

# The Conservation Fund

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Chapel Hill, NC 27514

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C0144679

SFI 2015-2019 Standards and Rules<sup>®</sup>, Section 2, Forest Management

2017 Recertification– December 10, 2017



**NSF International**

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# NSF International Forestry Program Audit Report

**A. Certificate Holder**

The Conservation Fund

**NSF Customer Number (FRS)**

C0144679

**Contact Information**

David B. Whitehouse, CWB, Forest Operations Manager, Working Forest Fund®

The Conservation Fund

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Chapel Hill, NC 27514

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[dwhitehouse@conservationfund.org](mailto:dwhitehouse@conservationfund.org)

**B. Scope of Certification**

The management of lands in The Conservation Fund’s Working Forest Fund and related properties meeting Objectives 1 through 12, 14 and 15. The SFI Forest Management number is NSF-SFI-FM-C0144679.

**Locations Included in the certification**

Provided in a separate file

**C. Audit Team**

Mike Ferrucci, NSF Lead Auditor; Tucker Watts & Michelle Matteo, Team Auditors; Stefan Bergmann, SCS Lead Auditor

**D. Significant Changes to Operations or to the Standard(s)**

None

**E. Audit Results**

No nonconformities or opportunities for improvement were identified.

There were 4 opportunities for improvement identified.

List and describe: Provided in summary report

There were 0 minor nonconformities identified.

There were 0 major nonconformities identified.

Issues identified at previous audits reviewed for continued conformance.

List and describe: OPI’s related to logger training, management plan approval (Buckeye) and criteria for rutting were all addressed by TCF and reviewed by the audit team, with findings of conformance.

**F. Audit Planning and Summary**

Sites/Facilities (include dates)					
Audited (A) or Planned (P)	Registration / Reassessment	Surveillance 1	Surveillance 2	Surveillance 3	Surveillance 4
Dates	October 2015	September 29-30; October 3-6 and 31; November 1 & 4, 2016	August 24, September 26; October 3-5, 26; and November 3		
Sites	North Coast, California: Big River/Salmon Creek, Gualala, and Buckeye, CA McConnell Pond, VT Success Pond and Bald Cap, NH Okefenokee Fargo, GA	North Coast, California: Big River/Salmon Creek, Gualala, Garcia River and Buckeye, CA Sansavilla, GA Jamaica Tract, Jamaica, VT Stanley Tract, Kent, CT	North Coast, California: Garcia, Big River Success Pond, New Hampshire Twin Lakes, Wisconsin Cranberry Lake, NY CFI, Georgia		

Yes     No     N/A    Accreditation logos (e.g. ANSI/ANAB) are utilized correctly in accordance with NSF SOP 14680 and SOP 4876. If no, a nonconformity should be issued.

For reassessment or re-certification audits, describe the organization’s performance and conformance to the standard(s) over the period of the certification. This includes a review of all audits since the registration or most recent reassessment and should take into consideration interactions between processes and locations, and external changes. Specify what records were reviewed to reach this conclusion.

Audit reports, charters and management review records were reviewed for 2017, 2016, and 2015. SFI annual reports were also reviewed for the same 3 years which demonstrate organization’s performance and conformance to the SFI 2015-2019 standard requirements for the central office and all the regions in the scope of the audit. Interviews, document reviews and observations, such as the fact that TCF addressed both internal and external findings as well as opportunities for improvement support the continual performance of their program. The conclusion determined by NSF auditor is that the SFI system continues to be fully effective.

**G. Appendices**

[Appendix 1:](#) Audit Notification Letter and Audit Agenda

[Appendix 2:](#) SFI Forest Management Public Summary Report

[Appendix 3:](#) Audit Standard Checklist - SFI Forest Management Standard

[Appendix 4:](#) Meeting Attendance

[Appendix 5:](#) Site Visit Notes



Appendix 1

Audit Notification Letter and Audit Agenda

August 13, 2017 (Slight Revisions August 31, 2017)

David Whitehouse, Forest Operations Manager, Working Forest Fund®
The Conservation Fund
77 Vilcom Center, Suite 340
Chapel Hill, NC 27514

RE: 2017 SFI Surveillance Audit/ changed to Reassessment Audit

Dear David,

As we discussed, I will be conducting the audit of your program's continued conformance to the SFI 2015-2019 Forest Management Standard as described in the attached itinerary. We have recently confirmed that these dates are still appropriate for the audits. The California portion of the audits will be conducted in conjunction with your FSC audits of the same properties by Stefan Bergmann of SCS Global.

Audit Scope

The audit will be a recertification audit to the SFI 2015-2019 Forest Management Standard and a scope expansion. As such all requirements of the SFI 2015-2019 Forest Management Standard will be reviewed.

The current scope includes these properties:

Table with 3 columns: Dual-Certified Properties, State, Acres. Rows include Garcia, Big River/Salmon Creek, Gualala, Buckeye, East Grand Lake, Success Pond, Penfield, Bobcat Ridge, Chesapeake, and McConnell Pond.

Table with 3 columns: SFI-Only Properties, State, Acres. Rows include Little River Canyon Preserve, Mendocino National Forest, Stanley Works, Okefenokee NWR, Pinhoti Trail, Chattahoochee James Sisson, Maritime Marine WMA, Galestown Creek, Wapiti Farms, LLC, Lower Devil's Swamp Little Biloxi Wolf River, Reeves Jackson, and East Fork French Broad.



Pisgah Backbone Ridge	NC	251
Bald Cap	NH	1,227
Waccamaw NWR	SC	28
Francis Marion	SC	10
Redtown	TX	1,521
Big Thicket	TX	118
Petersburg	VA	212
Biddle/Bray	VT	290
AT Bridgewater Barnard	VT	217
Spruce Peak	VT	14
Canaan Valley Refuge	WV	1
Sansavilla	GA	12,003
Reed	ME	32,431
Brunswick	NC	3,670
Cranberry Lake	NY	8,162
Yankee (VT, NH)	2	24,675
Twin Lakes	WI	13,732
Logan	WV	21,012
Cleveland National Forest	CA	306

<b>New SFI 2017</b>		
Property	State	Acres
CFI	GA	14,225

During the 2017 audit the following properties will be visited:

- Properties within existing scope (5 of 41): North Coast, California: Garcia, Big River; Success Pond in New Hampshire; Twin Lakes, Wisconsin; and Cranberry, NY
- Associated with scope expansion (1 of 1): CFI, GA -149,225 acres

### Preparing for the SFI Audit

I would like to review evidence of the following:

- Approval for logo usage
- Internal Audit and Management Review records
- Documentation for operation of complaint procedure
- Documentation for multisite requirements

Please have this information available for me **during the audit**, except as noted below.

The California and New Hampshire portions of this audit are being conducted in conjunction with your FSC Forest Management Audit (conducted by SCS Global). Please provide me any information or documents that you provide to SCS Global or to their assigned Lead Auditor. This will help reduce the burden that the dual audit process places on you and your team.

**To the degree possible** in advance of the audit, please provide key written evidence for the SFI requirements selected for review (see list below). I would ask that you place particular emphasis on SFI-focused requirement (SFI Implementation Committee involvement, SFI reporting, etc.) as these are often overlooked when customers prepare for dual audits. Also in advance please provide your procedures and/or policies manuals, including any SFI-specific or Forest Certification-specific procedures or policies.



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## All SFI Requirements to be Reviewed during the 2017 Recertification Audit

(Note: The first number indicates the Objective; for example, 10.1 is under Objective10)

1.1, 1.2: California Properties – major changes only; Other Properties Audited in 2017 – all requirements.

All requirements within Objectives 2 through 7 (these are primarily field-oriented requirements) to the extent they are relevant to the field sites inspected.

- 10.1: In-kind support or funding for forest research
- 10.2: Develop or use state, provincial or regional analyses
- 10.3: Broaden the awareness of climate change impacts on forests, wildlife and biological diversity
- 11.1: Training of Contractors and Personnel: Only *Indicator 11.1.5* involving contractor training
- 12.1: Support and promote efforts to apply principles of Sustainable Forest Management
- 12.2: Public outreach, education and involvement related to Sustainable Forest Management
- 12.3: Practices that appear inconsistent with the SFI Standard principles and objectives
- 14.1: Summary Audit Report
- 14.2: Annual Reporting to SFI, Inc.
- 15.1: Management Review System

## Role of SFI Inc. Office of Label Use and Licensing

As a reminder, your organization is responsible for contacting SFI, Inc. and complying with all requirements before using or changing any SFI label or logo. Your contact is:

Rachel Dierolf, Manager of Statistics and Labeling  
Sustainable Forestry Initiative, Inc.  
900 17<sup>th</sup> Street NW, Suite 700, Washington, DC 20006  
613-274-0124 [rachel.dierolf@sfiprogram.org](mailto:rachel.dierolf@sfiprogram.org)

## Agenda for Review

Attached for your review is the tentative agenda that will guide the conduct of the audit. Please contact me via email or phone if you would like to recommend changes or have any questions regarding what is needed for the audit.

Thank you for selecting NSF International to provide your audit services.

Sincerely,

Mike Ferrucci, SFI Lead Auditor

203-887-9248 | [mferrucci@iforest.com](mailto:mferrucci@iforest.com)

## Audit Agenda

### Type of Audit

- |   |   |                                       |
|---|---|---------------------------------------|
| <input type="checkbox"/> Readiness Review (Stage 1) | <input type="checkbox"/> Registration (Stage 2) | <input type="checkbox"/> Surveillance |
| <input checked="" type="checkbox"/> Reassessment    | <input type="checkbox"/> Transfer               | <input type="checkbox"/> Verification |

### Audit Objectives

Determine if certification should be maintained by reviewing selected requirements and program changes.

### General Schedule

Audit Type	Location	Tracts	Dates	Days	Travel days	Auditor	TCF Rep
SFI	Wisconsin	Twin Lakes	Aug. 24	Thursday	Wed and Fri	Mike Ferrucci	Whitehouse
SFI	New York	Cranberry	Sept. 26	Tuesday	Mon and Wed	Ferrucci	Whitehouse
FSC and SFI	California	2 CA tracts	October, 4 and 5	Wednesday & Thursday	Tuesday and Friday	Ferrucci and Bergmann	Newberger
FSC and SFI	New Hampshire	Success Pond	October 4	Wednesday	Tuesday and Friday	Michelle Matteo	Whitehouse
SFI	Georgia	CFI	October 26	Thursday		Tucker Watts	Whitehouse

### Detailed Schedule

Day/Date	Time	Activity/Process and Location to be Audited
August 23	Evening?	SFI Opening Meeting – Ferrucci and Whitehouse at hotel
August 24	8 am to 4 pm	SFI only - Twin Lakes, Wisconsin: Field Audit
September 25	Evening?	Dinner Meeting – Ferrucci and Whitehouse at hotel in Tupper Lake
September 26	8 am to 4 pm	SFI only - Cranberry, New York: Field Audit
October 3	6 pm	Auditors travel to Fort Bragg, arrival by 6 pm
October 4	8 am	Joint FSC/SFI, Success Pond, New Hampshire: Field Audit
October 4	8 am	Joint FSC/SFI, California: Opening Meeting at TCF Office
	8:15 am to 10 am	Office review of relevant requirements Objectives 1, 5, 10, 12, 15
	10 am -6:15 pm	Field review of activities on North Coast California properties; Review relevant requirements Objectives 1-7
October 5	8 am-2 pm	Field review of activities on North Coast California properties (continued); Review relevant requirements Objectives 1-7
	2 -3 pm	Office review of selected documentation and discussion of outstanding issues
	3-4 pm	Preliminary Closing Meeting, California portion Audit
	Afternoon/ Evening	Auditors return to San Francisco; review issues during drive (Suggested hotel: Best Western El Rancho Inn, 1100 El Camino Real, Millbrae, CA)
Oct. 26	8 am to 4:30 pm	SFI only - CFI Georgia: Field Audit
November 3	9 -11 am	Closing Meeting, SFI 2017 Audit (Proposed)

## Appendix 2:

# The Conservation Fund 2017 SFI Forest Management Public Summary Report

## Introduction

The SFI Program of The Conservation Fund of Chapel Hill, North Carolina has demonstrated conformance with the SFI 2015-2019 Standard and Rules, Section 2 – Forest Management Standard, according to the NSF Certification Process.

NSF International initially certified The Conservation Fund on July 1, 2007 and recertified the program in 2012 and in 2015, when organization was re-certified to the new SFI 2015-2019 Forest Management Standard requirements. This report describes the 2017 Audit designed to review all of the requirements in order to recertify the program and align it with another certification. The audit team also reviewed changes in the standard, changes in operations, the management review system, and efforts at continuous improvement, all of which were subject to detailed review. The audit included a review of lands in California, Georgia, Wisconsin, New York and New Hampshire, comprising 6 of the 42 named properties making up the program.

## Program Background

The Conservation Fund's certified land base includes most portions of its Working Forest Fund, excluding lands slated for sale over the short term. All of the forestland will have working forest conservation easements to ensure long-term forest management and conservation. The fund is described in the Working Forest Fund Policy Digest:

*The Conservation Fund launched the Working Forest Fund in 2009 to address a major conservation challenge: the loss of America's last big forests. Over the next 20 years, according to the U.S. Forest Service, as much as 26 million acres of our forests will be sold, much of it broken into pieces and either developed or the mature trees heavily logged. As forests become fragmented, their ability to filter our water and air is compromised and there is less space for wildlife to live and migrate.*

*The Working Forest Fund is a dedicated source of conservation bridge capital that allows us to acquire and sustainably manage working forests with high conservation value, saving them from inappropriate development while working with our conservation partners to get land permanently protected. Support from foundations and private philanthropists makes this possible.*

The program's largest tracts are managed collectively as The North Coast Forest Conservation Program in California. 72,000 acres of working forestland in five major tracts located in the coastal portion of Mendocino and Sonoma Counties, California are included. These forests support second and third-growth stands of coastal redwood, Douglas-fir, pine, and related species, with some areas of oak prairie and pygmy cypress trees. The forests are generally well-roaded, blocked in, and provide an opportunity for demonstrating the conservation of aquatic and upland resources in a working-forest context.

*The Conservation Fund's California forest properties were acquired as part of the Fund's North Coast Forest Conservation Initiative, which is dedicated to the permanent protection and restoration of coastal forests in the Redwood Region of northern California. The strategic foundation for the Initiative is described in "Conservation Prospects for the North Coast" prepared in 2005 by The Conservation Fund for the California Coastal Conservancy. This study noted the extraordinary biological diversity and economic productivity of the coastal forests of the Redwood Region and recommended that conservationists "move quickly to establish 'working landscape' conservation management on large, strategically located forest .... Properties in Humboldt, Mendocino and Del Norte counties."*

*The Conservation Fund acquired the 23,785-acre Garcia River Forest in February, 2004. In October 2006, The Conservation Fund acquired an additional 16,100 acres in two tracts – the 11,707-acre Big River Forest and the 4,204-acre Salmon Creek Forest. In December 2011, The Fund acquired the 13,537-acre Gualala River Forest. The Fund acquired the 177-acre Hardell property, adjacent to Salmon Creek, in September of 2012. The Hardell property will be managed as part of the Salmon Creek tract. In 2013, the Fund acquired the 18,120-acre Buckeye Forest in Sonoma County. The Conservation Fund and its partners developed an Integrated Resource Management Plan (IRMP) for each acquisition to guide the management and restoration plan for these properties. Partners include the State Coastal Conservancy, Wildlife Conservation Board, State Water Board, North Coast Regional Water Quality Control Board, David and Lucile Packard Foundation, Nature Conservancy, and National Fish and Wildlife Foundation and Sonoma County Agricultural Preservation and Open Space District. These properties represent a collective capital investment of approximately \$120 million.*



*By acquiring these properties, the Fund and its partners hope to demonstrate that these large tracts of intensively managed coastal forest can gradually be returned to sustainable timber production and ecological vitality through the use of innovative financing and patient management by a nonprofit organization in partnership with private and public agencies and community stakeholders.*

Source: North Coast Policy Digest 8/14/2015

The management objectives are summarized in this paragraph from one representative Timber Harvest Plan:

*Objectives: The long-term objective is to maintain the ownership as a working forest while harvesting less than growth in order to increase timber stocks and average tree size across the landscape. TCF strives to use uneven aged regeneration methods that promote and maintain structural and compositional forest diversity and provide habitat for a variety of terrestrial and aquatic species while still allowing for sustainable timber harvest. Individual tree and group selection harvests as well as tanoak reduction treatments will be used to restore conifer site occupancy by providing growing space for new conifer age classes and vigorous established conifers. TCF will continue long-term investments in the road infrastructure in order to reduce the potential for sediment delivery.*

Source: Timber Harvest Plan summary, Ironing Board THP, Big River Forest

Beyond California, the certified portions of the Working Forest Fund and other certified parcels consist of properties totaling 212,000 acres in Alabama, Connecticut, Georgia, Louisiana, Maine, Maryland, Mississippi, New Hampshire, New York, North Carolina, South Carolina, Texas, Virginia, Pennsylvania, Vermont, West Virginia, and Wisconsin.

The Conservation Fund’s SFI Program is managed by David Whitehouse, Forest Operations Manager.

The audit was performed by NSF in September, October, and November by an audit team headed by Mike Ferrucci, Lead Auditor supported by Tucker Watts and Michelle Matteo, Team Auditors. Audit team members fulfill the qualification criteria for conducting audits contained in SFI 2015-2019 Standards and Rules, Section 9 - Procedures and Auditor Qualifications and Accreditation.

The objective of the audit was to assess conformance of the firm’s SFI Program to the requirements of the SFI 2015-2019 Standard and Rules, Section 2 – Forest Management. The scope of the audit included forest management operations. Forest practices that were the focus of field inspections included those that have been under active management over the planning period of the past 3 years. In addition, practices conducted earlier were also reviewed as appropriate (regeneration and BMP issues, for example), SFI obligations to promote sustainable forestry practices, to seek legal compliance, and to incorporate continual improvement systems were also within the scope of the audit.

The SFI Standard was used without modifying any requirements. The following indicators are not applicable:

Number	Requirement	Reason
2.1.3.	Plantings of exotic tree species should minimize risk to native ecosystems.	No exotic tree species are planted.
2.1.5	Afforestation programs that consider potential ecological impacts of the selection and planting of tree species in non-forested landscapes.	There is no tree planting in non-forested landscapes.
2.5.1	Program for appropriate research, testing, evaluation and deployment of improved planting stock, including varietal seedlings.	No planting with improved stock.
8.2	Program Participants with forest management responsibilities on public lands shall confer with affected Indigenous Peoples with respect to sustainable forest management practices.	The Conservation Fund does not have forest management responsibilities on public lands.
10.1.2	Research on genetically engineered trees via forest tree biotechnology shall adhere to all applicable federal, state, and provincial regulations and international protocols ratified by the United States and/or Canada depending on jurisdiction of management.	The Conservation Fund is not engaged in research addressing genetic engineering of trees.
11.2.3	Participation in or support of SFI Implementation Committees to establish criteria for recognition of logger certification programs, where they exist	The Conservation Fund does not participate in an SFI Implementation Committees in states where there is a logger certification program.
Objective 13	To participate and implement sustainable forest management on public lands.	The Conservation Fund does not have management responsibilities for public lands.

## Audit Process

NSF initiated the audit process with a series of planning phone calls to confirm the scope of the audit, review the SFI Indicators and evidence to be used to assess conformance, verify that the Company was prepared to proceed to the Surveillance Audit, and to prepare a detailed audit plan. NSF then conducted the Surveillance Audit of conformance to the SFI 2015-2019 Standards and Rules®, Section 2. A report was prepared and final approval was done by an independent Certification Board member assigned by NSF. Follow-up or Surveillance Audits are required by SFI, Section 9. The next Surveillance Audit is scheduled for the fall of 2018.

The audit was governed by a detailed audit plan designed to enable the audit team to efficiently determine conformance with the applicable SFI requirements. The plan provided for the assembly and review of audit evidence consisting of documents, interviews, and on-site inspections of ongoing or completed forest practices.

During the audit NSF reviewed a sample of the written documentation assembled to provide objective evidence of Conformance. NSF also selected field sites for inspection based upon the risk of environmental impact, likelihood of occurrence, special features, and other criteria outlined in the NSF protocols. NSF also selected and interviewed stakeholders such as contract loggers, landowners and other interested parties, and interviewed employees within the organization to confirm that the SFI Standard was understood and actively implemented.

The possible findings of the audit included Full Conformance, Major Non-conformance, Minor Non-conformance, Opportunities for Improvement, and Practices that exceeded the Basic Requirements of the standard.

## Overview of Audit Findings

NSF found conformance with each indicator reviewed on the Georgia, New Hampshire, New York, Wisconsin, and North Coast California properties and determined that there were no non-conformances. As such, the Conservation Fund was found to be in overall conformance and the program was recommended for continued conformance to the SFI 2015-2019 Forest Management Standard.

## Opportunities for Improvement

There were four Opportunities for Improvement.

### **SFI – Indicator 4.1.2: Opportunity for Improvement**

There is an Opportunity for Improvement in awareness of the importance of hollow portions of trees having potential as dens or habitat providing shelter. (Twin Lakes Tract, a SFI-only property)

Indicator 4.1.2. Development of criteria and implementation of practices, as guided by regionally based best scientific information, to retain stand-level wildlife habitat elements such as snags, stumps, mast trees, down woody debris, den trees and nest trees.

### **SFI – Indicator 5.3.2: Opportunity for Improvement**

Performance Measure 5.3. *Program Participants* shall adopt a *greenup requirement* or alternative methods that provide for *visual quality*. Indicators: 2. Harvest area tracking system to demonstrate conformance with the *green-up requirement* or alternative methods.

The Monitoring Plans noted in the Multiple Resource Management Plan for Success Pond Tract states that “after harvests are completed, they will be inspected at least once per year for the next two years, and reports will be included in quarterly reports”. Per interview, a visual inspection occurs and if problems are viewed, this would be noted in quarterly reports and appropriate post-harvest action taken. While there was no evidence in the field to show that the green-up requirement is not being followed, there is not a defined harvest area tracking system to demonstrate conformance with the *green-up requirement* or alternative methods. There is an OFI to document and quantify the regeneration on harvest sites to demonstrate conformance with the green-up requirement.

### **SFI - Performance Measure 8.3: Opportunity for Improvement**

Performance Measure 8.3. Program Participants are encouraged to communicate with and shall respond to local Indigenous Peoples with respect to sustainable forest management practices on their private lands.

The Multiple Resource Management Plan for Success Pond Tract identifies four communities of indigenous people in the Success Pond area. TCF has conducted outreach to two of the communities of indigenous people (currently, there are no federally recognized tribes in New Hampshire), however there is an opportunity to improve outreach to other locally recognized indigenous groups referenced in the management plan.

