GIVE TITLE*. Based upon a review of that document, interviews with COMPANY/FOREST MANAGEMENT personnel and field inspections, we conclude the following.

2.1 EVALUATION OF RISKS OF MIXING CERTIFIED AND UN-CERTIFIED PRODUCT

GIVE AN EVALUATION OF THE RISK OF PRODUCTS FROM NON-CERTIFIED SOURCES BEING MIXED WITH PRODUCTS FROM THE FOREST AREAS BEING EVALUATED.

2.2 DESCRIPTION OF THE LOG CONTROL SYSTEM

A DESCRIPTION OF THE CONTROL SYSTEMS IN PLACE THAT ADDRESS THE RISK IDENTIFIED IN 8.1 ABOVE;

2.3 END POINT OF CHAIN OF CUSTODY

DESCRIPTION OF THE FINAL POINT (E.G. LOG YARD OR DEPOT) AT WHICH THE CERTIFICATION BODY GUARANTEES THAT A PRODUCT IS SOURCED FROM THE FOREST AREA EVALUATED;

2.4 VISUAL IDENTIFICATION AT END POINT OF CHAIN OF CUSTODY

A DESCRIPTION OF THE DOCUMENTATION OR MARKING SYSTEM THAT ALLOWS PRODUCTS FROM THE CERTIFIED FOREST AREA TO BE RELIABLY IDENTIFIED AS SUCH AT THE POINT SPECIFIED IN 10.3, ABOVE

3.0 CONTROVERSIAL ISSUES

Explicit identification and discussion of controversial issues

4.0 CERTIFICATION RECOMMENDATION

4.1 EXPLANATION OF SCORING AND WEIGHTING METHODS

The scoring and weighting procedures employed by SCS are discussed elsewhere in this report. They are also described in detail in the SCS *Forest Conservation Program* Operations Manual, available upon request from SCS' Emeryville, California, office.

4.2 RECOMMENDATION

As detailed throughout this report, and consistent with the accredited SCS *Forest Conservation Program* evaluation protocols, certification of the Sample Company Forest is recommended without (with conditions).

5.0 APPENDICES

5.1 AGREEMENT ON THE IMPLEMENTATION OF CERTIFICATION CONDITIONS

As part of the certification contract between Scientific Certification Systems (SCS) and Sample Company, Sample Company agrees to comply with the conditions stipulated below within the stated time frames. Non-compliance with these conditions could lead to withdraw of certification.

See Section ____ of this report for a **List of Conditions**.

The signed copy of Conditions Agreement is on file at the SCS Main Office.

5.2 PEER REVIEWER COMMENTS

Include all peer review comments. The evaluation team must respond to each of the reviewer's comments.

5.3 CONVERSION ENGLISH UNITS TO METRIC UNITS TABLE

Length Conversion Factors

To convert from	to	multiply by
mile (US Statute)	kilometer (km)	1.609347
inch (in)	millimeter (mm)	25.4 *
inch (in)	centimeter (cm)	2.54 *
inch (in)	meter (m)	0.0254 *
foot (ft)	meter (m)	0.3048 *
yard (yd)	meter (m)	0.9144 *

Area Conversion Factors

To convert from	to	multiply by
square foot (sq ft)	square meter (sq m)	0.09290304 E
square inch (sq in)	square meter (sq m)	0.00064516 E
square yard (sq yd)	square meter (sq m)	0.83612736 E
acre (ac)	hectare (ha)	0.4047

Volume Conversion Factors

Volume

To convert from	to	multiply by
cubic inch (cu in)	cubic meter (cu m)	0.00001639
cubic foot (cu ft)	cubic meter (cu m)	0.02831685
cubic yard (cu yd)	cubic meter (cu m)	0.7645549
gallon (gal)	liter	4.546
Canada liquid gallon (gal)	cubic meter (cu m)	0.004546
Canada liquid gallon (gal)	liter	3.7854118
U.S. liquid** gallon (gal)	cubic meter (cu m)	0.00378541
U.S. liquid fluid ounce (fl oz)	milliliters (ml)	29.57353
fluid ounce (fl oz)	cubic meter (cu m)	0.00002957

Mass Conversion Factors

pound (lb)	kilogram (kg)	0.4535924
avoirdupois ton, 2000 lb	kilogram (kg)	907.1848
grain	kilogram (kg)	0.0000648

Temperature Conversion Factors

degree Fahrenheit (F)	degree Celsius (C)	$t_c = (t_F - 32) / 1.8$
degree Fahrenheit (F)	kelvin (K)	$t_k = (t_F + 459.7) / 1.8$
kelvin (K)	degree Celsius (C)	$t_c = t_k - 273.15$

Velocity

mile per hour (mph)	kilometer per hour (km/hr)	1.60934
mile per hour (mph)	meter per second (m/s)	0.44704

1 acre	= 0.404686 hectares
1,000 acres	= 404.686 hectares
1 board foot	= 0.00348 cubic meters
1,000 board feet	= 3.48 cubic meters
1 cubic foot	= 0.028317 cubic meters
1,000 cubic feet	= 28.317 cubic meters

Breast height = 1.4 meters, or 4 1/2 feet, above ground level

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

5.4 PUBLIC NOTIFICATION LETTER

EXAMPLE



Public Notification Letter

To: Interested Parties
From: Scientific Certification Systems
Date: 5/13/2003
Re: Notification of Pending FSC Certification Evaluation of Potlatch's Idaho Timberlands

Potlatch Corporation is seeking Forest Stewardship Council (FSC) endorsed certification for their Idaho Timberland, which is comprised of approximately 670,000 acres of land owned fee-simple by the corporation. Potlatch Corporation, headquartered in Spokane, Washington, is a vertically-integrated forest products company with landholdings in Idaho, Minnesota, Arkansas, and Oregon totaling approximately 1.5 million acres.