The forest manager could communicate with the other two communities of indigenous people in their consultation to identify sites of current or traditional cultural, archeological, ecological, economic or religious significance.

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**SFI – Indicator 10.3.2: Opportunity for Improvement**

Indicator 10.3.2. Program Participants are knowledgeable about climate change impacts on wildlife, wildlife habitats and conservation of biological diversity through international, national, regional or local programs.

Opportunity for Improvement: Not all field foresters could describe predicted climate change patterns or impacts beyond very general statements.

**Exceptional Practices**

NSF also identified the following areas where forestry practices and operations of The Conservation Fund exceed the basic requirements of the SFI Standard:

**SFI Indicator 4.1.1:** Program to incorporate the conservation of native biological diversity, including species, wildlife habitats and ecological community types at stand and landscape levels.

The Conservation Fund's management at the stand and landscape-level are exemplary in the degree to which the conservation of native biological diversity is factored into all forest management actions.

**SFI Indicator 4.1.5:** Program to address conservation of known sites with viable occurrences of significant species of concern.

The Conservation Fund's efforts to manage special sites and significant species of concern are exemplary.

**SFI Indicator 4.1.6:** Identification and protection of non-forested wetlands, including bogs, fens and marshes, and vernal pools of ecological significance.

The Conservation Fund exceeds the standard by employing exceptional efforts to identify non-forested wetlands and ensure their protection.

**SFI Indicator 4.3.1:** Use of information such as existing natural heritage data or expert advice in identifying or selecting ecologically important sites for protection.

The Conservation Fund exceeds the standard by conducting comprehensive on-site surveys to select ecologically important sites for protection.

**SFI Indicator 5.4.1:** Provide recreational opportunities for the public, where consistent with forest management objectives.

The Conservation Fund exceeds the standard by providing public recreational opportunities throughout the forests it owns and manages.

**SFI Indicator 12.1.3:** Participation in efforts to support or promote conservation of managed forests through voluntary market-based incentive programs such as current-use taxation programs, Forest Legacy Program or conservation easements.

The Conservation Fund has an exceptional program for the long-term conservation and protection of managed forests.

**SFI Indicator 12.2.1:** Periodic educational opportunities promoting sustainable forestry

The Conservation Fund provides an exceptional level of public education and involvement related to sustainable forest management.

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## General Description of Evidence of Conformity

NSF's audit team used a variety of evidence to determine conformance. A general description of this evidence is provided below, organized by SFI Objective.

### Objective 1 Forest Management Planning

To ensure forest management plans include long-term sustainable harvest levels and measures to avoid forest conversion.

*Summary of Evidence:* The forest management plans for each property audited and supporting documentation and the associated inventory data and growth models were the key evidence of conformance.

### Objective 2 Forest Health and Productivity

To ensure long-term forest productivity, carbon storage and conservation of forest resources through prompt reforestation, afforestation, minimized chemical use, soil conservation, and protecting forests from damaging agents.

*Summary of Evidence:* Field observations and associated records were used to confirm practices. The Conservation Fund has programs for reforestation, for protection against insects, diseases, and wildfire, and for careful management of activities which could potentially impact soil and long-term productivity. Experienced professional foresters oversee all aspects of forest management.

### Objective 3 Protection and Maintenance of Water Resources

To protect the water quality of rivers, streams, lakes, wetlands and other water bodies through meeting or exceeding best management practices.

*Summary of Evidence:* Field observations of a range of sites were the key evidence. Auditors visited the portions of field sites that were close to water resources.

### Objective 4 Conservation of Biological Diversity

To manage the quality and distribution of wildlife habitats and contribute to the conservation of biological diversity by developing and implementing stand- and landscape-level measures that promote a diversity of types of habitat and successional stages, and the conservation of forest plants and animals, including aquatic species, as well as threatened and endangered species, Forests with Exceptional Conservation Value, old-growth forests and ecologically important sites.

*Summary of Evidence:* Field observations, written plans and policies, records showing programs and practices that support conservation of biological diversity, the use of college-trained field biologists, availability of specialists, and regular staff involvement in conferences and workshops that cover scientific advances were the evidence used to assess the requirements involved biodiversity conservation.

### Objective 5 Management of Visual Quality and Recreational Benefits

To manage the visual impact of forest operations and provide recreational opportunities for the public.

*Summary of Evidence:* Field observations of completed operations and policies/procedures for visual quality were assessed during the evaluation. Further maps of recreation sites, combined with field visits, helped confirm a strong recreation program.

### Objective 6 Protection of Special Sites

To manage lands that are geologically or culturally important in a manner that takes into account their unique qualities.

*Summary of Evidence:* Field observations of completed operations, records of special sites, training records, and written protection plans were all assessed during the evaluation.

### Objective 7 Efficient Use of Fiber Resources

To minimize waste and ensure the efficient use of fiber resources.

*Summary of Evidence:* Field observations of completed operations, contract clauses, and discussions with supervising field foresters, including consulting foresters, provided the key evidence.

### Objective 8 Recognize and Respect Indigenous Peoples' Rights

To recognize and respect Indigenous Peoples' rights and traditional knowledge.

*Summary of Evidence:* A review of policies as well as programs to communicate with tribes were used to find conformance.

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**Objective 9 Legal and Regulatory Compliance**

To comply with applicable federal, provincial, state and local laws and regulations.

*Summary of Evidence:* Field reviews of ongoing and completed operations were the most critical evidence. Professional foresters with training in laws and regulations plan and oversee all projects. No evidence of non-compliance with laws was found.

**Objective 10 Forestry Research, Science and Technology**

To invest in forestry research, science and technology, upon which sustainable forest management decisions are based and broaden the awareness of climate change impacts on forests, wildlife and biological diversity.

*Summary of Evidence:* In-kind support for research was confirmed by review of documents and by interviews.

**Objective 11 Training and Education**

To improve the implementation of sustainable forestry practices through appropriate training and education programs.

*Summary of Evidence:* Training records of personnel, records associated with harvest sites audited, and review of state training database provided confirmation of participation in training programs.

**Objective 12 Community Involvement and Landowner Outreach**

To broaden the practice of sustainable forestry through public outreach, education, and involvement, and to support the efforts of SFI Implementation Committees.

*Summary of Evidence:* Outreach reports, agendas for meetings, and selected summaries of comments were sufficient to assess the requirements.

**Objective 13 Public Land Management Responsibilities**

To participate and implement sustainable forest management on public lands.

*Summary of Evidence:* N.A. The Conservation Fund does not have management responsibilities for public lands.

**Objective 14 Communications and Public Reporting**

To increase transparency and to annually report progress on conformance with the SFI Forest Management Standard.

*Summary of Evidence:* Reports filed with SFI Inc. and the SFI Inc. website provided the key evidence.

**Objective 15 Management Review and Continual Improvement**

To promote continual improvement in the practice of sustainable forestry by conducting a management review and monitoring performance.

*Summary of Evidence:* Records of program reviews, agendas and notes from management review meetings, and interviews with personnel involved in management review were assessed.

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## Relevance of Forestry Certification

Third-party certification provides assurance that forests are being managed under the principles of sustainable forestry, which are described in the Sustainable Forestry Initiative Standard as:

### 1. Sustainable Forestry

To practice sustainable forestry to meet the needs of the present without compromising the ability of future generations to meet their own needs by practicing a land stewardship ethic that integrates reforestation and the managing, growing, nurturing and harvesting of trees for useful products and ecosystem services such as the conservation of soil, air and water quality, carbon, biological diversity, wildlife and aquatic habitats, recreation and aesthetics.

### 2. Forest Productivity and Health

To provide for regeneration after harvest and maintain the productive capacity of the forest land base, and to protect and maintain long-term forest and soil productivity. In addition, to protect forests from economically or environmentally undesirable levels of wildfire, pests, diseases, invasive exotic plants and animals and other damaging agents and thus maintain and improve long-term forest health and productivity.

### 3. Protection of Water Resources

To protect water bodies and riparian areas, and to conform with forestry best management practices to protect water quality.

### 4. Protection of Biological Diversity

To manage forests in ways that protect and promote biological diversity, including animal and plant species, wildlife habitats, and ecological or natural community types.

### 5. Aesthetics and Recreation

To manage the visual impacts of forest operations, and to provide recreational opportunities for the public.

### 6. Protection of Special Sites

To manage lands that are ecologically, geologically or culturally important in a manner that takes into account their unique qualities.

### 7. Responsible Fiber Sourcing Practices in North America

To use and promote among other forest landowners sustainable forestry practices that are both scientifically credible and economically, environmentally and socially responsible.

### 8. Legal Compliance

To comply with applicable federal, provincial, state, and local forestry and related environmental laws, statutes, and regulations.

### 9. Research

To support advances in sustainable forest management through forestry research, science and technology.

### 10. Training and Education

To improve the practice of sustainable forestry through training and education programs.

### 11. Community Involvement and Social Responsibility

To broaden the practice of sustainable forestry on all lands through community involvement, socially responsible practices, and through recognition and respect of Indigenous Peoples' rights and traditional forest-related knowledge.

### 12. Transparency

To broaden the understanding of forest certification to the SFI Standard by documenting certification audits and making the findings publicly available.

### 13. Continual Improvement

To continually improve the practice of forest management, and to monitor, measure and report performance in achieving the commitment to sustainable forestry.



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## 14. Avoidance of Controversial Sources including Illegal Logging in Offshore Fiber Sourcing

*(Applies only to the SFI 2015-2019 Fiber Sourcing Standard)*

To avoid wood fiber from illegally logged forests when procuring fiber outside of North America, and to avoid sourcing fiber from countries without effective social laws.

**Source:** Sustainable Forestry Initiative® (SFI) Standard, 2015–2019 Edition

### For Additional Information Contact:

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Appendix 3

SFI Forest Management Standard Audit Checklist

FRS# C0144679 – The Conservation Fund

Date of audits: September 30; October 4-6; November 1 and 4, 2017

1.2 Additional Requirements

SFI Program Participants with fiber sourcing programs (acquisition of roundwood and field-manufactured or primary-mill residual chips, pulp and veneer to support a forest products facility), must also conform to the SFI 2015-2019 Fiber Sourcing Standard.

[X] N/A [ ] Conformance [ ] Exceeds [ ] O.F.I. [ ] Major NC [ ] Minor NC

Audit Notes:

Use of the SFI on-product labels and claims shall follow Section 5 - Rules for Use of SFI On-Product Labels and Off-Product Marks as well as ISO 14020:2000.

[ ] N/A [X] Conformance [ ] Exceeds [ ] O.F.I. [ ] Major NC [ ] Minor NC

Audit Notes: Web Site

Email from SFI dated Friday, May 05, 2017 approving wording regarding SFI in the North Coast California: "North Coast Forest Conservation Initiative - 2016 Annual Review".



## Objective 1 Forest Management Planning

To ensure forest management plans include *long-term* sustainable harvest levels and measures to avoid forest conversion.

### Performance Measure 1.1

*Program Participants* shall ensure that forest management plans include *long-term* harvest levels that are sustainable and consistent with appropriate *growth-and-yield models*.

N/A  
  Conformance  
  Exceeds  
  O.F.I.  
  Major NC  
  Minor NC

Audit Notes: **2017:** This requirement was reviewed during the 2017 audits for properties not previously audited and confirmed.

Twin Lakes, Wisconsin:

Estimated annual growth of 7481 tons; actual harvest in 2016 was the Copper Peak Timber Sale, a northern hardwood selection harvest on 28 acres (my rough estimate is 250 cords, or 700+- tons).

Cranberry Lake, New York:

Document from F&W “Timber Harvest Sustainability Summary and Tracking” indicates for total harvest ():

Product	Sawtimber (MBF)	Pulpwood Harvest (cords)	Total Harvest (cords)
Total Ten-Year Allowable Harvest	6,960	9,990	23,391
Forecasted from Management Plan	888	10,160	11,936
Actual Harvests to Date	639	5,305	6,583

**2016:** From “SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries”:

The Conservation Fund (TCF), and its subsidiaries, own and manage lands for a variety of purposes, which generally do not involve timber production and economic returns as a major objective. The purpose of owning forest land is to obtain high conservation value properties, hold them for a period of time, and then transfer or sell them to another conservation organization or agency for long-term protection and conservation.

TCF owns and manages two general categories of properties: 1) Working Forests 2) High Conservation Value Lands. Working Forests are managed through TCF's Working Forest Fund program which actively manages high conservation value forest lands for multiple purposes including timber resource value. High Conservation Value Lands are held for a relatively short amount of time and are not actively managed for timber resources... harvests rarely, if ever, occur on High Conservation Value Lands”

Reviewed TCF Working Forest Fund webpage

<http://www.conservationfund.org/what-we-do/working-forest-fund>

Review North Coast California webpage:

<http://www.conservationfund.org/projects/north-coast-forest-conservation-initiative>

Review North Coast Reference Documents webpage:

<http://www.conservationfund.org/projects/north-coast-forest-conservation-initiative/north-coast-reference-documents>

Public Summary Of The Conservation Fund’s Working Forest Fund® Program Forest Management Plans

Sansavilla Tract Management Plan - June 23, 2016

North Coast California management plans reviewed:

- Gualala River Forest Integrated Resource Management Plan, August 2014
- Big River and Salmon Creek Integrative Resource Management Plan, August 2009
- Garcia River Forest Integrative Resource Management Plan, August 2006
- Draft Buckeye Forest Integrated Resource Management Plan, January 26, 2016

The Draft Buckeye IRMP has been approved by partners, with the exception of the public access component, which has been complicated by ROW issues. A detailed chronology provided by TCF shows that TCF is doing what it can to move the plan approval forward.

Management Plans for 5 small tracts which are not part of the Working Forest Fund® were also reviewed:

- CA-Ten Mile River Ranch - Vest Land LMP

- CT-Stanley Works LMP
- GA-Foxfire (Sisson) LMP
- NC – Kings Mtn –Plonk LMP
- SC – Waccamaw NWR – Normandy LMP

Forest Management Plan for Land Belonging to The Conservation Fund in Jamaica, Vermont. Prepared by Redstart Forestry, 356 Juniper Chase, Corinth, Vermont 05039. September 2014

1.1.1. Forest management planning at a level appropriate to the size and scale of the operation, including:

- a. a *long-term* resources analysis;
- b. a periodic or ongoing *forest inventory*;
- c. a land classification system;
- d. biodiversity at *landscape* scales;
- e. soils inventory and maps, where available;
- f. access to *growth-and-yield modeling* capabilities;
- g. up-to-date maps or a geographic information system (GIS);
- h. recommended sustainable harvest levels for areas available for harvest; and
- i. a review of non-timber issues (e.g., recreation, tourism, pilot projects and economic incentive *programs* to promote water *protection*, carbon storage, *bioenergy feedstock* production, or *biological diversity conservation*, or to address climate-induced ecosystem change).

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** TCF employs two forest growth and yield specialists and has forest modeling and decision-support capabilities.

This requirement was only reviewed during the 2017 audits for properties not previously audited and confirmed.

Cranberry Lake, New York

The management plan includes a, b, c, g, h, and i. Soils maps are not sufficiently precise to be useful.

Cranberry Lake maps included: Forest Cover, Harvests with Stands, Aerial with Harvests

Twin Lakes, Wisconsin

Twin Lakes Forest Management Plan 8-8-17 includes a, b, c, d, e, g, h, i

Twin Lakes Forest Cover Map C-Size 5-31-2016

North Coast California

Integrated Resource Management Plans for individual properties are available at

<https://www.conservationfund.org/projects/north-coast-forest-conservation-initiative/north-coast-reference-documents>

The 2017 updated Garcia River Plan was reviewed by partners and there are comments from The Nature Conservancy, the easement holder, still undergoing review. Approval and finalization of the new plan is expected before the end of 2017.

**Resolution of 2016 OFIs (see below for listing of these in 2016), North Coast California:**

- The “Buckeye Forest Integrated Resource Management Plan, January 26, 2016” was approved March 6, 2017.
- The “Draft Garcia River Forest Integrative Resource Management Plan” was submitted to The Nature Conservancy (easement holder) and the State Coast Conservancy (major funder) on August 7, 2017. Comments were received from SCC on September 18, 2017 and from TNC on September 20, 2017. TCF will respond ASAP with an updated version for approval.

CFI, Georgia; Success Pond, New Hampshire

Confirmed in field, documentation, and interview.

**2016:**

**There is an Opportunity for Improvement in the management plans for 2 properties:**

- The “Draft Buckeye Forest Integrated Resource Management Plan, January 26, 2016” has not been finalized.
- The “Garcia River Forest Integrative Resource Management Plan, August 2006” is due for an update.

From page 121 of the “Garcia River Forest Integrative Resource Management Plan, August 2006”

E. PLAN REVISION PROCESS: Consistent with our adaptive management approach as well as requirements of state funding and the conservation easement, this management plan will be updated periodically, not less than every ten years, to reflect the condition of the Property as it changes over time and as management activities are implemented.

From TCF SFI Program document: “Upon closing on a new Working Forest Fund tract, TCF will direct a consultant to develop and implement a forest management plan within 1 year for most tracts. The plan will follow the requirements of this SFI program. The plans shall be designed to shape and direct the productivity of each tract toward the attainment of the goals set forth by TCF and in compliance with the SFI standards. The plan may be a set of related documents rather than a single management document.”

Sansavilla Tract, Georgia: Sansavilla Tract Management Plan includes a, b, c, d, h, i. Prior to harvests a pre-harvest plan and report are completed; prior to other significant management actions an activity plan is developed. Examples of these were reviewed by the auditor.

Soil Map and report were seen on GIS and in pdf soil report

Demonstration of GIS and maps, including the map of “The Conservation Fund Sansavilla, GA – Past, Present, and Future Harvests”, confirmed e and g.

Interviewed Kevin Harnish Analyst, Working Forest Fund® who described the method used to develop the growth estimates. Details are provided under SFI Indicator 1.1.3 below.

North Coast California: See notes for Performance Measure 1.1 above for a list of the relevant management plans. These plans and the assessment listed below meet requirements a, b, c, d, e, h, and i.

Conservation Prospects for the North Coast: *A Review and Analysis of Existing Conservation Plans, Land Use Trends and Strategies for Conservation on the North Coast of California.*

<http://www.conservationfund.org/images/projects/files/North-Coast-Conservation-Prospects.pdf>

Requirements f and h confirmed by review of The Conservation Fund Option A Plan to Determine Long Term Sustained Yield, Scott Kelly, North Coast Timberland Manager, RPF 2408 (file “TCF CA Sustained Yield Plan\_Option A”). The “Policy Digest” also supports conformance.

Requirement g confirmed by review of maps in management plans, THPs, and other maps reviewed during audit.

1.1.2. Documented current harvest trends fall within long-term sustainable levels identified in the forest management plan.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017: North Coast California:**

From: Maranto, Chris@CALFIRE [mailto:Chris.Maranto@fire.ca.gov]  
Sent: Thursday, September 21, 2017 12:16 PM

To: Kelly, Scott <skelly@conservationfund.org>

Subject: RE: Option A monitoring: Actual per acre harvest (6.3 MBF) is pretty close to projected (7.4).

Reviewed “TCF CA\_Harvest Volume History\_2007-2016” which provides volumes by year and by tract, including Big River, Salmon Creek, and Garcia River tracts; the other two tracts have not had any harvest. Three of. The total LTSY for the three forests that the forests have had timber harvests is 17,800 MBF/year:

- The Salmon Creek Forest (4,389 acres) calculated LTSY over the one-hundred-year planning horizon is 2,766 MBF/year.
- The Big River Forest (11,707 acres) calculated LTSY over the 100-year planning horizon is 7,840 MBF/ Year.
- The Garcia River Forest (23,769 acres) calculated LTSY for Garcia is 7,175 MBF/year.

Actual harvests have never exceeded 32% in any year and have averaged 19.5% of calculated LTSY.

2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
5077.57	3727.66	1554.68	5600.02	993.80	5438.29	2737.29	3752.49	3768.35	2012.56

Cranberry Lake: Allowable harvest level provided in chart “Timber Harvest Sustainability Summary and Tracking” (see above) which showed 10-year allowable harvest based on FIA data for the region, 10-year forecasted harvest from the management plan (all treatments planned for the first three years of the ten-year period) and harvests thus far. The harvests are on track to total slightly lower than planned.

Twin Lakes: Allowable harvest level far exceeds actual harvest.

CFI, Georgia: Confirmed in field, documentation, and interview.

**2016:** Sansavilla Tract Management Plan: The Conservation Fund is managing this tract as requested by the Georgia DNR which will be the owner. Restoration of the Longleaf-wiregrass or the slash pine communities is desired, in accordance with well-considered local and landscape assessments and plans, including the Georgia State Wildlife Action Plan. Initially TCF will harvest more than the growth amount to meet the ecological goals, with all harvested stands reforested to meet site-specific prescriptions within the broader goals.

North Coast California: Reviewed "TCF CA\_Harvest Volume History\_2007-2016" which provides volumes by year and by tract, including Big River, Salmon Creek, and Garcia River tracts; the other two tracts have not had any harvest.

2007	2008	2009	2010	2011	2012	2013	2014	2015	2016
5077.57	3727.66	1554.68	5600.02	993.80	5438.29	2737.29	3752.49	3768.35	1535.49

1.1.3. A forest inventory system and a method to calculate growth and yield.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** North Coast California: All properties have robust forest inventory systems in place, associated with carbon accounting goals and/or ongoing carbon trading programs.

CFI, Georgia: Confirmed in field, documentation, and interview.

**2016:** Sansavilla Tract, Georgia: Inventory was provided by the previous owner. The cruise included data on type, age, dominant species, average DBH, and volumes per acre by species and age class. For natural stands productivity estimates are based on soils; Information from soil surveys as to "Forest Productivity (Cubic Feet per Acre per Year)" by species was reviewed. For planted stands the volumes are modeled based on site index and regional growth and yield models.

Interviewed Kevin Harnish Analyst, Working Forest Fund®: Kevin described the method used to develop the growth estimates. For natural stands cubic foot volume growth rates are based on soil type and were reviewed. For plantations he uses regional growth and yield models and the site index to project the growth of each stand/stand type. In the southeastern U.S. the GYST program (developed at Virginia Tech) is used to develop growth curves. Elsewhere the Forest Vegetation Simulator (FVS) is used to develop growth curves. Next, he uses a program he developed to move the growth projection data into REMSOFT's Woodstock Spatial Planner to optimize the harvest schedule.

Jamaica Tract, Vermont: "Information was collected at 20 sampling points, taken at 8-chain intervals in August 2014."

1.1.4. Periodic updates of *forest inventory* and recalculation of planned harvests to account for changes in growth due to *productivity* increases or decreases, including but not limited to: improved data, *long-term* drought, fertilization, *climate change*, changes in forest land ownership and tenure, or *forest health*.

- N/A  Conformance  Exceeds  O.F.I.  Major NC  Minor NC

Audit Notes: **2017:** North Coast California:

Forest inventory summary for each forest group (Garcia River, Gualala, Big River/Salmon Creek) including:

- Inventory Year
- Conifer MBF/acre
- Conifer BF/acre
- SE (Conifer BF)
- Accuracy % (90% CI)

Garcia River Forest				
Inventory Year	Conifer MBF/acre	Conifer BF/acre	SE (Conifer BF)	Accuracy % (90% CI)
2010	9.98	9,984	446	7.3%
2015	13.73	13,732	465	5.6%

5.46% BF/acre/year growth for conifer

Gualala River Forest				
Inventory Year	Conifer MBF/acre	Conifer BF/acre	SE (Conifer BF)	Accuracy % (90% CI)
2008	7.4	7,365.39	440	9.8%
2015	9.5	9,470.05	551	9.6%

3.17% BF/acre/year growth for conifer

Big River/Salmon Creek Forests				
Inventory Year	Conifer MBF/Acre	Conifer BF/acre	SE (Conifer BF)	Accuracy % (90% CI)
2007	19.4	19,438	400	3.4%
2015	23.7	23,719	1,181	8.2%

2.26% BF/acre/year growth for conifer

This is a summary of the most recent (2015) inventory per property and a summary of the preceding inventory (year varies by property) in conifer board feet compiled in FORSEE.

The data show steady increases in standing volumes, consistent with overall strategy, goals, and plans.

**2016:** From “SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries”:

Documentation & Monitoring: Pre- and Post- Harvest inventory will be conducted on every harvest using the Monitoring Checklist (TCF-SFI-08) unless otherwise directed by TCF. The pre-harvest inventory will require a certain number of plots (harvest-specific) to be measured to get an accurate estimate of volume and revenue from the harvest and to predict residual stand attributes. The post-harvest inventory is intended to provide updated data to inform future decisions for silvicultural prescriptions.

Sansavilla Tract, Georgia: “Sansavilla Stand Data 8-1-2016” lists, for each stand, Dominant Species  
 Dominant Stand Stand # Acres AGE Pine Tons Total Hardwood Tons Total.

1.1.5. Documentation of forest practices (e.g., *planting*, fertilization and thinning) consistent with assumptions in harvest plans.

- N/A  Conformance  Exceeds  O.F.I.  Major NC  Minor NC

Audit Notes: **2017:** CFI, Georgia; Success Pond, New Hampshire: Confirmed in field, documentation, and interview.

**2016:** Jamaica Tract, Vermont: Interviews and observation confirmed light touch on this tract.

Sansavilla Tract, Georgia: The map of “The Conservation Fund Sansavilla, GA – Past, Present, and Future Harvests” shows the harvest and planting plan; records of implementation were confirmed.

North Coast California

Records are kept using GIS and various computer software programs (Excel, Word). All records requested during the audit were readily available. There is an emphasis on the collection and use of data to support strong commitments to transparency, monitoring, and continuous improvement. The North Coast Forest Conservation Initiative - 2015 Annual Review and annual versions of the same from 2009 through 2015 available on line are an excellent example of one product of the attention to accumulating, assessing, and reporting relevant data.

**Performance Measure 1.2**

*Program Participants* shall not convert one *forest cover type* to another *forest cover type*, unless in justified circumstances.

- 1.2.1. Program Participants shall not convert one *forest cover type* to another *forest cover type*, unless the conversion:
- Is in compliance with relevant national and regional *policy* and legislation related to land use and forest management; and
  - Would not convert *native* forest types that are rare and ecologically significant at the *landscape* level or put any *native* forest types at risk of becoming rare; and
  - Does not create significant long-term adverse impacts on Forests with Exceptional Conservation Value, old-growth forests, forests critical to threatened and endangered species, and special sites.

- N/A  Conformance  Exceeds  O.F.I.  Major NC  Minor NC

Audit Notes: **2017, 2016:** A policy consistent with this SFI Indicator is stated in the “SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries”.

Review of management plans, interviews with staff and partner organizations confirm conformance.

North Coast California

A long-term program is in place to control and treat tanoak, which is present in greater density than is desirable. The unnaturally-high density of tanoak was caused in part by different management practices and in part by long-term fire exclusion. There are also some efforts to adjust composition and location of Douglas-fir and Redwood. In all such cases significant amounts of field analyses support written prescriptions which then must past multi-disciplinary regulatory review in most cases. Rare types are being increased, not diminished.

CFI, Georgia; Success Pond, New Hampshire

Properties adjacent to the Bullard WMA are being converted from Loblolly and Slash Pine to the Longleaf Pine ecosystem. This is a restoration effort on behalf of the GA DNR. Their goal is to restore the longleaf ecosystem across as much of the landscape of the property as possible. Conversion is to a rare and ecologically significant landscape that is identified as rare.

- 1.2.2. Where a *Program Participant* intends to convert another *forest cover type*, an assessment considers:
- a. *Productivity* and *stand* quality conditions and impacts which may include social and economic values;
  - b. Specific ecosystem issues related to the site such as invasive species, insect or disease issues, riparian *protection* needs and others as appropriate to site including regeneration challenges; and
  - c. Ecological impacts of the conversion including a review at the site and *landscape* scale as well as consideration for any appropriate mitigation measures.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017, 2016:** North Coast Forest Conservation Program: Prior to each harvest or vegetation management treatment (silviculture) foresters assess field conditions and develop a detailed prescription which covers the required issues. A long-term program is in place to control and treat tanoak, which is present in greater density than is desirable. The unnaturally-high density of tanoak was caused in part by different management practices and in part by long-term fire exclusion. There are also some efforts to adjust composition and location of Douglas-fir and Redwood. In all such cases significant amounts of field analyses support written prescriptions which then must past multi-disciplinary regulatory review in most cases. Rare types are being increased, not diminished.  
 CFI, Georgia; Success Pond, New Hampshire: CFI Tract Management Plan includes assessment.  
**2016:** Sansavilla Tract, Georgia: The conversion from dense Loblolly Pine plantations to the either Slash Pine or Longleaf Pine, each having a more open stand structure, is driven by the habitat needs of the gopher tortoise and is based on local and landscape-scale ecological analyses.

**Performance Measure 1.3**

*Program Participants* shall not have within the scope of their certification to this *SFI Standard*, forest lands that have been converted to non-forest land use. Indicator:

- 1.3.1. Forest lands converted to other land uses shall not be certified to this *SFI Standard*. This does not apply to forest lands used for forest and *wildlife* management such as *wildlife* food plots or infrastructure such as forest roads, log processing areas, trails etc.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017, 2016:** A policy consistent with this SFI Indicator is stated in the “SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries”.

TCF does not intend to convert forest properties to other land uses. If any such conversions were to take place in the future, those lands would be removed from the scope of the SFI Program.

CFI, Georgia:  
 No forest land is being converted to other land uses. Confirmed in field, documentation, and interview.

**2016:** Sansavilla Tract, Georgia:  
 Sansavilla Tract Management Plan: “No stands in the FMU have been converted to non-forest use.”  
 North Coast Forest Conservation Program: No conversions per observations and interviews.



## Objective 2 Forest Health and Productivity

To ensure *long-term* forest *productivity*, carbon storage and *conservation* of forest resources through prompt *reforestation*, *afforestation*, *minimized* chemical use, *soil conservation*, and protecting forests from damaging agents.

### Performance Measure 2.1

*Program Participants* shall promptly reforest after final harvest. Indicators:

- 2.1.1. Documented *reforestation* plans, including designation of all harvest areas for either natural, planted or direct seeded regeneration and prompt *reforestation*, unless delayed for site-specific environmental or *forest health* considerations or legal requirements, through *planting* within two years or two *planting* seasons, or by planned *natural regeneration* methods within five years.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017, 2016:** The Reforestation Program is described in the “SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries” as well as in individual stand and project plans.

CFI, Georgia; Success Pond, New Hampshire: Confirmed in field, documentation, and interview. Where appropriate, containerized Longleaf Pine seedlings are planted. When soil conditions are not appropriate for Longleaf Pine, bare root Loblolly or Slash Pine are planted. Natural regeneration is used in NH.

- 2.1.2 Clear criteria to judge adequate regeneration and appropriate actions to correct understocked areas and achieve acceptable species composition and stocking rates for *planting*, *direct seeding* and *natural regeneration*.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** Rutting criteria have been clarified: “In-Woods Rutting Policy” 8.07.17. This policy has been distributed to all consulting foresters who have been instructed to distribute it to loggers.

Interviews showed that foresters understand the policy.

**2016:** There is an Opportunity for Improvement in the clarity of criteria to address rutting during timber harvests.

North Coast Forest Conservation Program: Reforestation is covered in legal requirements of the 2015 California Forest Practices Rules.

Sansavilla Tract, Georgia - Sansavilla Tract Management Plan: “Prior to each harvest a pre-harvest planning process and report will be completed. This form will describe the post-activity condition, the silvicultural system to be used, an evaluation of the current environment, safeguards, stakeholder input, and all other requirements.”

“Prior to all other significant forest management activities, an activity planning process and report will be completed, addressing, as applicable, all of the information listed in the bullet point above and any additional issues that must be addressed, such as burn permit number/permission for prescribed burning and species and planting density for tree planting.”

- 2.1.3. Plantings of exotic tree species should minimize risk to native ecosystems.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017, 2016:** No exotics are planted at any time on The Conservation Fund’s lands.

- 2.1.4. *Protection* of desirable or planned advanced *natural regeneration* during harvest.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** North Coast California: Redwood seedlings and saplings are intentionally released via non-commercial treatments and where feasible as part of commercial harvests.

Cranberry Lake Tract, New York: Field observations of completed harvests confirmed minimal impacts on residual trees, including regeneration.

Twin Lakes Tract, Wisconsin: Field observations on a completed selection harvest confirmed that advance regeneration Sugar maple seedlings and saplings were present throughout the harvest areas.

Success Pond, New Hampshire: Field observations on a completed selection harvest confirmed that advance regeneration seedlings and saplings of multiple species were present and protected throughout the harvest areas.

CFI, Georgia: Confirmed in field.

**2016:** Sansavilla Tract, Georgia: The objectives for this property are to change the composition from existing Loblolly pine dominated to Longleaf Pine and Slash Pine, so there is no need to protect existing Loblolly pine regeneration.

North Coast Forest Conservation Program: Field observations confirmed careful felling and yarding practices.

On units having multi-aged conditions the desirable advanced regeneration was generally intact following harvest.

2.1.5. *Afforestation programs* that consider potential ecological impacts of the selection and *planting* of tree species in non-forested *landscapes*.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** There is no afforestation conducted on the audited properties, which are already forested.

**2016:** Sansavilla, Jamaica, Stanley Works: There is no afforestation conducted on the 3 properties, which are already forested.

North Coast Forest Conservation Program: There is no afforestation conducted on the 5 properties, which are already forested.

## Performance Measure 2.2

*Program Participants* shall *minimize* chemical use required to achieve management *objectives* while protecting employees, neighbors, the public and the environment, including *wildlife* and *aquatic habitats*. Indicators:

2.2.1. *Minimized* chemical use required to achieve management *objectives*.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** North Coast California: "Herbicide Policy Updated 10.31.16", including this information describing the reason for the reduced use of hack-and-squirt herbicide (Imazapyr) application for controlling Tanoak: "In 2016 Measure V was passed by the Mendocino County voters, which reads: "trees taller than five (5) meters, which have been intentionally killed and left standing for longer than ninety (90) days (except those that are left for the benefit of wildlife habitat) be considered a public nuisance."

"Herbicide Use Record Updated 9.14.17xls" shows no herbicide use in 2015 or 2016 and very minimal in 2017. On the Garcia River Forest, a total of 2 gallons of Glyphosate was applied as a roadside foliar spray on 21 acres at 12 ounces per acre (0.38 pounds per acre) of Glyphosate. Glyphosate is considered to be low toxicity and rapidly breaks down after soil contact. This is a very minimal use of chemicals.

Cranberry Lake Tract, New York: Limited herbicide use for invasive species removal, done by The Nature Conservancy under contract.

CFI, Georgia: Witnessed prescription, application report, and flight lines. Chemical are used for site preparation and being applied to a small percentage of the total acreage. Confirmed in field.

On Sansavilla, GA 1457.2 acres were chemically site prepped. Higher number of acres due to the longleaf restoration – Arsenal 24 fl. oz., Garlon 54 fl oz., Sunset 10 fl oz. (surfactant). Also 252.5 acres were treated with herbaceous weed control - Oustar 10 fl oz.

On CFI, GA 487 acres were chemically site prepped using (Imazapyr 48 fl oz. and Glyphosate 128 fl oz.

On Brunswick, NC 41.5 acres were treated with herbaceous weed control to reduce competition in longleaf seedlings planted in 2015 – Oustar 150 lbs., garlon XRT 130 lbs., Bark Oil Blue 410 lbs. (surfactant)

**2016:** From "SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries":

Forest Chemical Program: Herbicides can be a valuable tool in forest management and may be used to control competing vegetation, minimize the spread of invasive species and to enhance and speed stand establishment. TCF's Forest Operations Manager/Forestry Consultants may use herbicides for competition control during site preparation to improve regeneration success and for pine release.

The Forest Operations Manager/Forestry Consultants continually strive to accomplish silvicultural objectives using the minimum amount of herbicide possible and using the narrowest spectrum herbicide, while meeting operational objectives. Herbicides are applied by subcontractors based on site-specific conditions including competing species, soils and application timing.

The Forest Operations Manager/Forestry Consultants shall evaluate prospective application areas. The Forest Operations Manager approves contracts for chemical application prescriptions based on the silvicultural needs of



the site. Chemical use shall be planned so as not to exceed levels necessary to achieve specific management objectives. The Forest Operations Manager/Forestry Consultants shall only contract with licensed and certified chemical application contractors. Their applicators licenses are checked prior to awarding the contract.

North Coast Forest Conservation Program: Reviewed the “TCF CA Herbicide Use Record 9.20.16”. The predominant treatment is “hack and squirt” using Imazapyr for Tanoak reduction. The second, and far less common, use is foliar treatment of invasive plants using Glyphosate.

In 2015 on the Big River tract 24 acres of “hack and squirt” using Imazapyr for Tanoak reduction, titled “Tanoak treatment study”. Also on Big River in 2016 hack and squirt 46 acres of all Tanoak >20 inches on the Little North Fork project. There was no herbicide use in Garcia River in 2015 for Tanoak reduction or any other purpose.

Typically, less than one-half of one-tenth of one percent of the acres are treated annually with chemicals, which are only applied when there is no other economically-viable option.

2.2.2 Use of least-toxic and narrowest-spectrum pesticides necessary to achieve management objectives.

N/A  Conformance  Exceeds  O.F.I.  Major NC  Minor NC

Audit Notes: **2017:** North Coast California: Use of Roundup or Imazapyr confirms; very minimal use.

Cranberry Lake Tract, New York: Treatments solely for invasive control using Round-up – Accord formulation for control of Japanese knotweed and Rodeo formulation for control of common reed (allowed for use in wetlands).

CFI, Georgia: Witnessed prescription, application report, and flight lines. Chemical are used for site preparation and being applied to a small percentage of the total acreage. Confirmed in field.

**2016:** Sansavilla Tract, Georgia: Customized herbicide prescriptions deploy standard chemical formulations.

North Coast Forest Conservation Program: Imazapyr is used for Tanoak control; tanoak is very challenging to control. A trial of three tanoak control alternatives was done on the Big River Forest: chain saw felling, hack and squirt of selected tanoak competing with crop trees, and the same treatment to kill all tanoak trees 20 inches dbh or smaller. Hand felling is very expensive.

Monitoring Plan for a Study on Methods of Tanoak Control, Big River Forest, Mendocino County, CA - Inventory Collection Manual and Specifications, June 15, 2015

2.2.3. Use of pesticides registered for the intended use and applied in accordance with label requirements.

N/A  Conformance  Exceeds  O.F.I.  Major NC  Minor NC

Audit Notes: **2017:** Cranberry Lake Tract, New York: Treatments solely for invasive control using Round-up – Accord formulation for control of Japanese knotweed and Rodeo formulation for control of common reed (allowed for use in wetlands). These uses are in accordance with the labels.

CFI, Georgia: Witnessed prescription, application report, and flight lines. Chemical are used for site preparation and being applied to a small percentage of the total acreage. Confirmed in field.

**2016:** Sansavilla Tract, Georgia: Interviews and review of records showed that the chemicals are used at or below label rates and are used as listed on the label.

North Coast Forest Conservation Program: Foresters who are California RPFs confirm that the planned prescription is consistent with the Label/MSDS. The THP forester and forest manager also review the prescription. Obtain “Restricted Materials Permit” from Mendocino County and notify county for any applications, with reporting.

Post signs with 30-days’ notice.

Qualified applicator: someone on the contractor’s crew who is a qualified applicator supervising.

All of roadside sprays are considered general property maintenance and are not part of THP process.

Most Tanoak control projects are part of THP and thus have had considerable analysis and assessment.

Some Tanoak control projects are not part of THP and thus require some separate analysis. Most of these involve control of hardwood to release existing good conifer stocking, which minimizes the cost and focus on most effective use of investments; this tends to average 50 acres per year.

From “SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries”:

“Chemical herbicide application would be accomplished according to the herbicide label following all applicable federal, state, and local regulations. Copies of Material Safety Data Sheets (MSDS) are maintained at the regional

offices. TCF uses contractors for the application of all herbicides, which are ground and aerially applied. Contractors that apply chemicals are responsible for specific components of the application process that are contained in the Site Preparation Contract or equivalent.”

2.2.4. The World Health Organization (WHO) type 1A and 1B pesticides shall be prohibited, except where no other viable alternative is available.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** The list of pesticides applied across all sites included only Arsenal, Garlon, Roundup PRO, Oust XP, and Imazapyrid. None of these are included on the World Health Organization (WHO) list of type 1A and 1B pesticides.

**2016:** The Forest Operations Manager annually reviews the list of World Health Organization (WHO) type 1A and 1B pesticides to ensure that they are not used. He also reviews the list of pesticides banned under the Stockholm Convention on Persistent Organic Pollutants (2001) shall be prohibited.

North Coast Forest Conservation Program: Chemicals used in past years are not on the prohibited list.

2.2.5. Use of pesticides banned under the Stockholm Convention on Persistent Organic Pollutants (2001) shall be prohibited.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** The list of pesticides applied across all sites included only Arsenal, Garlon, Roundup PRO, Oust XP, and Imazapyrid. None of these are banned under the Stockholm Convention on Persistent Organic Pollutants (2001)

**2016:** The Forest Operations Manager annually reviews the list of World Health Organization (WHO) type 1A and 1B pesticides to ensure that they are not used. He also reviews the list of pesticides banned under the Stockholm Convention on Persistent Organic Pollutants (2001) shall be prohibited.

North Coast Forest Conservation Program: Chemicals used in past years are not on the prohibited list.

CFI, Georgia: Active forest management is used. No pests identified on site.

2.2.6. Use of *integrated pest management* where feasible.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** North Coast California: Policies, pesticide application records, observations of mechanical release/Tanoak cutting.

Cranberry Lake Tract, New York: Treatments solely for invasive control using Round-up – Accord formulation for control of Japanese knotweed and Rodeo formulation for control of common reed (allowed for use in wetlands).

**2016:** From “SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries”:  
 “Forest health is monitored by Forest Operations Manager/Forestry Consultants and specific prescriptions are implemented to enhance forest health. Integrated pest management (IPM) is used to reduce chemical use and lower costs. For example, thinning operations are scheduled to prevent loss of growth as well as maintain stands in a vigorous and healthy condition. Pre-commercial thinning is scheduled for overstocked stands. Federal and state forestry agencies complete aerial reconnaissance when the threat of certain insects warrants. The standard strategy for controlling SPB outbreaks is cutting infected areas and thinning the adjacent stand, thus eliminating the need for pesticides.”

Sansavilla Tract, Georgia: The consulting forester periodically arranges a flight for aerial reconnaissance, looking for pine foliage that is off-color, indicating possibly bark-beetle infestations. Foresters and other persons involved on this property also observe conditions when traveling on the ground. When dying trees are found a close inspection is done, followed by treatment, generally by a sanitation/salvage harvest.

North Coast California:

Most Tanoak control projects are part of THP and thus have had considerable analysis and assessment.

Some Tanoak control projects are not part of THP and thus require some separate analysis. Most of these involve control of hardwood to release existing good conifer stocking, which minimizes the cost and focus on most effective use of investments; this tends to average 50 acres per year.

Chemical treatment is the last-resort in all cases, and not applied widely.

2.2.7 Supervision of forest chemical applications by state- or provincial-trained or certified applicators.

- N/A   
  Conformance   
  Exceeds   
  O.F.I.   
  Major NC   
  Minor NC

Audit Notes: **2017:** North Coast California:

Contract "Redwood Resources\_Spray\_GRF BR" for the 2017 Jubata grass and French broom treatment areas (map included) requires the Contractor (Redwood Resources) to provide The Conservation Fund documentation of required licenses.

Cranberry Lake Tract, New York: Chemicals applied by Licensed Herbicide Applicator Z. Simek, a TNC Employee.

**2016:** Sansavilla Tract, Georgia: Confirmed that applicator LB&S Air, Inc. has license.

Connecticut and Vermont: No chemical use recently, but reserve option for invasive control.

North Coast Forest Conservation Program:

Reviewed a copy of pesticide application contract and record: Certified applicators: Redwood Resources are hired to apply chemicals. Madison Thompson has a Qualified Applicators License.

2.2.8. Use of management practices appropriate to the situation, for example:

- a. notification of adjoining landowners or nearby residents concerning applications and chemicals used;
- b. appropriate multilingual signs or oral warnings;
- c. control of public road access during and immediately after applications;
- d. designation of streamside and other needed buffer strips;
- e. use of positive shutoff and minimal-drift spray valves;
- f. aerial application of forest chemicals parallel to buffer zones to *minimize* drift;
- g. monitoring of water quality or safeguards to ensure proper equipment use and *protection* of streams, lakes and other water bodies;
- h. appropriate transportation and storage of chemicals;
- i. filing of required state or provincial reports; and/or
- j. use of methods to ensure *protection of threatened and endangered species*.

- N/A   
  Conformance   
  Exceeds   
  O.F.I.   
  Major NC   
  Minor NC

Audit Notes: **2017:** North Coast California: "Herbicide Policy Updated 10.31.16"

The following is a list of guidelines that are to be followed with FOLIAR herbicide applications:

- All applications must be by a licensed pesticide applicator with a good safety track
- record and in compliance with EPA-approved label recommendations.
- Detailed contract specifications shall be provided to minimize risk of over- application or misapplication.
- Indicator dye will be used to enable better monitoring, and applications areas will be
- flagged in advance,
- No foliar herbicides will be applied within 50' of neighborhood property lines.
- Work will be closely supervised by TCF staff or consulting foresters.
- Notification signs will be posted in logical locations at least 30 days prior to applying herbicides.
- Records on all applications will be compiled by TCF staff, submitted to the county and available upon request.
- The effectiveness of treatments will be monitored by TCF staff.