Scope and Certification Evaluation Process

Scientific Certification Systems (SCS), a FSC-accredited certification body based in Emeryville, California, will conduct the evaluation. SCS will evaluate the Idaho Region of the Potlatch Resource Management Division (RMD), headquartered in Lewiston, Idaho for compliance with the Forest Stewardship Council's Principles and Guidelines. Pursuant to FSC protocols, performance will be evaluated against the FSC Rocky Mountain Regional Standard, which is fully endorsed by the FSC Secretariat. A copy of the standard is attached along with this notification letter.

The Evaluation Process Includes the Following Phases:

- a) Public notification, distribution of the standard, solicitation of comments on the certification applicant
- b) Synthesis and summary of stakeholder comments received prior to start of field component of the full evaluation
- c) Audit Planning for the full evaluation
- d) Document review
- e) Field assessment - A representative sample of field sites and operations within the defined forest area are inspected.
- f) Stakeholder consultation
- g) Synthesis of findings and scoring – Compliance with the standard is ascertained and the certification decision is formulated
- h) Draft report – A report describing the evaluation process, findings, and certification decision is produced.
- i) Peer review – The evaluation report is peer reviewed by 3 independent scientists.
- j) Delivery of final certification report

- k) If certification is awarded, a public summary of the certification report will be released, and posted to www.scs-certified.com.

Evaluation Team

The evaluation will be conducted by a four person team led by Dr. Robert Hrubes, SCS Senior Vice-President and California Registered Professional Forester. The remaining team members will be natural resource professionals with combined expertise in forestry, wildlife biology and or ecology, and socio-economics.

Call for Public Participation

SCS welcomes comments on Potlatch's management of their Idaho Timberlands and other topics pertinent to their seeking FSC certification, such as identification of high conservation value forests² within Potlatch's Idaho Timberlands. Comments can be submitted via email, standard mail, or facsimile to SCS Program Director, Dave Wager (contact information below)

Dates

The field evaluation is scheduled to commence on July 21, 2003.

Dispute Resolution Procedure

As provided by the FSC Interim Dispute Resolution Protocol (Document 1.4.3) and the SCS Forest Conservation Program Operations Manual, dispute resolution procedures are in place and available to interested parties.

Additional Information

More information about FSC and SCS can be obtained from www.fsc.org and www.scs-certified.com. Information on Potlatch's Idaho forestlands can be found at www.potlatchcorp.com/envrnmnt/idaho.html.

Dave Wager	Robert J. Hrubes, PhD
Director Forest Management Certification	Team Leader and SCS Senior Vice-President
Scientific Certification Systems	Scientific Certification Systems
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^{2 2} High Conservation Value Forests possess one or more of the following attributes: a) forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (eg. endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance b) forest areas that are in or contain rare, threatened or endangered ecosystems c) forest areas that provide basic services of nature in critical situations (eg. watershed protection, erosion control) d) forest areas fundamental to meeting basic needs of local communities (eg. 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). Also see Principle 9, in the FSC Rocky Mountain Standard.

5.5 STAKEHOLDER GROUPS AND INDIVIDUALS

Prior to, during, and following the site evaluation, a wide range of stakeholders from the regional area were consulted in regard to their relationship with the Sample Company, and their views on the management of the Sample Forest. Stakeholders included FSC contact persons, government and non-government organizations involved in forest management, local citizens and groups, employees, contractors, and others. Stakeholders were contacted with a notification mailing soliciting comment and/or phone contact. Comments were received via meetings and personal interviews “face-to-face”, phone interviews (“Interview”), and through written responses. Individuals or groups not offering feedback are labeled “no response” (“NR”).

Name	Affiliation	Type of Communication
John Ambrose	National Marine Fisheries Service	Interview
Steve Auten	Big Creek Lumber Company	Interview
Dr. Doug Piirto	Cal Poly	Interview
Brian C. Dietterick	Cal Poly	Interview
Samantha J. Gill	UC Berkeley	NR
John H. Harris	Cal Poly	NR
Timothy G. O'Keefe	Cal Poly	NR
Norman H. Pillsbury	Cal Poly	NR
Carolyn B. Shank	Cal Poly	NR
Richard P. Thompson	Cal Poly	NR
James R. Vilkitis	Cal Poly	NR
Chris Discus	Cal Poly	Interview
John Bulger	Consultant biologist	NR
Jodi Frediani	Sierra Club	NR
Joanna Becker	Consultant	Interview
Walter Mark	Cal Poly/SPR	Interview
Ryan Hilburn	SPR	Interview
Kent Aut	CA Fish and Came	Interview
Kate Anderton	Save the Redwoods	Interview
FSC Pacific Coast Regional Working Group (30 individuals/groups)		NR