There will be no herbicide application in Class I, II or IV WLPZs or within 25 feet of a class III watercourse.

Cranberry Lake, Wisconsin: Per records reviewed for 3 treatments, documented on "Fountains Forestry Herbicide Application Information Sheet": Grasse River Tract; Cranberry Lake Tract; Tooley Pond Tract.

Other properties in the working forest fund: "Our general prescription is for each consultant to avoid chemical use wherever possible. When it is used, we follow all labels and use lowest rates possible to accomplish the required benefit. All labels are followed for handling and application, mixing, storage, transport, etc. We document the volume and type of chemicals used and the areas treated. Only licensed and certified applicators are used, and these applicators are managed by our consulting foresters. All MSDS sheets are kept on file."

**2016:** Sansavilla Tract, Georgia: Interviews confirmed careful planning and application consistent with the indicator.

North Coast California: Herbicides sites are posted; confirmed the posting sign verbiage: "Advisory: This area will be treated with herbicide on or about (DATE)."

Herbicide Application and Hardwood Management Policy For The Conservation Fund's North Coast Forest Conservation Program: Various precautions are taken with all herbicide applications to ensure that adverse impacts to the environment and human health are minimized. The following is a list of guidelines that are to be followed with all herbicide applications:

1. All applications must be by a licensed pesticide applicator with a good safety track record and in compliance with EPA-approved label recommendations.
2. Work orders will include detailed contract specifications (to minimize risk of over-application or misapplication).
3. Indicator dye will be used to enable better monitoring, and applications areas will be flagged in advance,
4. No herbicides will be applied within 50' of neighborhood property lines.
5. Work will be closely supervised by TCF staff or consulting foresters.
6. Notification signs will be posted in logical locations at least 30 days prior to applying herbicides.
7. Records on all applications will be compiled by TCF staff and available upon request.
8. The effectiveness of treatments will be monitored by TCF staff.

**Performance Measure 2.3**

*Program Participants* shall implement forest management practices to protect and maintain forest and soil *productivity*. Indicators:

2.3.1. Process to identify soils vulnerable to compaction, and use of appropriate methods, including the use of soil maps where available, to avoid excessive soil disturbance.

- N/A  
  Conformance  
  Exceeds  
  O.F.I.  
  Major NC  
  Minor NC

Audit Notes: **2017:** Twin Lakes Tract, Wisconsin: Foresters walk and assess the proposed harvest site as part of pre-harvest planning before developing timber harvest prescriptions. Implementation including regular, documented inspections during sale administration supports a finding of an effective program to protect soils from excessive disturbance.

Cranberry Lake Tract, New York: Same as above; also, foresters managing this tract have managed it for 14 years and have learned capabilities of soils, sites, and roads.

**2016:** From "SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries": "The Forest Operations Manager/Forestry Consultants are knowledgeable of the soils and site conditions on the properties they manage. Where available, the stand maps contain soils information and a corresponding soils data base that are available to all Forest Operations Manager/Forestry Consultants as they plan future forest management activities."

Jamaica, Vermont: The tract's management plan includes information on Site Class: II (from soils information and field examination) and the Soils Mapping Unit. Foresters review harvest blocks to plan harvests, considering appropriate season, equipment, access and yarding roads, and techniques.

Sansavilla Tract, Georgia: The Sansavilla Tract Management Plan specifies the use of modified mechanized harvesting equipment such as low-pressure skidders equipped with dual tires if there is risk of significant soil compaction, and the use of shovel logging systems under extremely wet conditions.

North Coast California: Foresters walk and assess every acre of land before completing Timber Harvest Plans, pre-harvest planning, regulatory programs, and implementation including sale administration comprise an effective program to protect soils from excessive disturbance.

2.3.2. Use of erosion control measures to *minimize* the loss of soil and site *productivity*.

- N/A  
  Conformance  
  Exceeds  
  O.F.I.  
  Major NC  
  Minor NC

Audit Notes: **2017:** Cranberry Lake Tract, New York: No erosion was observed, and effective erosion control measures were in place, including use of logging slash spread on roads as well as piled into water bars.

Twin Lakes Tract, Wisconsin: No erosion was observed, and erosion control measures were in place.

**2016:** Sansavilla Tract, Georgia: No erosion was noted on any of the numerous sites inspected.

North Coast Forest Conservation Program: Numerous effective waterbars per BMPs were observed in all locations where they would be needed.

Success Pond, New Hampshire: No erosion was observed, effective use of waterbars viewed and erosion control measures were in place.

CFI, Georgia; Success Pond, New Hampshire: SMZs flagged and painted prior to harvesting. Confirmed in field. Verified communication between loggers and consultants.

2.3.3. Post-harvest conditions conducive to maintaining site *productivity* (e.g., limited rutting, retained down woody debris, *minimized skid trails*).

N/A  Conformance  Exceeds  O.F.I.  Major NC  Minor NC

Audit Notes: **2017:** North Coast California: Observed post-harvest conditions support strong conformance. On the Olsen Gulch THP one unit being closed out had insufficient water bars, but these were noted by TCF's forester who instructed the supervisor to have them rebuilt to standard. All water bars on accepted, closed units were acceptable.

Cranberry Lake Tract, New York: Observed extensive use of logging slash spread on roads as well as piled into water bars, and minimal rutting.

Twin Lakes Tract, Wisconsin: Limited rutting was observed.

CFI, Georgia; Success Pond, New Hampshire: Confirmed in field.

**2016:** Jamaica, Vermont: Post-harvest conditions included limited rutting, ample retained down woody debris, and planned skid trails minimizing impacts.

Sansavilla Tract, Georgia: The Conservation Fund has a policy to use the state BMPs which have guidelines to prevent erosion. These are routinely and systematically applied. Site Retained down woody debris and minimized skid trails were observed in all harvest areas. Some scattered minor rutting was observed, but within acceptable limits. No other issues were observed.

North Coast Forest Conservation Program: Observed limited rutting, retained down woody debris, minimized skid trails.

2.3.4. Retention of vigorous trees during partial harvesting, consistent with scientific silvicultural standards for the area.

N/A  Conformance  Exceeds  O.F.I.  Major NC  Minor NC

Audit Notes: **2017:** Twin Lakes Tract, Wisconsin: Marked stands and stand that was recently harvested both demonstrated conformance. The first priority of harvesting hardwood stands is the removal of poor quality trees.

Cranberry Lake Tract, New York: Same as above. Auditor walked major portions of completed and marked harvests and confirmed appropriate silviculture and removal of least-vigorous or older trees.

North Coast California: Logging quality at all but one portion of one site was very good, with little residual damage. Some residual damage was observed by auditors in Stand 5 of the Ironing Board THP, a closed-out harvest on the Big River Forest, near milepost 4. The damage was greatest along a cable-yarding corridor. Staff explained that this resulted from insufficient deflection to keep the logs off of the ground by the logging contractor. Bark damage was significant to the extent that the health and growth of damaged trees was noticeably affected. Since this condition was detected at only one location

CFI, Georgia; Success Pond, New Hampshire: Confirmed in field.

**2016:** Sansavilla Tract, Georgia: Vigorous trees were retained in stands that had shelterwood establishment harvests.

**2017, 2016:** North Coast Forest Conservation Program: The single tree and group selection harvests to manage for Redwood and Douglas Fir are the most commonly used silvicultural treatments on the forests. Active and completed harvests reviewed showed that these prescriptions were appropriate for the sites and forests and were consistently applied well, and that vigorous trees were retained. A very low percentage of residual trees were damaged during harvests, particularly considering the steep slopes, the nature of the sprout redwood clumps being thinned, and the somewhat high residual stocking in portions of the harvested stands.

2.3.5. Criteria that address harvesting and site preparation to protect soil *productivity*.

N/A  Conformance  Exceeds  O.F.I.  Major NC  Minor NC

Audit Notes: **2017:** TCF has developed a robust policy to address rutting during timber harvests and the foresters understand the criteria (length and depth of rutting) while still learning the nuances of its intended implementation. The 2016 Opportunity for Improvement was only an issue for properties not part of the North Coast California project. Interviews with loggers and foresters/consultants confirmed understanding of policy. Confirmed in the field.

**2016:** Jamaica Tract, Vermont

There is an Opportunity for Improvement in the clarity of criteria to address rutting during timber harvests.

North Coast Forest Conservation Program: California’s Forest Practice rules and the North Coast Policy Digest 8/14/2015 specify the criteria. In addition, all Timber Harvest Plans written for The Conservation Fund include provisions 14CCR916.9(k) Year-Round Logging Road and 14CCR916.9(l) Extended Wet Weather Period

Sansavilla Tract, Georgia: Not reviewed.

2.3.6. Road construction and skidding layout to *minimize* impacts to soil *productivity*.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** All harvests are planned by foresters who are trained and experienced with sale layout. They assess each site to determine the location of the landing and the layout of main skid trails to minimize impacts. Foresters encourage loggers to maintain wide trail spacing.

North Coast California: “Maintaining the road infrastructure is also critical to our ability to move through the forests for log hauling, stream restoration projects, botanical surveys and northern spotted owl surveys. A significant portion of the money we make through timber and carbon sales is re-invested in road infrastructure improvements.

The Garcia River Forest is subject to the Garcia River TMDL Action Plan. The Conservation Fund has ten years to bring all roads into compliance, and has made significant progress towards meeting this mandate, evidenced by many completed road upgrades, monitoring results, and observed conditions.

All properties: Confirmed in the field.

**2016:** Jamaica Tract, Lot 770, Vermont: Foresters worked with the owner of the adjoining tract to secure access across that tract, minimizing the extent of roads and potential impacts of roads for both owners.

Sansavilla Tract, Georgia: Careful road planning, construction, and maintenance was evident.

North Coast Forest Conservation Program: Careful road planning, construction, and maintenance were evident. Foresters have reviewed and use the new Handbook of Forest, Ranch and Rural Roads by RCD/PWA.

**Performance Measure 2.4**

*Program Participants* shall manage so as to protect forests from damaging agents, such as environmentally or economically undesirable wildfire, pests, diseases and *invasive exotic plants and animals*, to maintain and improve *long-term forest health, productivity* and *economic viability*. Indicators:

2.4.1. *Program* to protect forests from damaging agents.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** Cranberry Lake Tract, New York: Limited herbicide use for invasive species removal, done by The Nature Conservancy under contract, to control Phragmites and knotweed. Confirmed records of 2017 herbicide treatments.

California forests, Cranberry Lake, Twin Lakes: Foresters are aware of major pests. Control of forest stocking and removal of least-vigorous trees are the main methods used to manage forest health. Redwood forests of California are quite resilient, although some mortality of Sugar pine from drought followed by bark beetles was pointed out by Chief Forester.

**2016:** Jamaica Tract, Vermont: Foresters demonstrated awareness of important insect and fungal pests.

Sansavilla Tract’s Management Plan has a section on Invasive Species Control: “Evaluation of the tract for invasive species was performed in conjunction with various site visits. Any invasive species found will be noted, mapped and monitored along with other forest management activities. If an invasive has been found to have spread and is causing extreme competition with native habitat, control measures will be incorporated into the management plan to prevent further spread.”

North Coast Forest Conservation Program: Forests are managed to control stocking and foresters spend considerable time in all forests regularly and use this time to monitor forest health. There are few pests of redwood. Timber Harvest Plans (THPs) include Section 15 “Pests” describing any portions of the THP where the Cal. Board of Forestry and Fire Protection has declared a Zone of Infestation or Infection.



2.4.2. Management to promote healthy and productive forest conditions to *minimize* susceptibility to damaging agents.

N/A  Conformance  Exceeds  O.F.I.  Major NC  Minor NC

Audit Notes: **2017:** Control of forest stocking and removal of least-vigorous trees are the main methods used to manage forest health. Inventory information and practices described in management plans, supported by interviews and observations indicate that stands which are (the most) overstocked are prioritized for treatment.

**2016:** Jamaica Tract, Vermont: Foresters who are trained and knowledgeable regarding forest health issues assess each stand, develop prescriptions, and implement them, mostly through marked partial harvests. The completed harvest on Stand 1, Lot 770 has appropriate stocking for maintaining vigorous growth, with most trees remaining having vigorous crowns and minimal signs of decay or insects. Exceptions included trees that are left for wildlife, and beech trees infested with scale insects and having signs of nectria infection, for which there is currently no cost-effective treatment.

Sansavilla Tract, Georgia: The forest is kept healthy and productive by monitoring stands, thinning regularly, and acting as needed to limit impacts and spread of pine beetles by timely sanitation/salvage harvests. One small bark beetle pocket was observed; this is being monitored and response actions are under development. No other forest insect or disease problems were observed, consistent with a similar statement in the tract management plan.

North Coast Forest Conservation Program: Active forest management and monitoring of forest conditions are used to promote healthy forests. Inspected pre-commercial thinning to improve forest health and productivity. Foresters are quite well-informed about forest insects and diseases.

2.4.3. Participation in, and support of, fire and pest prevention and control *programs*.

N/A  Conformance  Exceeds  O.F.I.  Major NC  Minor NC

Audit Notes: **2017:** Wisconsin and New York: Foresters are aware of pest problems and use information from state pest programs.

North Coast California: Review of the Logging Contract for Ironing Board THP, Big River (THP Number 1-16-103 MEN) between The Conservation Fund and Robert Piper confirmed clause 16 and its several sub-clauses require many practices that are in support of fire prevention. Inspections at active harvest sites confirmed that fire kits containing fire-fighting equipment were in place as required.

**2016:** Sansavilla Tract, Georgia:

Site 6 was a 6-acre wild fire on August 23, 2016, 3.6 acres on The Conservation Funds lands. Forester for Joe James Consulting was called to the active fire by the Georgia Forestry Commission and provided information and logistical support. Reviewed the Georgia Forestry Commission (GFC) Wildfire Data Record. GFC has wildfire detection and control systems and is responsible for protecting commercial forestland throughout Georgia.

North Coast Forest Conservation Program: "Annual update of Fire Plan submitted to CalFire and coordination with local Volunteer Fire Departments." Source: North Coast Annual Activity Report 8.31.15. Planning and activities are reviewed each year in a meeting that includes all of the large landowners in Mendocino County and CalFire

Scott Kelly chairs the Mendocino County Cooperative Aerial Fire Patrol, a privately-funded fire patrol used by several local landowners. TCF pays an annual fee to support this effort.

**Performance Measure 2.5**

Program Participants that deploy improved planting stock, including varietal seedlings, shall use best scientific methods. Indicator:

2.5.1. *Program* for appropriate research, testing, evaluation and deployment of *improved planting stock*, including *varietal seedlings*.

N/A  Conformance  Exceeds  O.F.I.  Major NC  Minor NC

Audit Notes: **2017:** Wisconsin and New York: N/A, trees are not planted.

**2016:** Jamaica Tract, Vermont: N/A, trees are not planted.

Information was provided for the Sansavilla Tract, Georgia regarding appropriate development and testing of containerized seedlings of Longleaf and Slash Pine that are used. Improvement programs focus on improving growth rates and rust resistance.

North Coast Forest Conservation Program: No use of improved forest stock, but interviews confirmed that trees planted are grown from locally-collected seed.

### Objective 3 **Protection and Maintenance of Water Resources**

To protect the water quality of rivers, streams, lakes, *wetlands* and other water bodies through meeting or exceeding *best management practices*.

#### Performance Measure 3.1

*Program Participants* shall meet or exceed all applicable federal, provincial, state and local water quality laws, and meet or exceed *best management practices* developed under Canadian or U.S. Environmental Protection Agency–approved water quality *programs*.

Indicators:

3.1.1. *Program* to implement federal, state or provincial water quality *best management practices* during all phases of management activities.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017, 2016:** The use of professional foresters to plan and oversee harvests, timber sale contracts with provisions to follow BMPs, pre-harvest meetings between foresters and logging contractors, sale supervision and weekly checklists (reviewed by loggers in cases where there are contract violations), post-harvest inspections of all sites, and review of all harvest sites by TCF’s Operations Forester comprise the program.

**2017:** North Coast California: Interviews of LTOs (loggers) and of foresters confirmed regular inspections. Reviewed the Logging Contract for Ironing Board THP, Big River (THP Number 1-16-103 MEN).

Cranberry Lake, Wisconsin: BMP monitoring as part of the formal “Harvesting Inspection Report” on Contract ST17-1 Cranberry.

3.1.2. Contract provisions that specify conformance to *best management practices*.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** North Coast California: North Coast California: Review of the Logging Contract for Ironing Board THP, Big River (THP Number 1-16-103 MEN) between The Conservation Fund and Robert Piper confirmed clauses requiring compliance with THP provisions. In California the THP is essentially a site-specific BMP plan; these are quite robust and demanding.

Working Forest Fund (Wisconsin, NY, NH, Georgia): Confirmed that the standard timber sale contract includes a provision that specifies use of BMPs.

Also confirmed BMP provisions in several executed contacts:

- Contract ST17-1 Cranberry (Daniel Lyndaker and Sons); Daniel Lyndaker and Sons are NY State Logger Training (NYLT) trained. (Cranberry Lake tract, NY)
- Contract Number TCF-SLS-2016-1, Copper Peak Timber Sale: Clause 12 b (BMPs); Twin Lakes, Wisconsin

**2016:** Confirmed provision for the Jamaica Tract, Vermont: Timber sale Contract Number: TCF\_Redstart\_2015-01. Sansavilla Tract, Georgia: Contract Number: 08262016 (shelterwood cut, stop 4, Stand 831) includes requirements to follow BMPs and for training, which are found in Appendix A Contract Provisions (Clause 1 for BMPs, Clause 3 for QLP logger training).

North Coast Forest Conservation Program: Requires adherence to THP which comprises the California equivalent of BMPs.

3.1.3. Monitoring of overall *best management practices* implementation.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** Confirmed monitoring for the Twin Lakes, Wisconsin tract by reviewing the timber sale inspection sheet for the Copper Peak Timber Sale Contract Number TCF-SLS-2016-1

Also reviewed monitoring forms for the Cranberry Lake, New York and the CFI, Georgia tracts.

**2016:** Confirmed monitoring for the Jamaica Tract, Vermont by reviewing the timber sale inspection sheet for the harvest completed in the winter of 2016: Timber sale Contract Number: TCF\_Redstart\_2015-01.

Sansavilla Tract, Georgia: Monitoring forms include BMPs

North Coast Forest Conservation Program: RPFs employed by the company monitor all activities and keep good records of such.



**Performance Measure 3.2**

*Program Participants* shall implement water, wetland and riparian protection measures based on soil type, terrain, vegetation, ecological function, harvesting system, state *best management practices (BMPs)*, provincial guidelines and other applicable factors. Indicators:

3.2.1. *Program* addressing management and protection of rivers, streams, lakes, wetlands, other water bodies and riparian areas during all phases of management, including the layout and construction of roads and skid trails to maintain water reach, flow and quality.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

**Audit Notes:** **2017:** North Coast California: California Forest Practices Act rules require on each side of Class 1 stream a 35-foot no cut buffer and maintenance of 80% canopy cover the next 70 feet. Confirmed these buffers along all significant streams observed during stops and while driving through extensive portions of Big River and Garcia River tracts. For some streams in the (managed) Ecological Reserves the protections are effectively even broader, encompassing major portions of watersheds. Overall exceptionally strong conformance was balanced by one area of concern that was determined to be worth noting as an informal observation. Two of three culverted crossings examined along Olsen Gulch Road in the Garcia River Forest had “bed load” sediment build-up behind the trash racks at the upstream inlets. Additionally, staff acknowledged that trash racks had not been installed correctly. Water passage through the culverts was not significantly impeded; however, the build-up of material presents a potential source of sediment discharge into the streams and further contributes to the ability for the culverts to efficiently move water, particularly in high-volume storm events.

All other tracts: Field observations support finding of conformance.

**2017, 2016:** The use of BMPs, the design of all harvest projects by trained foresters, and the review of all projects by supervisory personnel, as well as the policy of strict adherence to the regulatory programs of the respective states (where applicable) comprise such a program. Strong conformance was observed in the field at all sites.

**2016:** Sansavilla Tract, Georgia: Confirmed that printed and GIS maps show wetlands and waterbodies. Interviews and review of documents confirmed these statements from the Sansavilla Tract Management Plan:

- “Prior to each harvest a pre-harvest planning process and report will be completed. This form will describe the post-activity condition, the silvicultural system to be used, an evaluation of the current environment, safeguards, stakeholder input, and all other requirements.”
- “Prior to all other significant forest management activities, an activity planning process and report will be completed, addressing, as applicable, all of the information listed in the bullet point above and any additional issues that must be addressed, such as burn permit number/permission for prescribed burning and species and planting density for tree planting.”

North Coast California: The program has a strong focus on riparian protection and restoration, which was confirmed via review of written THPs that includes significant riparian buffers, on-site review of active and completed THPs, and review of stream restoration work. For example, “California Fisheries Restoration Grant Program, Grant Number P1410517 – Graphite Creek Sediment Reduction and Habitat Enhancement Project” documents a project in Graphite Creek that was visited by the audit team. This project involves the removal of debris associated with a legacy (pre-TCF ownership) road-associated landslide from this fish-bearing stream, anchoring of in-stream structures, and the stabilization of the site.

3.2.2. Mapping of rivers, streams, lakes, wetlands and other water bodies as specified in state or provincial *best management practices* and, where appropriate, identification on the ground.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

**Audit Notes:** **2017, 2016:** Maps accurately depict the wetland and water features, and buffer areas for these are also marked on the ground prior to treatment.

**2017:** North Coast California: THP maps for sites viewed.

Twin Lakes Tract, Wisconsin: Confirmed by review of electronic and printed GIS-based maps

Cranberry Lake Tract, New York: Confirmed by review of electronic and printed maps including those associated with the management plan and with timber harvest plans.

**2016:** Jamaica Tract, Vermont: Confirmed by review of GIS maps on computers and printed maps.

Sansavilla Tract, Georgia: Confirmed by review of GIS maps on computers and printed maps.

North Coast Forest Conservation Program: Confirmed by review of GIS maps on computers and printed maps, including the many maps included in Timber Harvest Plans.

3.2.3. Document and implement plans to manage and protect rivers, streams, lakes, *wetlands*, other water bodies and *riparian areas*.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017; 2016:** North Coast California: Field observations confirmed protection of these features, including use of buffers, care taken to design proper stream crossings and to stabilize them following completion of work. Roads are well-designed and maintained.

Twin Lakes Tract, Wisconsin: Riparian buffers were observed on inspected harvested tracts and planned tracts as appropriate.

Success Pond, New Hampshire: Riparian buffers viewed at multiple sites and confirmed protection of riparian and water bodies. Multiple stream crossings were viewed, all properly designed and stabilized/closed out following use.

CFI, Georgia: Confirmed in field.

**2017:** Cranberry Lake Tract, New York: Appropriate painted/flagged riparian buffers were observed on harvested tracts and planned tracts inspected (see site notes). These included flagging out of small, low wet areas within general sale area. This later practice is particularly important on this tract given the number of small, pocket wetlands and the amount of precipitation in this region.

**2016:** Jamaica Tract, Vermont: riparian buffers were observed on the harvested tract.

Sansavilla Tract, Georgia: Buffers were observed on sales near small ditches. For the Altamaha River the map of "The Conservation Fund Sansavilla, GA – Past, Present, and Future Harvests" shows a very large buffer between planned and completed harvests and the river.

Interviews and review of documents confirmed this statement from the Sansavilla Tract Management Plan: "Prior to each harvest a pre-harvest planning process and report will be completed. This form will describe the post-activity condition, the silvicultural system to be used, an evaluation of the current environment, safeguards, stakeholder input, and all other requirements."

3.2.4. Plans that address wet-weather events in order to maintain water quality (e.g., *forest inventory* systems, wet-weather tracts, definitions of acceptable operating conditions).

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** Twin Lakes Tract, Wisconsin: Forester interview indicated awareness of the need to maintain water quality.

Cranberry Lake Tract, New York: Frequent inspections by foresters and notes showing awareness of weather and the need to work around wet seasons, supplemented by comments during interviews showed that foresters maintain control over loggers. The recently-revised rutting criteria are part of the system; foresters mentioned that these requirements are so tight as to restrict options, but did not seem to be fully aware of the flexibility built into the policy.

**2017; 2016:** North Coast Forest Conservation Program: Site impacts are closely monitored. THPs specify season of harvest. California's Forest Practice rules and the North Coast Policy Digest 8/14/2015 specify the criteria. In addition, all Timber Harvest Plans written for The Conservation Fund include provision 14CCR916.9(l) Extended Wet Weather Period

**2016:** Jamaica Tract, Vermont: frequent inspections by foresters and notes showing awareness of weather and the need to work around wet seasons.

Sansavilla Tract, Georgia: Confirmed that the Georgia "BMP" manual provides general guidelines. Managers have the authority and responsibility to halt logging activities.

Confirmed this statement from the Sansavilla Tract Management Plan: "Prior to each harvest a pre-harvest planning process and report will be completed. This form will describe the post-activity condition, the silvicultural system to be used, an evaluation of the current environment, safeguards, stakeholder input, and all other requirements."

## Objective 4 Conservation of Biological Diversity

To manage the quality and distribution of *wildlife habitats* and contribute to the *conservation of biological diversity* by developing and implementing *stand-* and *landscape-level* measures that promote a diversity of types of *habitat* and successional stages, and the *conservation* of forest plants and animals, including *aquatic species, as well as threatened and endangered species, Forests with Exceptional Conservation Value, old-growth forests* and ecologically important sites.

### Performance Measure 4.1

Program Participants shall conserve biological diversity. Indicators:

4.1.1. Program to incorporate the *conservation of native biological diversity*, including species, *wildlife habitats* and ecological community types at *stand* and *landscape* levels.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** The Conservation Fund’s management at the stand and landscape-level is exemplary in the degree to which the conservation of native biological diversity is factored into all forest management actions.

The Conservation Fund has been a leader in efforts to permanently protect key properties identified through a sophisticated analysis. All management activities on key tracts are planned with biodiversity conservation as the highest priority. Other “plain vanilla” tracts do not receive as much biodiversity planning or analysis. The program relies on its “forestry digest” in general and on SFI Forest Management Program, The Conservation Fund (TCF) and Subsidiaries, TCF-SFI-04 in particular, for most aspects of biodiversity protection during management of its Working Forest Fund properties. Evidence was provided regarding training for staff on the procedure, but consultants are expected to read this document on their own. **Auditors should continue to test the knowledge of consulting foresters regarding this “forestry digest” procedure.**

WFF Impact Metrics Presentation, slide 4 provides the number of “Unique Natural Heritage Elements on All Properties” including those listed as rare, threatened, or endangered: 49 Unique Natural Communities, 75 Plant Species, and 82 Animal Species.

North Coast California:

Reviewed protections for Northern Spotted Owl (NSO). By law, the responsible RPF must prepare a timber harvest plan (THP) disclosing the presence and location of any listed species and mitigate any possible impacts on the species and their habitat. For NSO measures include mapping/flagging as needed a 100-acre core no-cut area and following seasonal restrictions within 0.7-mile radius.

Twin Lakes Tract, Wisconsin; Cranberry Lake Tract, New York, CFI, Georgia; Success Pond, New Hampshire: Reviews of Threatened and Endangered Species documented in management plans, knowledge of foresters and managers, other aspects of program as described in notes under Objective 4.

Underrepresented Land Cover Types by Property:

Twin Lakes Tract, Wisconsin: None

Cranberry Lake Tract, New York: One

**2016:** Jamaica Tract, Vermont is managed within the context of the larger landscape.

Sansavilla Tract, Georgia: The property was purchased by The Conservation Fund to help conserve and protect it from development. It was identified by conservation planners with Georgia DNR’s Non-game Wildlife Division and with TNC as a critical property to acquire and protect. The Georgia State Wildlife Action Plan identifies this region, the Altamaha River Corridor, Gopher Tortoise habitat protection, and the management of the Longleaf Pine-Wiregrass ecosystem as important to prevent further loss of biodiversity. The project to purchase and provide permanent conservation protection and forestry efforts to improve habitat for Gopher Tortoises by restoring forests to appropriate species and forest structures are exemplary.

The North Coast Forest Conservation Program was founded on the basis of comprehensive landscape assessment and conservation planning, and has incorporated stand and landscape level species, habitat management, and community protections into all aspects of land protection and management. Many examples of the program’s effective work in this regard over the past 9 years were seen, discussed, or reviewed in documents. Details are provided in many of the following indicators within Objective 4.

4.1.2. Development of criteria and implementation of practices, as guided by regionally based *best scientific information*, to retain *stand-level wildlife habitat* elements such as snags, stumps, mast trees, down woody debris, den trees and nest trees.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** There is an Opportunity for Improvement in awareness of the importance of hollow portions of trees having potential as dens or habitat providing shelter (Twin Lakes Tract).

Twin Lakes Tract, Wisconsin: Foresters are aware of the importance of wildlife trees, with particular emphasis on retaining standing snags were possible. After some additional questions the forester acknowledged the importance of hollow portions of trees having potential as dens or habitat providing shelter. In some areas of marked stands most or all such trees were marked for removal.

Cranberry Lake Tract, New York: Foresters are aware of the importance of wildlife trees, with particular emphasis on retaining standing snags were possible. Hollow/potential den trees are retained in the significant “no cut” buffers and excluded areas, and some of these trees are also left within areas subject to harvesting as well.

CFI, Georgia; Success Pond, New Hampshire: Confirmed in field.

**2016:** Sansavilla Tract, Georgia: Vigorous trees were retained in stands that had shelterwood establishment harvests.

Sansavilla Tract, Georgia: Vigorous trees were retained in stands that had shelterwood establishment harvests.

Jamaica Tract, Vermont: Criteria are in the management plan; wildlife trees are left uncut, and where necessary are marked for retention; foresters demonstrated strong awareness of wildlife habitat features and values of various species.

Sansavilla Tract, Georgia: The current emphasis is on converting Loblolly Pine to Longleaf Pine and Slash Pine. Loblolly Pine is an aggressive self-seeding species, so retention of Loblolly Pine trees would result in more undesirable seedlings and a greater need for the use of herbicides. Snags and hardwood trees are retained, but most retention is along edges and riparian corridors.

North Coast Forest Conservation Program: TCF’s large tree retention policy per the revised language from the Option A is an exceptional approach to retain *stand-level wildlife habitat* elements. Source: Summary of Option A 1.16.14: “3.4 Wildlife Trees, Recruitment Trees, and Snags

Target: Four wildlife trees per acre on average across a stand. Trees shall be retained from any of the following groups until a minimum of four trees per acre have been identified. The following criteria have been developed to assist field foresters to recruit suitable wildlife trees.

- Snags: Retain all snags, (all should be retained but only those greater than 18-inch DBH and 20-foot height shall count towards the retention targets).
- Conifers greater than 48-inch DBH: Retain a minimum of two and not more than four per acre for recruitment if present (unless old growth).
- Old-growth trees: Retain all old growth. Old growth is defined as any conifer tree greater than 200 years old that exhibits outward signs of being old or decadent: such as rounded or flat crown, dead top, excessive branching, or platy bark.
- Raptor nest trees (active or likely to be re-used): Retain all.
- Any hardwood except tanoak: Retain all.
- Tanoak: Retain all tanoak 20” and greater unless site specific conditions exist as justified by the project forester.
- Murrelet habitat trees: Retain all. Typically, large diameter Douglas-fir or other conifer with at least one mossy branch platform capable of supporting an egg: at least 6” in diameter, nearly horizontal, within the canopy of the stand but lower than the surrounding tree tops within 100’ radius, covered directly above by at least 50% canopy, and allowing ready flight access and landing paths.
- Den trees: Retain all den trees which are defined as trees which have a cavity greater than three inches in diameter and greater than ten feet above ground.
- Trees with basal hollows or other significant features: Retain all trees with basal hollows defined as trees with significant burn scars protruding 1/3 or more into the bole of the tree, as well as retain all trees with acorn granaries, significant or unusual lichen accumulation, signs of deformity, decadence, unusual bark patterns, or other unique structure or features, e.g. large excessive branching or flat tops.

The following language is used in the Option A, reconciling a past inconsistency: “Retain all tanoak 20” DBH and larger. These large hardwoods are of the highest value to wildlife because they tend to be the most prolific mast

producers and they possess more desirable structural attributes than smaller trees. Exceptions to the general retention guidelines may be adopted on sites with very high numbers of large tanoaks if retention of all 20" and greater tanoak will not result in sufficient sunlight and growing space for young conifers."

- 4.1.3. Document diversity of *forest cover types* and age or size classes at the individual ownership or forest tenure level, and where credible data are available, at the *landscape* scale. Working individually or collaboratively to support diversity of *native forest cover types* and age or size classes that enhance *biological diversity* at the *landscape* scale.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017, 2016:** Most properties have been assessed for their ability to contribute to the protection of representative sample areas (RSAs) for protection or conservation of unique and under-represented native community types. In many cases there are no opportunities to protect communities thought to be under-represented. For example, in California the protections in place on the TCF tracts supplemented by many protected areas in the larger landscape provide very high levels of protection. Protected areas are designated freely, with ecological forestry practices implemented to support ecological protections and to restore, develop, and/or maintain biodiversity.

**2017:** CFI, Georgia; Success Pond, New Hampshire: CFI Tract Management Plan. Confirmed in field.

**2016:** Sansavilla Tract, Georgia: Inventory and management plan document forest cover types and age or size classes at the individual ownership level.

North Coast Forest Conservation Program: Option A, individual plans, and analyses in each THP provide the documentation. The entire program was started to enhance and protect biological diversity at the landscape scale, with consideration for listed species with large ranges or for anadromous fish.

- 4.1.4. *Program Participants* shall participate in or incorporate the results of state, provincial, or regional *conservation* planning and priority-setting efforts to conserve biological diversity and consider these efforts in forest management planning. Examples of credible priority-setting efforts include state *wildlife* action plans, state forest action plans, relevant *habitat conservation* plans or provincial *wildlife* recovery plans.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** North Coast California: During planning, including development of THPs and special habitat projects, planners/managers/biologists/foresters consult the California Natural Diversity Database to ensure protection of rare, threatened, and endangered species and their habitats.

North Coast Forest Conservation Conference <https://sonomalandtrust.org/events/forest-conference-2017.html> was attended by Forester and one Forestry Technician.

Success Pond, New Hampshire: Harvest plans consider and note both Lynx and Marten habitat.

CFI, Georgia: The acquisition and management of this property were based on the development and restoration of Longleaf pine systems, in part to further the protection and enhancement of habitat for the Gopher Tortoise. The CFI Tract Management Plan incorporates the objectives of GA DNR, which will likely be the ultimate owner. Confirmed in field.

**2017, 2016:** David Whitehouse has downloaded the relevant State Wildlife Action Plans to The Conservation Fund SharePoint site.

Jamaica Tract, Vermont: Interviewed consultants regarding the Vermont State Wildlife Action Plan, confirming awareness and knowledge. The plan includes information on habitats for species of concern, augmenting information obtained through the state's ANR database.

2015 Notes: There is an Opportunity for Improvement in the efforts to incorporate information from wildlife action plans in NH and Vermont into forest management plans.

New Hampshire/Vermont (LVI): TCF personnel are engaging with Alexi, PhD. Candidate Researcher who gets grants from NHF&G, WMNF, and the USFWS regarding Lynx and Snowshoe Hare and for Pine Martin.

The Success Pond plan's HCVF and RSA analysis indicates that an understanding of the habitat needs and regional status of the American marten are incorporated into the plan.

North Coast Forest Conservation Program: TCF has developed most of its program on the basis of regional ecologically-focused assessments and plans. Conservation Prospects for the North Coast: *A Review and Analysis of Existing Conservation Plans, Land Use Trends and Strategies for Conservation on the North Coast of California* provides a collection and synthesis of all of the conservation plans developed for the north coast.

4.1.5. Program to address conservation of known sites with viable occurrences of significant species of concern.

N/A   
  Conformance   
  Exceeds   
  O.F.I.   
  Major NC   
  Minor NC

Audit Notes: **2017, 2016:** The Conservation Fund’s efforts to manage special sites and significant species of concern are exemplary.

North Coast California:

During planning, including development of THPs and special habitat projects, planners/managers/biologists/foresters consult the California Natural Diversity Database to ensure protection of rare, threatened, and endangered species and their habitats.

TCF has implemented several major in-stream habitat restoration/protection projects. Auditors observed some of the logs placed as part of one “Large Woody Debris accelerated recruitment “project with work completed in 2013; these logs appear to be functioning as intended, providing structure needed to cause the stream to scour pools, helping move stream habitat towards the desired conditions that are closer to the natural range of variability. This project is described in “Two Log Creek Large Woody Debris Project - 2014 Final Report.”

Working Forest Fund Guidelines Digest, Updated July 2015, “Habitat Conservation:

The Conservation Fund directs all forest consultants to ensure that the habitat for any known Threatened and Endangered Species (TES) or plant community of Special Concern (SC) on Working Forest Fund properties is not significantly altered by forest management activities. All forest management plans shall define habitat areas for these species and define steps to protect them. In the creation of these plans, the consultant will check with the state Natural Heritage Program and if TES or SC species are found, they will develop a habitat management plan. In addition, consideration will be given to other non-threatened wildlife in the development of management and harvest plans.”

**2017:** CFI, Georgia:

The acquisition and management of this property were based on the development and restoration of Longleaf pine systems, in part to further the protection and enhancement of habitat for the Gopher Tortoise. Gopher Tortoise burrow are identified and preserved during silviculture operations. TCF works in conjunction with GA DNR to identify and protect burrows. Confirmed in field. TCF identified one instance of a logger not following the protection protocol through their internal non-conformance process.

**2017 & 2016:** New Hampshire/Vermont (LVI): Property-wide botanical surveys have been completed on the Success Pond, McConnell Pond, and Bald Cap properties (Engstrom Natural Resources Inventory report). On Success Pond Osprey nests, a loon, and two species of plants were identified, mapped, and designated for protection by buffering

North Coast Forest Conservation Program: The HCVF/RSA analysis has identified four areas for protection: a) Oak woodlands and grasslands; b) Pygmy cypress forest; c) Old growth coniferous forest; and d) Salmonid spawning streams.

Program On High Conservation Value Forests, Imperiled Species, and Representative Sample Areas.

The Conservation Fund’s North Coast Forest Conservation Program. Primary author: Evan Smith. Original version December, 2008; expanded September 2010, 2011, 2012, 2014.

Previously reviewed the TCF report “Conservation Prospects for the North Coast: a review and analysis of existing conservation plans, land use trends, and strategies for conservation on the North Coast of California.”

“Conservation Prospects” systematically identifies the highest conservation values for the region based on a broad set of past conservation plans and develops recommendations for future conservation efforts. The two principal recommendations are to:

- Move quickly to establish “working landscape” conservation management on large, strategically located forest and agricultural properties in resource-rich watersheds in Humboldt, Mendocino and Del Norte counties.
- Focus other fee or easement acquisitions on unique resources that are essential to conserving high-priority coastal resources, such as coastal estuaries, old-growth redwood forest stands, Coho salmon refugia, floodplains, and California Coastal Trail segments.”

North Coast Forest Conservation Program Policy Digest, August 2010 Revised September 2015

“Conservation Action Planning” section of the Garcia River Management Plan further describes efforts for landscape and property-level analysis of cover types and habitats.



This is also covered in the HCVF memo in the North Coast Forest Conservation Program Policy Digest

4.1.6. Identification and *protection of non-forested wetlands*, including bogs, fens and marshes, and *vernal pools* of ecological significance.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017, 2016:** The Conservation Fund exceeds the standard by employing exceptional efforts to identify non-forested wetlands and ensure their protection.

**2017:** North Coast California: Few such areas exist in this ecosystem.

All other properties: Foresters are aware of the need to protect such features. No impacts were observed.

**2016:** Jamaica Tract, Vermont: wetlands and watercourses were buffered out of the timber sale (Contract Number: TCF\_Redstart\_2015-01).

North Coast Forest Conservation Program: Foresters identify such sites on maps and often flag them off from active harvest areas. Confirmed by field observations at all sites visited.

Sansavilla Tract, Georgia: Wetlands of any type are excluded from harvest and treatment.

4.1.7. Participation in *programs* and demonstration of activities as appropriate to limit the introduction, spread and impact of *invasive exotic plants and animals* that directly threaten or are likely to threaten *native* plant and animal communities.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** Field sites and interviews confirmed that foresters are aware of invasive species and implement control measures when warranted and feasible.

**2017, 2016:** North Coast Forest Conservation Program: Observed Pampas grass along roadsides in many locations. Discussed efforts to control, including use of herbicide (glyphosate) and hand-pulling. Either method requires repeated treatment; hand-pulling is particularly challenging. Due to concerns of neighbors, The Conservation Fund has agreed not to use herbicides in the Salmon Creek Forest. Instead an annual project is done to pull Pampas grass, with some success beginning to become apparent.

Herbicide Application and Hardwood Management Policy for the Conservation Fund’s North Coast Forest Conservation Program: “Herbicides are also used for the control of invasive exotics but other methods such as manual removal are also employed. Specifically, on Salmon Creek; French Broom and Jubata Grass are removed annually by hand with the volunteer cooperation of the Salmon Creek Project Team. In areas with extreme infestations of exotics such as those found on Big River, we believe that herbicide application is the safest and most cost-effective alternative for the control of those species. Reduction in the use of herbicides over time is an important objective for The Conservation Fund and alternatives to herbicide treatments have been, and will continue to be, evaluated. In addition, we will strive to stay informed as new research becomes available related to the efficacy and environmental impacts of various herbicides. The following document has been prepared to outline our herbicide application and use policies to control tanoak and exotic invasive species on the north coast forest properties.”

**2016:** Jamaica Tract, Vermont: Foresters are aware of the potential invasive species, describing woody invasives as less-challenging than the top three described: Garlic mustard, Common reed, and Japanese knotweed.

Sansavilla Tract, Georgia:

Sansavilla Tract Management Plan includes a section on Invasive Species Control: “Evaluation of the tract for invasive species was performed in conjunction with various site visits. Any invasive species found will be noted, mapped and monitored along with other forest management activities. If an invasive has been found to have spread and is causing extreme competition with native habitat, control measures will be incorporated into the management plan to prevent further spread.”

4.1.8. Consider the role of natural disturbances, including the use of prescribed or natural fire where appropriate, and *forest health* threats in relation to *biological diversity* when developing forest management plans.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** CFI, Georgia: Natural fire is used for the restoration of the Longleaf Pine ecosystem. Confirmed in field.

**2017, 2016:** North Coast Forest Conservation Program: Natural disturbance ecology is a key factor in the development of management strategies and individual treatment plans. For example, the selection system (single-

tree and group) is used in nearly all harvests, consistent with the scientific understanding of the ecology of redwood forests.

**2016:** Jamaica Tract, Vermont: The silvicultural approach described in the management plan and implemented in the harvest in Stand 1 is based on disturbance ecology, with a combination of single-tree and group-selection harvests used to emulate single-tree death/blowdown and more substantial wind-damage.

Sansavilla Tract, Georgia: The management plan and all harvests to date are directed towards restoring fire and fire-dependent communities including Longleaf Pine on the sandier upland sites and Slash Pine on the lower, wetter sites. Prescribed fire has been extensively implemented and will be a regular feature of management here.

## Performance Measure 4.2

Program Participants shall protect threatened and endangered species, Forests with Exceptional Conservation Values (FECV) and old-growth forests. Indicators:

4.2.1. Program to protect threatened and endangered species.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** CFI, Georgia:

Gopher Tortoise burrow are identified and preserved during silviculture operations. TCF works in conjunction with GA DNR to identify and protect burrows. Confirmed in field. TCF identified one instance of a logger not following the protection protocol through their internal non-conformance process.

Twin Lakes Tract, Wisconsin; Cranberry Lake Tract, New York; Success Pond, New Hampshire: Reviews of sources of information on Threatened and Endangered Species are documented in management plans. Old-growth forests are not present. The program relies on its “forestry digest” in general and on SFI Forest Management Program, The Conservation Fund (TCF) and Subsidiaries, TCF-SFI-04 in particular, for most aspects of biodiversity protection during management of its Working Forest Fund properties. Auditors should continue to test the knowledge of consulting foresters regarding this latter procedure.

North Coast California: “North Coast Forest Conservation Initiative - 2016 Annual Review”: “The placement of large wood in streams and maintaining and upgrading our road infrastructure to reduce future sediment delivery is a high priority for salmon habitat restoration.” Project examples:

- Mainstem Garcia Sediment Reduction and Habitat Enhancement Project, Garcia River Forest
- Graphite Creek Sediment Reduction and Habitat Enhancement Project, Garcia River Forest
- East Branch Little North Fork Big River Large Wood Debris (LWD) and Instream Barrier Modification Project: 60 streamside trees and removal of 800 cubic yards of historic landslide debris
- In 2016 the sediment source assessment was completed on the Gualala River Forest, which will be used to facilitate road upgrading and decommissioning projects beginning with the Signal Creek watershed in 2017

**2016:** Sansavilla Tract, Georgia: The acquisition and management of this property has a goal of protection and enhancement of habitat for the Gopher Tortoise (*Gopherus polyphemus*) which is Federally Threatened in the western portion of its range and is a candidate species for possible listing later under the ESA and a state species of concern in Georgia. The Conservation Fund is working closely with TNC and the Nongame Conservation Section, Wildlife Resources Division Georgia Department of Natural Resources in this project.

**2017, 2016:** North Coast Forest Conservation: The acquisition and management of all 5 parcels are in large measure driven by habitat protection and enhancement needs of Endangered and Threatened species including

- Coho salmon (*Oncorhynchus kisutch*) - Federally Endangered
- California red-legged frog (*Rana draytonii*) - Federally Threatened
- Steelhead (*Oncorhynchus mykiss*) - Federally Threatened
- Northern Spotted Owl (*Strix occidentalis caurina*) - Federally Threatened

Extensive surveying of owl locations and understanding of their behavior on the Garcia River, Salmon River, Big River and Gualala River tracts provides an example of effective information gathering to manage wildlife habitat.

The aquatic inventory and monitoring efforts by The Nature Conservancy are a key part of the strategy to manage salmonid habitat on the Garcia Tract. The Ecological Reserve Network on this tract also supports protection of T&E species and their habitat.

Plant surveys are conducted prior to development of all THPs.



4.2.2. Program to locate and protect known sites flora and fauna associated with viable occurrences of *critically imperiled* and *imperiled* species and communities also known as *Forests with Exceptional Conservation Value*. Plans for protection may be developed independently or collaboratively, and may include *Program Participant* management, cooperation with other stakeholders, or use of easements, *conservation* land sales, exchanges, or other *conservation* strategies.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** North Coast Forest Conservation: During planning, including development of THPs and special habitat projects, planners/managers/biologists/foresters consult the California Natural Diversity Database to ensure protection of rare, threatened, and endangered species and their habitats.

CFI, Georgia: During acquisition the NatureServe database and other sources are used to verify the occurrence of FECV on the property. Gopher Tortoise burrow are identified and preserved during silviculture operations. TCF works in conjunction with GA DNR to identify and protect burrows. Confirmed in field.

Success Pond, New Hampshire: Conservation easement for the entire property is in the final stages of approval by the State of New Hampshire. Full easement provided for review.

**2017, 2016:** From "SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries": "TCF intends to purchase new properties of high conservation value and find an appropriate long-term owner that will manage the properties to meet conservation objectives, or manage the Working Forest Fund properties for conservation and income until a conservation easement can be placed."

**2016:** Sansavilla Tract, Georgia: Confirmed map "Sansavilla Tract G1G2 Communities and Species identified by GA Natural Heritage" and spreadsheet listing G1 and G2 species. "Hits" are mostly off the tract or in the portion of the tract along the Altamaha River that is reserved from harvest and will be permanently protected using easements/fee sale to the U.S. and/or the State of Georgia.

North Coast California: Easements on the Buckeye Forest (see notes under SFI Indicator 12.1.3) and the Garcia River Forest.

FSC High Conservation Value Forest (HCVF) and Representative Sample Area (RSA) plans include G1 and G2 species and communities addressed in the SFI Standard. Property-wide botanical surveys have been completed. For the North Coast Forest Conservation Program prior to timber harvesting specific botanical surveys are conducted and included in the Timber Harvesting Plans.

4.2.3. Support of and participation in plans or programs for the conservation of *old-growth forests* in the region of ownership or forest tenure.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** Success Pond, New Hampshire: Property historically has been in forest management. No old-growth forests exist on the property. Confirmed in field.

CFI, Georgia: Property historically has been in forest management. No old-growth forests exist on the property. Confirmed in field. The acquisition and management of this property were based on the development and restoration of Longleaf pine systems, in part to further the protection and enhancement of habitat for the Gopher Tortoise.

**2017; 2016:** North Coast Forest Conservation Program: Interviews and documents reviewed, including the North Coast Policy Digest, indicated that all old-growth forests and legacy trees are protected. Major portions of the forests are being managed to mimic late successional stage forests or are being left uncut to allow stands to develop into older growth stages on their own. On on-going harvest in one such "Managed Reserve" was reviewed and practices to develop large-trees and late-seral conditions were confirmed. Redwood trees larger than 48 inches and fir larger than 30 inches are not cut.

**2016:** Sansavilla Tract, Georgia: There are no old-growth stands. All bottomland hardwood stands are protected from harvest, and some of these stands are older.

### Performance Measure 4.3

*Program Participants* shall manage ecologically important sites in a manner that takes into account their unique qualities. Indicators:

4.3.1. Use of information such as existing natural heritage data or expert advice in identifying or selecting ecologically important sites for *protection*.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017, 2016:** The Conservation Fund exceeds the standard by conducting comprehensive on-site surveys to select ecologically important sites for protection.

**2017:** North Coast Forest Conservation Program: TCF contracts with botanists to conduct botanical surveys, and conducts other surveys using contractors and/or trained employees. TCF also works with partner organizations to obtain data and scientific information that supports efforts to conserve biodiversity.

CFI, Georgia; Success Pond, New Hampshire: During acquisition the NatureServe database and other sources are were to determine the occurrence of FECV on the property.

**2016:** Sansavilla Tract, Georgia: The acquisition and management of this property has a goal of protection and enhancement of habitat for the Gopher Tortoise (*Gopherus polyphemus*) which is Federally Threatened in the western portion of its range and is a candidate species for possible listing later under the ESA and a state species of concern in Georgia. The Conservation Fund is working closely with TNC and the Nongame Conservation Section, Wildlife Resources Division Georgia Department of Natural Resources in this project, and these partners have conducted extensive surveys.

North Coast Forest Conservation Program: TCF works with partner organizations to obtain data and scientific information that supports efforts to conserve biodiversity. Examples:

- “2015 salmonid habitat surveys for East Branch Little North Fork Big River & Laguna Creek” conducted by The Coastal Watershed Planning and Assessment Program (CWPAP) is a California Department of Fish and Wildlife (CDFW) as confirmed by review of “The Conservation Fund—Mendocino County Forestlands - Permit to Enter / Release of Liability and Indemnity / Key Issue Record”.
- “Botanical Resources of the Gualala River Forest: An Assessment - Mendocino County, California”, September, 2013, Geri Hulse-Stephens and Kerry Heise

4.3.2. Appropriate mapping, cataloging and management of identified ecologically important sites.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** CFI, Georgia: During acquisition the NatureServe database and other sources are used to determine the occurrence of FECV on the property. Burrows were seen and the field and are shown on maps.

Success Pond, New Hampshire: During acquisition the NatureServe database and other sources are used to determine the occurrence of ecologically important site on the property, viewed in GIS and on maps.

**2017, 2016:** The Conservation Fund’s partners, contractors, and employees use information from heritage databases or from specialists. This information is incorporated into GIS as layers which are routinely used during planning, operations, and monitoring activities. Locations of important sites, including Legacy Trees and rare, threatened, or endangered animals, plants, and natural communities, are determined using field GPS units and their locations and general attributes are recorded in the GIS.

North Coast California: Madison Thompson uses field tools (iPad equipped with ArcCollector) and office systems (ArcGIS on-line) to collect field data including data on ecologically important sites, initially as part of THP development, but ultimately to build the comprehensive database.

California Fisheries Restoration Grant Program, Grant Number P1410517 – Graphite Creek Sediment Reduction and Habitat Enhancement Project.

### Performance Measure 4.4

*Program Participants* shall apply knowledge gained through research, science, technology and field experience to manage *wildlife habitat* and contribute to the *conservation of biological diversity*. Indicators:

4.4.1. Collection of information on *Forests with Exceptional Conservation Value* and other *biodiversity*-related data through *forest inventory* processes, mapping or participation in external *programs*, such as NatureServe, state or provincial heritage *programs*, or other credible systems. Such participation may include providing non-proprietary scientific information, time and assistance by staff, or in-kind or direct financial support.

N/A   
  Conformance   
  Exceeds   
  O.F.I.   
  Major NC   
  Minor NC

**Audit Notes:** **2017:** North Coast California: During planning, including development of THPs and special habitat projects, planners/managers/biologists/foresters consult the California Natural Diversity Database to ensure protection of rare, threatened, and endangered species and their habitats.

All properties: TCF staff and consulting foresters use data from the heritage programs to determine presence of FECVs and RTE species and communities.

**2016:** Jamaica Tract, Vermont: Interviews confirmed awareness of tools for information on FECVs. TCF staff and consulting foresters use data from the heritage programs of New Hampshire and Vermont to guide conservation planning and the development of management plans and site-level plans. The organization has a sophisticated GIS and employees with GIS skills.

2015 Notes, Vermont and New Hampshire: Harvest maps and other maps depicting locations of RTE species or communities were reviewed and discussed with foresters and managers.

Sansavilla Tract, Georgia: The Georgia State Wildlife Action Plan identifies this region, the Altamaha River Corridor, Gopher Tortoise habitat protection, and the management of the Longleaf Pine-Wiregrass ecosystem as important to prevent further loss of biodiversity. Project partner organizations TNC and Georgia DNR employ the specialists who determine conservation status of state-listed species and communities, in association with G1-G2 listings. The Sansavilla Tract Management Plan includes maps with locations of G1-G2 species and communities, several of which are nearby and some which are in the protected river corridor portion of the tract.

North Coast Forest Conservation Program:

TCF works with partner organizations to obtain data and scientific information that supports efforts to conserve biodiversity. One example involves “2015 salmonid habitat surveys for East Branch Little North Fork Big River & Laguna Creek” conducted by The Coastal Watershed Planning and Assessment Program (CWPAP) is a California Department of Fish and Wildlife (CDFW) as confirmed by review of “The Conservation Fund—Mendocino County Forestlands - Permit to Enter / Release of Liability and Indemnity / Key Issue Record”.

FSC High Conservation Value Forest (HCVF) and Representative Sample Area (RSA) plans include G1 and G2 species and communities addressed in the SFI Standard. Property-wide botanical surveys have been completed. For the North Coast Forest Conservation Program prior to timber harvesting specific botanical, biology and fisheries surveys are conducted and included in the Timber Harvesting Plans.

4.4.2. A methodology to incorporate research results and field applications of *biodiversity* and ecosystem research into forest management decisions.

N/A   
  Conformance   
  Exceeds   
  O.F.I.   
  Major NC   
  Minor NC

**Audit Notes:** **2017:** North Coast California: An adaptive approach is clearly embedded, with considerable implementation monitoring and effectiveness monitoring in place that is some of the most-robust such effectiveness monitoring in effect in private forestry in the U.S.

“NORTHERN SPOTTED OWL LIFE HISTORY AND HABITAT INFORMATION” cites supporting scientific research, and the synthesis demonstrates a mechanism to use research to support decisions and to monitor and mitigate impacts.

CFI, Georgia: Management of the property adjacent to the Bullard WMA is managed for the creation of the Longleaf Pine ecosystem. Management is conducted in cooperation with GA DNR. Confirmed in field.

**2016:** Sansavilla Tract, Georgia: Partner organizations TNC and Georgia DNR are very-well staffed with biologists, botanists, and other scientists.

North Coast Forest Conservation Program: Feedback from outside experts, agency personnel and consultants contribute to active and adaptive management on all five tracts included in the North Coast Program. In partnership with The Nature Conservancy and others, TCF has implemented an array of monitoring and formal research efforts designed to learn, over time, the best ways to restore and/ or manage for biodiversity concurrent with other social and economic objectives on these lands. The program has developed a superb adaptive management approach to forest management and conservation.

**Objective 5 Management of Visual Quality and Recreational Benefits**

To manage the visual impact of forest operations and provide recreational opportunities for the public.

**Performance Measure 5.1**

*Program Participants* shall manage the impact of harvesting on *visual quality*. Indicators:

5.1.1. Program to address visual quality management.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017, 2016:** All harvests, road building projects, and vegetation treatments are planned and overseen by professional foresters who have training in visual quality. Trained foresters develop timber harvest plans and oversee implementation including visual practices. Trained loggers are involved in all harvests.

**2016:** Sansavilla Tract, Georgia, Management Plan “Aesthetics– See guidelines provided to contractors prior to activity.”

5.1.2. Incorporation of aesthetic considerations in harvesting, road, landing design and management, and other management activities where visual impacts are a concern.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017, 2016:** Field observations confirmed that visual impacts management considerations are employed.

CFI, Georgia; Success Pond, New Hampshire: Logging decks were located away from roads and transportation routes.

**2017:** North Coast California: Harvest sites reviewed were located in interior portions of large tracts, with limited visibility from outside the lands. Exclusive use of selection treatments, most removing one-quarter or fewer of the trees, ensured conformance. Yarding sites (landings) are cleared of debris upon completion. Scattered old culverts were noted; the Timberlands Manager waits until there is a full truckload before arranging trucking to Oakland for sale as scrap. There was minimal scattered trash seen; the system of gates and access control has been effective at limiting dumping. Logging operations were neat and well-organized. The harvesting contract includes these clauses to manage appearance: 6. Cleaning of Debris; 7. Removal of Equipment.

**2016:** Jamaica Tract, Vermont: The completed harvest was done professionally, with little damage to residual trees, care taken to lop logging slash, which was scattered in the woods and not concentrated near roads, trails, or landings, and with a stable road system left. Winter logging helped minimize impacts.

Sansavilla Tract, Georgia: While this property is undergoing significant harvesting activity, particularly on the upland portion, the harvests are being done with thorough utilization and timely reforestation. The property is within a heavily-forested part of southern Georgia with a significant forest products industry. Harvesting guidelines provided to contractors prior to activity. There is some use of shelterwood harvests to accomplish habitat objectives for the Gopher Tortoise without having to clearcut in all cases.

North Coast California: Foresters avoid putting in group selection groups close to public roads.

In the Salmon Creek property foresters work closely with community members to understand and address their concerns about the visual impacts of management practices.

Refer to the Opportunity for Improvement to update the Garcia Forest Management Plan

The Garcia Management Plan includes “the following measures will be considered, subject to budget constraints, when harvesting adjacent to forest roads”, but most of these measures are costly and not often implemented (underlined portions are implemented):

- Clean landings---blade landings clean of debris, crush/spread debris on nearby skid trails, remove all human litter, skid cull logs back into the woods.
- Lop slash---to within 30” of the ground within view from landings and truck roads, including upper portion of cable corridors.
- Seed bare ground---such as roadsides, landings, and visible skid trail approaches with native grasses, erosion control mixes or plant with conifer. (Done where required by forestry regulations).
- Promote view corridors----by selective hardwood/brush/conifer removal and/or pruning to create open vistas from roads.
- When constructing new roads---avoid vertical bank cuts, taper where feasible; minimize soil movement; remove or hide unsightly stumps and logs.

- Maintain open grasslands free of slash and debris.

**Performance Measure 5.2**

*Program Participants* shall manage the size, shape and placement of clearcut harvests. Indicators:

5.2.1. Average size of clearcut harvest areas does not exceed 120 acres (50 hectares), except when necessary to meet regulatory requirements, achieve ecological *objectives* or to respond to *forest health* emergencies or other natural catastrophes.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017, 2016:** North Coast California: Clear-cuts are not done on these properties.

Success Pond, New Hampshire: No clear-cuts completed on the property.

CFI, Georgia: Clearcuts are used to remove other species as part of approach to restoring Longleaf Pine. Field observations show that the 120-acre limit is met.

**2016:** Vermont tracts managed by Red Start Consulting: Clearcuts are not done on these properties.

Sansavilla Tract, Georgia: Total Harvest Acres 2,526; Average Clearcut Harvest Acres = 84.2

5.2.2. Documentation through internal records of clearcut size and the process for calculating average size.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017, 2016:** North Coast California: Clear-cuts are not done on these properties.

Success Pond, New Hampshire: No clear-cuts completed on the property in recent years. Confirmed in the GIS and per interview, that if they are implemented, size will be well under the 120 acres, due to the nature of the species types and will be tracked in the GIS.

**2016:** Vermont tracts managed by Red Start Consulting: Clearcuts are not done on these properties.

Sansavilla Tract, Georgia: See above.

North Coast Forest: Clearcuts are not done on these properties.

**Performance Measure 5.3**

*Program Participants* shall adopt a *green-up requirement* or alternative methods that provide for *visual quality*. Indicators:

5.3.1. *Program* implementing the *green-up requirement* or alternative methods.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017, 2016:** Confirmed in the field at all locations audited.

North Coast Forest Conservation: California RPFs plan and oversee all harvests. Extensive use of selection silviculture and the THP process ensure that SFI green-up requirements are met.

**2017:** Twin Lakes Tract, Wisconsin; Cranberry Lake Tract, New York: Foresters or equivalent plan and oversee all harvests, and these generally involve partial harvests.

Success Pond Tract, New Hampshire: Clear-cuts are completed in limited amounts on these properties. Foresters follow the USFS green-up requirements.

**2016:** Vermont tracts managed by Red Start Consulting: Clear-cuts are not done on these properties; partial harvesting systems are used, with single-tree and group selection the main prescription.

Sansavilla Tract, Georgia: Licensed Professional Foresters or equivalent plan and oversee all harvests. Evidence of a well-considered planting program was provided. Planted trees grow rapidly on this tract.

5.3.2. Harvest area tracking system to demonstrate conformance with the *green-up requirement* or alternative methods.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** Success Pond Tract, New Hampshire:

Opportunity for Improvement: The program could better document and quantify the regeneration on harvest sites to demonstrate conformance with the green-up requirement.

The Monitoring Plans noted in the Multiple Resource Management Plan for Success Pond Tract states that “after harvests are completed, they will be inspected at least once per year for the next two years, and reports will be included in quarterly reports”. Per interview, a visual inspection occurs and if problems are viewed, this would be

noted in quarterly reports and appropriate post-harvest taken. While there was no evidence in the field to show that the green-up requirement is not being followed, there is not a defined harvest area tracking system to demonstrate conformance with the *green-up requirement* or alternative methods.

**2017, 2016:** Sansavilla Tract, Georgia: GIS, printed maps, records, and field work during sale set up.

North Coast Forest Conservation: Not needed due to use of selection silviculture. California RPFs plan and oversee all harvests.

**2016:** Vermont tracts managed by Red Start Consulting: Clearcuts are not done on these properties.

5.3.3. Trees in clearcut harvest areas are at least 3 years old or 5 feet (1.5 meters) high at the desired level of stocking before adjacent areas are clearcut, or as appropriate to address operational and economic considerations, alternative methods to reach the *performance measure* are utilized by the *Program Participant*.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** Twin Lakes Tract, Wisconsin; Cranberry Lake Tract, New York; Success Pond, New Hampshire: No clearcuts were observed or visited.

CFI, Georgia: This property was recently acquired. Plans are in place to regenerate as part of efforts to restore a significant portion of the tract to Longleaf Pine.

**2016:** Vermont tracts managed by Red Start Consulting: Clearcuts are not done on these properties.

Sansavilla Tract, Georgia: Buffers between clearcuts include riparian/ditch corridors.

North Coast Forest Conservation: No clearcutting

#### Performance Measure 5.4

*Program Participants* shall support and promote recreational opportunities for the public. Indicator:

5.4.1. Provide recreational opportunities for the public, where consistent with forest management *objectives*.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017, 2016:** The Conservation Fund exceeds the standard by providing public recreational opportunities throughout the forests it owns and manages.

**2017:** North Coast California: “North Coast Forest Conservation Initiative - 2016 Annual Review” item Community Outreach: Number of participants in the Pedestrian and Equestrian Stewardship Access Program on Salmon Creek, Big River = 15; Public tours = 10.

CFI, Georgia: Land adjacent to the Bullard WMA is leased to the GA for wildlife management. Other parts are leased to a hunting club.

TCF consults local stakeholders and key partners when developing long-term recreation access plans. For example, for its Cranberry Lake, NY tract TCF has continued leasing small tracts to several hunting clubs and is working with the State of New York, Department of Conservation on a long-term arrangement that will allow the clubs to continue this traditional use as part of a permanent, working-forest conservation easement, but in a way that also will allow for public hunting as well. The tract will be open to many other types of recreation, including hiking, canoeing, kayaking, berry-picking and snowmobiling.

WFF Impact Metrics PowerPoint Slide 22 “Hunting Access” lists 9 tracts which privately lease hunting rights and 21 tracts for which hunting is open to the public.

WFF Impact Metrics PowerPoint Slide 24 “Trail Miles” by property are listed.

**2016:** Tracts are leased to hunt clubs when possible, more commonly on tracts located in the southern U.S. For example, on the Sansavilla Tract, Georgia there is one hunt club lease. This land will be available for public hunting after it transfers to the Georgia DNR. Most tracts have all or some portions available for public hunting: Twin Lakes Tract, Wisconsin; Success Pond, New Hampshire; all 5 California properties; and CFI, Georgia.

North Coast California: Equestrian use by permit on the Salmon Creek Property; Pedestrian access is allowed on the other four forests. Confirmed process for granting recreation use permits via “The Conservation Fund—Mendocino County Forestlands - Permit to Enter / Release of Liability and Indemnity / Key Issue Record”.



**Objective 6    Protection of Special Sites**

To manage lands that are geologically or *culturally important* in a manner that takes into account their unique qualities.

**Performance Measure 6.1**

*Program Participants* shall identify *special sites* and manage them in a manner appropriate for their unique features. Indicators:

6.1.1. Use of information such as existing natural heritage data, expert advice or stakeholder consultation in identifying or selecting *special sites* for *protection*.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes:    **2017:** North Coast California: Timber Harvest Plans include archeological reviews.

Twin Lakes Tract, Wisconsin and Cranberry Lake Tract, New York; Success Pond, New Hampshire: Heritage data is consulted when management plans are prepared. Cultural features maps are on file.

CFI, Georgia: During acquisition the NatureServe database and other sources are used to verify the occurrence of FECV on the property. Gopher Tortoise burrow are identified and preserved during silviculture operations. TCF works in conjunction with GA DNR to identify and protect burrows. Confirmed in field.

**2017, 2016:** North Coast California: Conformance was clearly demonstrated; see notes under Objective 4 above.

**2016:** Jamaica Tract, Vermont: According the tract’s management plan: “Ecological Significance: This entire property is mapped by the State of Vermont’s Department of Natural Resources as sustaining important black bear habitat. It is not mapped as providing critical deer wintering habitat and no rare, threatened, or endangered species are known to exist here.” The consultant managing tracts in central and southern Vermont uses the Vermont Agency of Natural Resources website to review all tracts for RTE species and communities during the management planning process.

Sansavilla Tract, Georgia: Cultural features map is in the file, supported by a detailed narrative on the history of the tract in the Sansavilla Tract Management Plan. The plan has a map of G1G2 locations on and adjacent to the forest. An in depth-FECV and RTE species and community assessment was conducted” prior to the development of the management plan.

6.1.2. Appropriate mapping, cataloging and management of identified *special sites*.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes:    **2017, 2016:** Conformance was clearly demonstrated across all sites audited. Maps and plans depict all special sites, and often the organization hires specialists to augment information normally available in exiting state-managed databases of ecological, cultural/historic sites; see notes under Objective 4 above.

North Coast California: Property-wide botanical surveys have been completed for all parcels.

**2017:** North Coast California: Contract with Botanist was reviewed, and ongoing botanical surveys are conducted as part of THP planning. Timber Harvest Plans include archeological reviews.

**2016:** Sansavilla Tract, Georgia: The Sansavilla Tract Management Plan includes detailed information about several special sites and maps of G1G2 species; a Cultural Features map is on file.





## Objective 7 Efficient Use of Fiber Resources

To minimize waste and ensure the efficient use of fiber resources.

### Performance Measure 7.1

*Program Participants* shall employ appropriate forest harvesting technology and in-woods manufacturing processes and practices to minimize waste and ensure efficient utilization of harvested trees, where consistent with other *SFI Standard objectives*. Indicator:

7.1.1. *Program* or monitoring system to ensure efficient utilization, which may include provisions to ensure:

- a. management of harvest residue (e.g., slash, limbs, tops) considers economic, social and environmental factors (e.g., organic and nutrient value to future forests and the potential of increased fuels build-up) and other utilization needs;
- b. training or incentives to encourage loggers to enhance utilization;
- c. exploration of markets for underutilized species and low-grade wood and alternative markets (e.g., bioenergy markets); or
- d. periodic inspections and reports noting utilization and product separation.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** North Coast California: Markets are very strong for redwood logs, and improved for other species. Utilization observed on active harvests is good, and foresters regularly inspect harvesting to ensure this. The harvesting contract includes these clauses to manage utilization: 1.4, 1.8, 1.9, 1.10  
Twin Lakes Tract, Wisconsin, CFI Tract, Georgia and Cranberry Lake Tract, New York; Success Pond, New Hampshire: Consulting foresters regularly inspect tracts and complete inspection forms. Contracts include clauses related to full utilization of trees.  
CFI, Georgia: Two stands are currently under contract to rake longleaf pine straw.

**2016:** Jamaica Tract, Vermont: Consulting forester regularly inspects tracts and completes an inspection form.  
Sansavilla Tract, Georgia: Site observations confirmed good utilization of harvested trees. The consulting forester regularly inspects active sales and reviews utilization; a form is used to record these aspects of utilization: complete cutting, stump heights, utilization, log grading, product sorts, market compliance. A section of the Forest Management Forest Management Plan covers "Forest Products Marketing and Timber Harvesting".

**2017, 2016:** North Coast Forest Conservation Program: Foresters understand the markets available and work with loggers to ensure efficient utilization. The forests are all distant from markets, and selling species other than redwood can be challenging at times. Foresters regularly inspect ongoing harvests and review utilization.

## Objective 8 Recognize and Respect *Indigenous Peoples'* Rights

To recognize and respect *Indigenous Peoples'* rights and traditional knowledge.

### Performance Measure 8.1

Program Participants shall recognize and respect Indigenous Peoples' rights. Indicator:

8.1.1. *Program Participants* will provide a written *policy* acknowledging a commitment to recognize and respect the rights of *Indigenous Peoples*.

N/A  Conformance  Exceeds  O.F.I.  Major NC  Minor NC

Audit Notes: **2017; 2016:** From "SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries":

"TCF has a Sustainable Forestry Commitment that contains a provision to recognize and respect Indigenous Peoples' rights. Prior to any planned site disturbing activities, the Forest Operations Manager/Forestry Consultants would access the Bureau of Indian Affairs (BIA) database of recognized tribal entities. The BIA database is available online at: <http://www.indianaffairs.gov/WhoWeAre/RegionalOffices/index.htm>".

Interviewed David Whitehouse who indicated that there are no such tribes near any of the WFF properties.

There are federally-recognized Passamaquoddy Tribal lands in the vicinity of the Maine lands; efforts have been made to make contact.

North Coast California: A list of all tribes that could potentially have an interest in THPs dictated by CalFire is used to send documents about each THP in advance to the tribes to allow them to consider any possible impact on cultural resources.

Each THP includes a confidential section dedicated to cultural resources information (Section 6) with the following sub-sections: Part 1- Project Information; Part 2 – Archeological Records Check Information; Part 3 – Native American Consultation Info; Part 4 – Pre-Field Research; Part 5 – Training and Experience of Archeological Surveyors; Part 6- Survey Methods; Part 7: Survey Results; Part 8 – Evaluation of Significance (for Olsen Gulch "No determination of significance"); Part 9: Protection Measures; Part 10: Meeting with LTO; Part 11 – Site Recording

### Performance Measure 8.2

*Program Participants* with forest management responsibilities on public lands shall confer with affected *Indigenous Peoples* with respect to sustainable forest management practices. Indicator:

8.2.1. *Program* that includes communicating with affected *Indigenous Peoples* to enable *Program Participants* to:

- a. understand and respect traditional forest-related knowledge;
- b. identify and protect spiritually, historically, or culturally important sites;
- c. address the use of non-timber forest products of value to Indigenous Peoples in areas where Program Participants have management responsibilities on public lands; and
- d. respond to Indigenous Peoples' inquiries and concerns received.

N/A  Conformance  Exceeds  O.F.I.  Major NC  Minor NC

Audit Notes: **2017, 2016:** TCF does not have forest management responsibilities on public lands.

### Performance Measure 8.3

*Program Participants* are encouraged to communicate with and shall respond to local *Indigenous Peoples* with respect to sustainable forest management practices on their private lands.

Success Pond Tract, New Hampshire, Opportunity for Improvement: There is an opportunity to improve outreach to other locally recognized indigenous groups referenced in the management plan.

Indicators:

8.3.1. *Program Participants* are aware of *traditional forest-related knowledge*, such as known cultural heritage sites, the use of wood in traditional buildings and crafts, and flora that may be used in cultural practices for food, ceremonies or medicine.

N/A  Conformance  Exceeds  O.F.I.  Major NC  Minor NC

Audit Notes: **2017:** North Coast California: North Coast California: Native American Contact List\_July2016 Q: How was this list used in past year? A: As part of each timber harvest plan submittal, TCF is required to submit an archaeological review of the THP area. For each THP submittal (a few each year), a notice is sent to the list of tribes regarding the

arch sites. A few years ago, the local tribe went out on our Salmon Creek Forest and collected redwood bark to make a tipi.” Picture provided.

Success Pond Tract, New Hampshire: The [Multiple Resource Management Plan](#) for Success Pond Tract identifies four communities of indigenous people in the Success Pond area. TCF has conducted outreach to two of the communities of indigenous people (currently, there are no federally recognized tribes in New Hampshire).

The forest manager could communicate with the other two communities of indigenous people in their consultation to identify sites of current or traditional cultural, archeological, ecological, economic or religious significance.

**2017, 2016:** North Coast California: Influences of native-American practices are described in program documents.

**2016:** Sansavilla Tract, Georgia: The Forest Management Plan for this tract includes a description of the site’s history including pre-colonial times. Partners’ representatives demonstrated considerable knowledge of the tract’s history.

2015 Notes: New Hampshire/Vermont: The management plans for Success Pond and McConnell Pond each have a section “Proximity to Indigenous People Communities” that includes information on the original indigenous people who inhabited the region where these lands are, the status of modern tribes (no federally-recognized tribes nearby), contacts for state-level representatives, and some information on language, history, and culture.

8.3.2. Respond to *Indigenous Peoples’* inquiries and concerns received.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017, 2016:** From “SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries”:

“(If) reservation lands are located adjacent to, or in close proximity with a TCF tract, the Forest Operations Manager/Forestry Consultant would contact the Tribe to determine if there are any cultural heritage sites, flora used in cultural practices for food, or other traditional or cultural resources. Feedback from the Tribes would be documented and a response provided to any concerns received. The Complaints Procedure can be used to address Indigenous Peoples' inquiries and concerns in SFIS 8.3.2.”

**2017:** Not reviewed in further detail during the 2017 audits.

**2016:** TCF has a “Public Inquiries & Official Complaints Procedure (8.3.2,b)” and **foresters and managers are aware of it**

North Coast California: Reviewed the “TCF Complaint Log” and supporting information, confirming that there is a process for receiving, recording, and responding to public inquiries. No concerns have been received from Indigenous Peoples.

## Objective 9 Legal and Regulatory Compliance

To comply with applicable federal, provincial, state and local laws and regulations.

### Performance Measure 9.1

*Program Participants* shall comply with applicable federal, provincial, state and local *forestry* and related social and environmental laws and regulations. Indicators:

#### 9.1.1. Access to relevant laws and regulations in appropriate locations.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** Wisconsin, New York, and New Hampshire: Foresters interviewed were able to describe legal requirements.

North Coast California: Laws available on-line and in printed manuals. Rules are incorporated into THPs.

All parcels: BMP manuals available to consultants.

**2016:** From "SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries": TCF staff have internet access to regulatory agency web sites where they can access the most current versions of relevant laws and regulations." The document includes many relevant web sites including the following categories: federal agencies, Forestry Associations, SFI, state foresters.

Jamaica Tract, Vermont: Foresters have training and experience and are well-connected to the state agencies and NGOs that work on forestry issues.

North Coast California: North Coast Policy Digest 8/14/2015; internet sites; RPF training

Gualala River Forest Integrated Resource Management Plan, Section 4.1.4 Regulatory Setting described the major laws and includes Table 4-1 summarizing "the state and federal environmental laws and regulations that pertain to forest management on the North Coast."

Forest managers and key staff demonstrated clear understanding of the relevant laws. The property manager and the forester who are responsible for forestry on these lands are both California Registered Professional Foresters (RPF) and must demonstrate competence to attain this credential and a record of compliance to maintain it.

#### 9.1.2. System to achieve compliance with applicable federal, provincial, state, or local laws and regulations.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** North Coast California: Auditors observed less-than-ideal conditions regarding dust on roads appurtenant to the active harvest on the Olsen Gulch THP, Garcia River Forest. Several factors combined to cause this situation, including a shortage of operators, and short-term marketing opportunity, limited water available locally in part due to regulations and measures in place to protect fish, and dry weather. Dust abatement measures were observed but could be more effective.

The Conservation Fund employs experienced foresters to plan, layout, obtain permits as needed (THPs, other), and oversee all aspects of forest management, including timber harvests, silviculture projects, stream habitat improvements, and road maintenance. All TCF staff demonstrated knowledge of the laws and regulations that relate to their responsibilities, and demonstrate the desire to comply to the letter and spirit of these legal requirements. The requirements are complex, numerous, and can be challenging to implement in the context of a complex ecosystem management/biodiversity restoration mission.

Some public policy goals and resulting regulations can conflict, compounding the challenges. For example, the management and control of dust from the use of logging roads is complicated by seasonal harvesting restrictions designed to protect soils and water quality, limited availability of experienced workers and of equipment, concerns about the impacts of drafting water from streams for road watering, and concerns about the use of chemicals for dust abatement as well as the cost of road chemical treatment considering the duration of effectiveness. The roads appurtenant to the active harvest on the Olsen Gulch THP, Garcia River Forest on the day the auditors reviewed them had a deep layer of fine, dusty silt powder that was being stirred up by trucks using the road. Water availability limited the extent of the road that could be watered each evening. The THP has spanned several years because of logger availability, seasonal restrictions, and the unusually early start of the rainy season in late September 2016. Dust levels were at problematic levels, and may soon reach legal limits. The Timberlands Manager for TCF was concerned enough to be exploring options with the LTO.

Contracts with professionals (consultants) who provide services and work on TCF’s lands include clauses requiring compliance with environmental laws, follow requirements for spills or hazardous waste, and provide evidence of required licenses. Reviewed signed agreements with: Geri Hulse Stephens –botany;

Mike Stephens—owl surveys; Pacific Watershed Associates—grant funded road restoration

Cranberry Lake, NY: Files for completed harvests included documentation on tax payments: “Forest Law Tax Notice of Commercial Cutting.

All tracts: Foresters and experienced, trained personnel are involved in planning and monitoring of all operations.

**2016:** The “SFI Forest Management Program” states a commitment to regulatory compliance with components:

- 1) a commitment to achieve continuing regulatory compliance;
- 2) contract provisions with landowners and contractors;
- 3) training of appropriate staff and contractors in applicable regulations;
- 4) BMP compliance monitoring by TCF and State Agencies;
- 5) taking corrective and preventive action; and
- 6) management review and continual improvement.”

TCF’s policies and procedures incorporate the laws and regulations of the tract’s locations.

Professional foresters, trained on the organization’s policies, plan and oversee activities.

Plans and proposed harvests are reviewed by the Forest Operations Manager.

9.1.3. Demonstration of commitment to legal compliance through *available regulatory action information*.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** Interviews and web search did not uncover any issues besides one listed below.

CFI, Georgia: GA DNR monitors activity adjacent to Bullard WMA. There was a CAR written for damage to Gopher Tortoise burrows during timber harvesting. Operation was stopped. Remediation steps taken. Remediation was conducted in conjunction with GA DNR. Issue has been resolved.

**2016:** TCF reported no regulatory issues, and none were found in an internet search. Consultants interviewed (Georgia, Vermont) also indicated that there have not been any regulatory issues or finding.

Discussion: Mendocino County has recently added a regulation to specify landowner liability if the owner causes trees to be killed and then these trees are left standing for more than 90 days. The Conservation Fund has used the “hack-and-squirt” technique (which leaves standing dead trees) to meet its ecological restoration objectives in a cost-effective manner. Other landowners with similar forest types and hardwood control challenges have employed this technique widely and successfully. Based on the audit team’s observations of many “hack-and-squirt” projects and on our understanding of the ordinance it does not appear that the continued use of this practice would inevitably result in a violation, and the practice certainly contributes significantly to sustainable forestry. SFI does not require a perfect regulatory record, but expects efforts to remain in conformance. The audit team is not able to make a legal determination. Future audit teams would inquire into any violation issued, allowing the legal process to operate fully before making a determination regarding any findings associated with the possible violations of the county regulation.

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**Performance Measure 9.2**

*Program Participants* shall take appropriate steps to comply with all applicable social laws at the federal, provincial, state and local levels in the country in which the *Program Participant* operates. Indicators:

9.2.1. Written *policy* demonstrating commitment to comply with social laws, such as those covering civil rights, equal employment opportunities, anti-discrimination and anti-harassment measures, workers' compensation, *Indigenous Peoples'* rights, workers' and communities' right to know, prevailing wages, workers' right to organize, and occupational health and safety.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** Briefly reviewed The Conservation Fund Employee Manual Revised August 2016 during the 2017 audits. The manual has not changed.

Employees report that the organization provides a good work environment.

North Coast California: All staff participated in 2017 TCF diversity webinars, and Scott Kelly participated in additional training.

**2016:** The Conservation Fund Employee Manual Revised August 2016.

North Coast Policy Digest 8/14/2015: "Commitment to Safety and Health Operating Policy, The Conservation Fund's North Coast Forest Conservation Program"

Signed copy of Sustainable Forestry Commitment (TCF-SFI-05)

North Coast Policy Digest 8/14/2015 (aka "Forest Management Policies for The Conservation Fund's North Coast Forest Conservation Program") states the commitment to SFI on page 3.

March 2015 workshop on diversity and equity in the work force was attended by many involved TCF staff.

Another workshop in equity, diversity, and inclusion.

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9.2.2. *Forestry enterprises* will respect the rights of workers and labor representatives in a manner that encompasses the intent of the International Labor Organization (ILO) core conventions.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017; 2016:** Interviewed workers to verify respect for their rights; no concerns were raised, and workers interviewed stated high job satisfaction.

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## Objective 10 Forestry Research, Science and Technology

To invest in *forestry* research, science and technology, upon which sustainable forest management decisions are based and broaden the awareness of *climate change* impacts on forests, *wildlife* and *biological diversity*.

### Performance Measure 10.1

*Program Participants* shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners provide in-kind support or funding for forest research to improve *forest health*, *productivity* and sustainable management of forest resources, and the environmental benefits and performance of forest products. Indicators:

10.1.1. Financial or in-kind support of research to address questions of relevance in the region of operations. Examples could include, but are not limited to, areas of forest *productivity*, water quality, biodiversity, community issues, or similar areas which build broader understanding of the benefits and impacts of forest management.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** Working Forest Fund: We have supported a moose study under way on Cranberry Lake, working with Cornell University. Moose study on Success Pond, working with University of New Hampshire. Pending (not started yet): a weather station study area on Brunswick, through N.C.S.U.

**2016:** From "SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries":

The Conversation Fund allows a number of research organizations to conduct research on its properties and thereby provides in-kind support for research. Examples of research:

Monitoring Plan for a Study on Methods of Tanoak Control, Big River Forest, Mendocino County, CA - Inventory Collection Manual and Specifications, June 15, 2015.

10.1.2. Research on genetically engineered trees via *forest tree biotechnology* shall adhere to all applicable federal, state, and provincial regulations and international protocols ratified by the United States and/or Canada depending on jurisdiction of management.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: TCF is not engaged in research on genetically engineered trees. This Indicator is not applicable.

### Performance Measure 10.2

*Program Participants* shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners develop or use state, provincial or regional analyses in support of their *sustainable forestry programs*. Indicator:

10.2.1. Participation, individually and/or through cooperative efforts involving *SFI Implementation Committees* and/or associations at the national, state, provincial or regional level, in the development or use of some of the following:

- a. regeneration assessments;
- b. growth and drain assessments;
- c. *best management practices* implementation and conformance;
- d. *biodiversity conservation* information for family forest owners; and
- e. social, cultural or economic benefit assessments.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** The Conservation Fund's SFI Forest Management Program (TCF-SFI-04) describes two main approaches consistent with the requirement: 1) use of state-level wildlife actions plans, and 2) use of FIA data.

The organization has developed many quantitative metrics for its positive social and economic benefits; a summary presentation "WFF Impact Metrics Presentation" was reviewed.

North Coast California: Each year the North Coast California project publishes an annual report describing environmental, social/cultural and economic impacts/benefits: "North Coast Forest Conservation Initiative - 2016 Annual Review"

**2016:** Not reviewed during the 2016 SFI Audit.



**Performance Measure 10.3**

*Program Participants* shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners broaden the awareness of *climate change* impacts on forests, *wildlife* and *biological diversity*. Indicators:

10.3.1. Where available, monitor information generated from regional climate models on *long-term forest health*, *productivity* and *economic viability*.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** Various website and training presentations are used for monitoring information on regional climate change. Kendall Deleyser, Summer Intern at Chapel Hill assessed some aspects of climate change information in all states where the fund owns land and summarized trends and impacts. A review of the summary presentation showed that the fund has computed the current carbon content of each property, and has made estimates of the “climate resiliency” for each property.

For example, on the Cranberry Lake, NY property there are 322 Vulnerable Acres and Success Pond, NH has 2,398 Vulnerable Acres.

North Coast California: Staff interviewed have a general understanding of climate trends; senior staff are most knowledgeable on the trends.

**2016:** Not reviewed during the 2016 SFI Audit.

10.3.2. *Program Participants* are knowledgeable about *climate change* impacts on *wildlife*, *wildlife habitats* and *conservation of biological diversity* through international, national, regional or local *programs*.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** The TCF Evidence Manual (TCF-SFI-03) refers to research reported by EPA and other agencies: (<http://www.epa.gov/climatechange/effects/forests.html>).

Opportunity for Improvement: Not all field foresters could describe predicted climate change patterns or impacts beyond very general statements.

Auditors asked field staff to describe climate change trends predicted for their regions. Most mentioned warming, but few could describe in any detail other important changes such as predicted changes in patterns, including more-extreme extremes (a commonly-mentioned shorthand description that broadly applies). Senior staff are more conversant than field staff in most cases.

Success Pond, New Hampshire: Consultant forester is aware of impacts of climate change. Species range changes of both flora and fauna are to be expected, as well as changes in local weather patterns and extremes at both ends of the climate. The mix of species and forest types, along with their typical harvest prescriptions, allow for flexibility with changing climate.

CFI, Georgia: TNC and consultant are aware of impacts of climate change.

- Wetter sides drying
- Presence of increased invasive species, insects, and pathogens.
- Shorter planting season may move from bare root to containerized seedlings.
- Hardwood areas may begin to disappear.

**2016:** Not reviewed during the 2016 SFI Audit.

## Objective 11 Training and Education

To improve the implementation of *sustainable forestry* practices through appropriate training and education *programs*.

### Performance Measure 11.1

*Program Participants* shall require appropriate training of personnel and contractors so that they are competent to fulfill their responsibilities under the *SFI 2015-2019 Forest Management Standard*. Indicators:

11.1.1. Written statement of commitment to the *SFI 2015-2019 Forest Management Standard* communicated throughout the organization, particularly to facility and woodland managers, and field foresters.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017, 2016:** Signed copy of Sustainable Forestry Commitment (TCF-SFI-05)

North Coast Policy Digest 8/14/2015 (aka "Forest Management Policies for The Conservation Fund's North Coast Forest Conservation Program") states the commitment to SFI on page 3.

Confirmed TCF Working Forest Fund webpage link covering certification

<http://www.conservationfund.org/what-we-do/working-forest-fund/certification>

The page includes:

- 1) SFI & FSC certificates
- 2) Contact info
- 3) Summary of monitoring program
- 4) WFF management plan summary

Evidence was provided to support the following, from "SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries":

TCF has a written statement of commitment to the SFI Standard as part of its Sustainable Forestry Commitment addressing all required elements of the SFI Standard.

The Sustainable Forestry Commitment (TCF-SFI-05) is sent to all contractors including Forestry Consultants and contract loggers (TCF-SFI-07) where a direct contractual relationship exists. It is also formally communicated to TCF personnel:

**From:** Tison, Scott **Sent:** Thursday, September 08, 2016 11:05 AM **To:** All Staff

<[AllStaff@conservationfund.org](mailto:AllStaff@conservationfund.org)> **Subject:** FW: files for all staff Colleagues, attached please find information related to our commitment to follow Sustainable Forest Initiative (SFI) best management practices in relation to our forested properties. Every year we are required to review our practices and train staff on the practices. David Whitehouse's presentation today during the Conservation Acquisition call is part of our annual training but staff should also take the time to review our commitment and the program attached. If you have any questions about our SFI Program please contact me or David Whitehouse. Scott M. Tison, Real Estate Legal Manager

11.1.2. Assignment and understanding of roles and responsibilities for achieving *SFI 2015-2019 Forest Management Standard objectives*.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** "TCF SFI Training, 7-27-17, Agenda" provides a list of "Things you need to pay particular attention to on SFI certified properties with no management...", representing a thoughtful approach to ensuring requirements are met on the parcels not being actively managed. Attendee list has 39 names, all TCF. The program has demonstrated good performance on the more-active tracts, which tend to be the focus for managers and auditors.

**2017, 2016:** David Whitehouse, Operations Forester has overall responsibility for forest certification programs outside of California, where Holly Newberger is responsible.

The SFI Forest Management Program designates responsibilities (1.1,1,a)

Interviews with employees and contractors indicated understanding of roles and responsibilities.

North Coast Forest Conservation Program: Staff Training and Education Matrix defines training requirements for the North Coast Forest Conservation Program.

11.1.3. Staff education and training sufficient to their roles and responsibilities.

N/A   
  Conformance   
  Exceeds   
  O.F.I.   
  Major NC   
  Minor NC

Audit Notes: **2017:** SFI Training Materials for ACQ call -2017; SFI Training-Attendance (27 July 2017)

Interviews included discussions regarding informal staff training for Chain of Custody.

North Coast California: Reviewed "Staff Training 9.20.17.docx" which is a list of training, seminars, and activities. This was reviewed, confirming a comprehensive, regular program of training.

Success Pond, New Hampshire: LandVest forester is an SAF Certified Forester and completed regular trainings as part of his SAF certification on a variety of topics.

CFI, Georgia: Joe James is an Auburn forestry graduate. He is a registered forester in GA, SC, and AL. He has had additional training in the SFI Standard.

**2016:** David Whitehouse has a BS degree in wildlife management and a MS degree in forestry from Stephen F Austin State University. Experience includes an impressive range of wildlife management and forest management duties, most recently as the manager of a certified group of small owners for IP under the FSC standard.

Brian Dangler, Director of Working Forest Fund has a focus on real estate is a licensed forester in Maine and in North Carolina.

Trevor Cutsinger has a Master of Environmental Management degree from the Nicholas School of the Environment at Duke University and has attended the SFI Annual Conference in the past.

Buck Vaughn, Analyst has a B.S. in Forest Management and a Master of Forestry from North Carolina State University and is involved in continuing forestry education in North Carolina.

Working Forest Fund Staff Training and Public Service 2016 provided records of recent training in these two categories for:

- Trevor Cutsinger
- Buck Vaughn
- Brian Dangler
- Kevin Harnish
- Bethany Olmstead

North Coast Forest Conservation Program: North Coast Forest Conservation Program Staff Training Log (9.20.16) documents training of employees in each position (Timberlands Manager, Registered Professional Foresters, Forestry Technician, Program Coordinator, and Forest Analyst) for these broad categories:

- Participate in SFI Implementation Committee and other forestry associations
- Sustainable forestry principles and SFI & FSC standards
- Best management practices: specific to streamside and road management
- Principles related to reforestation, invasive plants and animals, forest resource conservation and aesthetics
- Responsibilities under the US Endangered Species Act, Salmonid Protocol, NSO Protocol and Red Legged Frog Protocol
- Safety precautions
- OSHA regulations
- Business Management
- Emerging Technologies
- Forest carbon quantification and verification

Road engineering

11.1.4. Contractor education and training sufficient to their roles and responsibilities.

N/A   
  Conformance   
  Exceeds   
  O.F.I.   
  Major NC   
  Minor NC

Audit Notes: **2017:** North Coast California: Review of the Logging Contract for Ironing Board THP, Big River (THP Number 1-16-103 MEN) between The Conservation Fund and Robert Piper confirmed clause 4.4 requires Qualified Logging Professional, defined as both California Licensed Timber Operator (LTO) and one of the approved California-specific logger training programs (ACL or LANC) further detailed in the Audit Notes for SFI Indicator 11.2.2 below. Robert Piper is a California Licensed Timber Operator (LTO) and has completed the Qualified Logging Professional training program, based on evidence of completion of the on-line portion.

Twin Lakes, Wisconsin: Joe Mattke 2017 SFI Training; Joe is also a Wisconsin Cooperating Forester.

Cranberry Lake, N.Y.: All F&W foresters meet annually in Georgia, with 2 full days of continuing education. Foresters managing this tract attend these company meetings and also attend local training, for example most-recently training from NY State DEC on issues associated with forest-dwelling bat species.

Success Pond, New Hampshire: Loggers for sites visited hold CLP or Master Logger certification.

CFI, Georgia: Verified logger training of loggers for sites visited.

**2016:** "All contract loggers are required to be Qualified Logging Professionals as defined in the SFI Standard."

Source: SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries TCF-SFI-04.

From "SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries":

TCF authorizes, by entering into a contract, the forest consultant to provide the following general services:

- 1) Create, implement, and modify as necessary, annual and ten-year management plans and budgets,
- 2) Sell timber by sealed bid offering or by negotiation,
- 3) Implement and contract for physical improvements (including road maintenance),
- 4) React quickly to fire, theft, insect, disease, severe weather, or other similar problems,
- 5) Manage recreational or other leases, and
- 6) Identify and implement necessary silvicultural prescriptions.

TCF's consulting foresters closely monitor all harvest operations and provide detailed harvest plans with flagged or painted job layout and have a mandatory, structured Pre-Harvest Conference. A Pre-Harvest conference checklist is used to document this process.

Sansavilla Tract, Georgia: Interviewed Joe James, Consulting Forester for The Conservation Fund for the Sansavilla Tract. He confirmed that he checks credentials. Also interviewed Ricky Wilson, Wilson Brothers Inc. who has the Georgia Master Harvester Program training. Also confirmed that the harvest of Stand #734 has Master Timber Harvester Bryan Peacock.

North Coast California: Road contractors for the North Coast Forest Conservation Program are licensed as General Engineers. Robert Piper is the only contractor for timber harvests and is a California Licensed Timber Operator (LTO). The California SFI Implementation Committee no longer approves LTO as equivalent to QLP, and now requires some SFI-approved training. Robert Piper attended certified logger training March 17/18, 2016 in Ukiah at the Redwood Region Logging Conference. <http://www.rrlc.net/prologger-classes>. He attended 8 classes in March and will be taking additional classes in Reno in January 2017.

"Marijuana in our Forests - Safety First!" 2 Credits

"Water Drafting Regulation" 2 Credits

"Family Estate Planning 101" 2 Credits

"CHP Regulation Updates" 2 Credits

"Driver Safety for ALL" 2 Credits

"Risk Management" 2 Credits

"First Aid & CPR" 2 Credits

Jamaica Tract, Vermont: Red Start Forestry has 3 foresters who are involved, and all have professional forestry degrees. Ben Machin has a Master's degree from University of Vermont; Markus Bradley has a 2-year forestry degree from Paul Smith's College and a Bachelor of Forestry degree from University of Vermont; Dana Hazen has Bachelor of Forestry degree from Paul Smith's College. All have forestry licenses from Vermont, and 2 also have New Hampshire Licenses.

11.1.5. *Program Participants shall have written agreements for the use of qualified logging professionals and/or certified logging professionals (where available) and/or wood producers that have completed training programs and are recognized as qualified logging professionals.*

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** Confirmed that the following language has been added to TCF Logging Agreements, resolving the issues from the 2016 Opportunity for Improvement:

4.4 CONTRACTOR shall at all times be a Licensed Timber Operator (LTO) and possess a valid LTO license issued by the California State Board of Forestry. CONTRACTOR agrees that the supervisor with on-site responsibility for the logging crews is considered a Qualified Logging Professional as defined in the Sustainable Forestry Initiative® (SFI®) Standards. A Qualified Logging Professional is a person who is a Licensed Timber Operator (LTO) in the State of California and is either a current Certified Logger SM under the Loggers Association of Northern California or a Pro Logger under the Associated California Loggers. LTO training records must be provided to TCF annually.

Requirements for logger training are present in harvesting contracts for sites visited.

**2016:** There is an Opportunity for Improvement in the clarity of the logging agreements in California regarding the use of qualified logging professionals. (This was resolved; refer to 2017 notes above.)

North Coast California: The following contracts were provided: Logging, COC Policy, Herbicide, Pre-commercial thinning, Planting. Piper Feldman Gulch BR Logging agreement:

The "Piper Feldman Gulch BR Logging agreement" states that the "CONTRACTOR warrants that it is a Licensed Timber Operator (LTO) possessing a valid LTO license from the California State Board of Forestry." This agreement does not specify the required training per the memo "California SFI® Implementation Committee Policy Regarding Qualified Logging Professionals". Evidence was provided that the contractor, Robert Piper, who is a California LTO and is the only contractor for timber harvests, has taken some of the required SFI training.

Confirmed provision for the Jamaica Tract, Vermont: Timber sale Contract Number: TCF\_Redstart\_2015-01.

Sansavilla Tract, Georgia: Contract Number: 08262016 (shelterwood cut, stop 4, Stand 831) includes requirement for training in Appendix A Contract Provisions (Clause 1 for BMPs, Clause 3 for QLP logger training).

Confirmed: From "SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries":

TCF requires contract loggers to attend SFI sponsored Professional Logger Training or equivalent training, and to maintain their continuing education. SFI Logger Training or equivalent logger training is documented on the Monitoring Checklist and on the Logging Contract. The Forest Operations Manager also checks the name of the contract logging supervisor against the SFI Logger Training websites in the respective States.

## Performance Measure 11.2

*Program Participants shall work individually and/or with SFI Implementation Committees, logging or forestry associations, or appropriate agencies or others in the forestry community to foster improvement in the professionalism of wood producers.*

Indicators:

11.2.1. *Participation in or support of SFI Implementation Committees to establish criteria and identify delivery mechanisms for wood producer training courses and periodic continuing education that address:*

- a. awareness of sustainable forestry principles and the SFI program;
- b. best management practices, including streamside management and road construction, maintenance and retirement;
- c. reforestation, invasive exotic plants and animals, forest resource conservation, aesthetics and special sites;
- d. awareness of responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act, and other measures to protect wildlife habitat (e.g., Forests with Exceptional Conservation Value);
- e. awareness of rare forested natural communities as identified by provincial or state agencies, or by credible organizations such as NatureServe, The Nature Conservancy, etc.
- f. logging safety;
- g. U.S. Occupational Safety and Health Administration (OSHA) and Canadian Centre for Occupational Health and Safety (CCOHS) regulations, wage and hour rules, and other provincial, state and local employment laws;
- h. transportation issues;
- i. business management;
- j. public policy and outreach; and
- k. awareness of emerging technologies.

N/A  
  Conformance  
  Exceeds  
  O.F.I.  
  Major NC  
  Minor NC

Audit Notes: **2017:** North Coast California: 2016 California SIC Meeting Agenda; California SIC List – January, 2016  
 Associated California Loggers (ACL) Pro Logger Training was accepted as “Qualified Logging Professional” equivalent, with some additional training. The Loggers Association of Northern California (LANC) Certified Logger Program has similar qualified approval. Reviewed letters from 2.05.16, 2.15.16, and 11.29.15 (“The CA SIC has determined that both the Certified Logger under the Loggers Association of Northern California and the Pro Logger under the Associated California Loggers are the designated programs to meet the requirements of the Forest Management Standard, Objective 11, Performance Measure 11.2, Indicators 1 and 2”)

**2016:** The Conservation Fund currently participates in SFI Implementation Committees in Georgia, California and New Hampshire, with either TCF staff or consultants attending meetings with varying degrees of regularity. Evan Smith and Scott Kelly are voting members of the CA-SFI Implementation Committee.

Because of increasing levels of activity in Georgia TCF is now on the Georgia SIC, but thus far has not yet attended.

Reviewed agenda for California SFI Implementation Committee meeting attended by Scott Kelly on October 29, 2015 at the SPI Office, Anderson, CA. Topics: Review of Significant New Elements in the 2015-2019 SFI Standard; California SIC Policy on Certified Loggers- SIC Past Policy, Results of SFI Review, Draft Policy for Qualified Logging Professionals Under the SFI 2015-2019 Standard; Pro Logger and Certified Logger Update; Public Outreach Efforts; Green Building Update; Report on 2015 SFI Annual Conference in Squaw Valley Others

11.2.2. The SIC-approved *wood producer training programs* shall have a continuing education component with coursework that supports the current training *programs*, safety and the *principles of sustainable forestry*.

N/A  
  Conformance  
  Exceeds  
  O.F.I.  
  Major NC  
  Minor NC

Audit Notes: Jamaica Tract, Vermont: Vermont’s program has a continuing education requirement.

Sansavilla Tract, Georgia: Georgia’s Logger Training Program is the Master Harvester Program, which has a continuing education component.

North Coast California: Requirements for Licensed Timber Operator include continuing education.

11.2.3. Participation in or support of *SFI Implementation Committees* to establish criteria for recognition of logger certification *programs*, where they exist, that include:

- a. completion of *SFI Implementation Committee* recognized logger training *programs* and meeting continuing education requirements of the training *program*;
- b. independent in-the-forest verification of conformance with the logger certification *program* standards;
- c. compliance with all applicable laws and regulations including responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act and other measures to protect *wildlife habitat*;
- d. use of *best management practices* to protect water quality;
- e. logging safety;
- f. compliance with acceptable *silviculture* and utilization standards;
- g. aesthetic management techniques employed where applicable; and
- h. adherence to a management or harvest plan that is site specific and agreed to by the forest landowner.

N/A  
  Conformance  
  Exceeds  
  O.F.I.  
  Major NC  
  Minor NC

Audit Notes: The Conservation Fund does not participate in an SFI Implementation Committees in states where there is a logger certification program.

## Objective 12 Community Involvement and Landowner Outreach

To broaden the practice of *sustainable forestry* through public outreach, education, and involvement, and to support the efforts of *SFI Implementation Committees*.

### Performance Measure 12.1

*Program Participants* shall support and promote efforts by consulting foresters, state, provincial and federal agencies, state or local groups, professional societies, *conservation* organizations, *Indigenous Peoples* and governments, community groups, sporting organizations, labor, universities, extension agencies, the *American Tree Farm System*® and/or other landowner cooperative *programs* to apply *principles* of sustainable forest management. Indicators:

12.1.1. Support, including financial, for efforts of *SFI Implementation Committees*.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** Working Forest Fund: Evidence of payments to the New Hampshire and the Georgia SFI Implementation Committees was provided by David Whitehouse.

North Coast California:

From: Cedric Twight [mailto:CTwight@spi-ind.com]

Sent: Wednesday, October 4, 2017 12:45 PM

To: Kelly, Scott <skelly@conservationfund.org>; Chris Quirmbach <chrisq@sor.timberproducts.com>

Cc: Mike Ferrucci <mferrucci@iforest.com>

Subject: RE: CA SIC annual meeting- Doodle Poll

Scott, You are correct, the CA SIC does not require annual dues payments. Money is raised on an "as needed" basis as needs arise. Cedric

2016 California SIC Meeting Agenda; California SIC List – January, 2016: Scott Kelly attended

Plan to attend the 2017 meeting: November 10<sup>th</sup> 2017, 10 AM to 2 PM at SPI Anderson. So mark your calendars and attend the CA SIC annual meeting

**2016:** Not reviewed during the 2016 SFI Audit.

12.1.2. Support, individually or collaboratively, education and outreach to forest landowners describing the importance and providing implementation guidance on:

- a. best management practices;
- b. reforestation and afforestation;
- c. visual quality management;
- d. conservation objectives, such as critical wildlife habitat elements, biodiversity, threatened and endangered species, and Forests with Exceptional Conservation Value;
- e. management of harvest residue (e.g., slash, limbs, tops) considers economic, social, environmental factors (e.g., organic and nutrient value to future forests) and other utilization needs;
- f. control of invasive exotic plants and animals;
- g. characteristics of *special sites*; and
- h. reduction of wildfire risk.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017:** North Coast California: The Conservation Fund website includes a web page with links to key relevant plans:

<https://www.conservationfund.org/projects/north-coast-forest-conservation-initiative/north-coast-reference-documents>

Success Pond: website: \*\*

Not reviewed during the 2016 SFI Audit.

12.1.3. Participation in efforts to support or promote *conservation* of managed forests through voluntary market-based incentive *programs* such as current-use taxation *programs*, *Forest Legacy Program* or *conservation* easements.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017, 2016:** The Conservation Fund has an exceptional program for the long-term conservation and protection of managed forests.



The Conservation Fund has completed numerous conservation projects throughout the U.S. which have resulted in the permanent protection of hundreds of thousands of acres using conservation easements or, in some cases through carefully-arranged fee sales to public land agencies. These include Forest Legacy Program or other conservation easements completed in Maine, New Hampshire, Vermont, New York, Pennsylvania, and North Carolina.

From “SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries”:

“TCF intends to purchase new properties of high conservation value and find an appropriate long-term owner that will manage the properties to meet conservation objectives, or manage the Working Forest Fund properties for conservation and income until a conservation easement can be placed.”

**2017:** Interviews and press-releases confirmed continuation of The Conservation Fund’s exceptional efforts to conserve working forests.

**2016:** Jamaica Tract, Vermont and many others in Vermont are enrolled in the Vermont Use Value Tax Program.

North Coast California: Source - Draft Buckeye Forest Integrated Resource Management Plan: ‘The Buckeye Forest was acquired in May 2013 by The Conservation Fund (the Fund), in partnership with the California Coastal Conservancy, Sonoma County Agricultural Preservation and Open Space District (SCAPOSD), the Gordon and Betty Moore Foundation, Packard Foundation, and the Sonoma Land Trust. The forest is owned by Sustainable Conservation, Inc. (SCI), known as Buckeye Forest (the Forest) in California ... As part of the sustainable management of the working forest, and as a condition of partner funding, SCI conveyed a conservation easement (CE) over the majority of the Forest to SCAPOSD to maintain the conservation values inherent in the Forest in perpetuity. The conservation easement describes the Forest as having “significant conservation values” to SCI, Sonoma County and its residents, and the State of California that are worthy of conservation. The conservation values include “significant natural, ecological, fish and wildlife habitat resources; forestry resources; and open space and scenic resources.”’

**Performance Measure 12.2**

*Program Participants* shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education and involvement related to sustainable forest management. Indicator:

12.2.1. Periodic educational opportunities promoting *sustainable forestry*, such as

- a. field tours, seminars, websites, webinars or workshops;
- b. educational trips;
- c. self-guided forest management trails;
- d. publication of articles, educational pamphlets or newsletters; or
- e. support for state, provincial, and local *forestry organizations* and soil and water *conservation districts*.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes: **2017, 2016:** TCF provides an exceptional level of public education and involvement related to sustainable forest management.

North Coast California: A list of outreach activities was provided by TCF prior to the start of the audit; some items were confirmed via written evidence or by interviews. The outreach program includes regular events that provide very detailed and extended opportunities for public participation and education.

**2017:** North Coast California: The 2012 Social Impacts Assessment continues to guide TCF’s strategy and programs: “The Conservation Fund’s North Coast Forest Conservation Program endeavors to have a very positive impact in our local community. This is due in part to our charitable mission as a non-profit organization, which is broader than just environmental protection, and references economic development and education. It is also explicitly addressed as part of the Garcia River Forest Integrated Resource Management Plan” (Source: Social Benefit/Impact Assessment Memo. The Conservation Fund’s North Coast Forest Conservation Program. Primary authors: Jenny Griffin and Evan Smith. Original: August 25, 2008; Updated September 2012.)

**2016:** Jamaica Tract, Vermont: Consulting foresters interviewed described regular, substantive efforts in youth education, including vocational day event with 8<sup>th</sup> grade students and a twice-annual forestry training day at The Mountain School associated with Milton Academy, which provides “A semester school for high school juniors in Vermont” <http://www.mountainschool.org/> .

Sansavilla Tract, Georgia: The property was part of a day-long field forestry tour for The Forest Guild on May 20, 2016. There were 3 attendees from TCF and more than 12 from The Forest Guild.

**Performance Measure 12.3**

*Program Participants* shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees, unions, the public or other *Program Participants* regarding practices that appear inconsistent with the *SFI Standard principles and objectives*. Indicators:

12.3.1. Support for *SFI Implementation Committees* (e.g., toll-free numbers and other efforts) to address concerns about apparent nonconforming practices.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes:    **2017:** 2016 California SIC Meeting Agenda; California SIC List – January, 2016  
 2017 Meeting minutes from NH SIC meetings.  
**2016:** Not reviewed during the 2016 SFI Audit.

12.3.2. Process to receive and respond to public inquiries. *SFI Implementation Committees* shall submit data annually to *SFI Inc.* regarding concerns received and responses.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes:    **2017:** North Coast California: “XVV. Community Engagement” section of “Forest Management Policies for the Conservation Fund’s North Coast Forest Conservation Program” outlines the various community involvement and outreach efforts, some of which are described further below or elsewhere in the audit checklist; notable is this statement “In all situations, TCF strives to be a good neighbor and fair employer, and will hold itself to high professional standards in its dealings with the local community, contractors, Native American tribes, public agencies, and all other interested parties.”

Advisory Group meets occasionally

The Conservation Fund—North Coast Forest Conservation Initiative Stakeholder Complaint Log has one entry for August 2017 and one for September 2017; both were responded to (involving neighbor issues).

**2017, 2016:** North Coast California: Reviewed the “TCF Complaint Log” and supporting information, confirming that there is a process for receiving, recording, and responding to public inquiries.

From TCF’s Forest Management Policies “XVV. Community Engagement: TCF seeks involvement from the local community at several stages of its activities. A public meeting was held to review the management plan for BR/SC, much like a meeting was held in Point Arena to review the GRF IRMP prior to adoption. Interested parties are invited to participate in a tour of each THP either before or shortly after submission, and again following completion of the operation. In addition, TCF staff is available to respond to questions or concerns raised by the local community. TCF prepares and broadly disseminates an Annual Report that describes major activities on the properties, changes to policies, and monitoring results. Should a dispute arise between TCF and a local citizen, neighbor, partner organization, current or potential contractor, or other interested entity, TCF will first seek to resolve the dispute through open communication, prior to more formal dispute resolution through mediation or litigation. Records of disputes will be made available to the lead certification auditor. In all situations, TCF strives to be a good neighbor and fair employer, and will hold itself to high professional standards in its dealings with the local community, contractors, Native American tribes, public agencies, and all other interested parties.



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**Objective 13 Public Land Management Responsibilities**

To participate and implement sustainable forest management on *public lands*.

**Performance Measure 13.1**

*Program Participants* with forest *management responsibilities on public lands* shall participate in the development of *public land* planning and management processes. Indicators:

13.1.1. Involvement in *public land* planning and management activities with appropriate governmental entities and the public.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: NA; The Conservation Fund does not manage public lands.

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13.1.2. Appropriate contact with local stakeholders over forest management issues through state, provincial, federal or independent collaboration.

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: NA; The Conservation Fund does not manage public lands.

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## Objective 14 Communications and Public Reporting

To increase transparency and to annually report progress on conformance with the *SFI Forest Management Standard*.

### Performance Measure 14.1

A *Program Participant* shall provide a summary audit report, prepared by the *certification body*, to *SFI Inc.* after the successful completion of a certification, recertification or surveillance audit to the *SFI 2015-2019 Forest Management Standard*. Indicator:

14.1.1. The summary audit report submitted by the *Program Participant* (one copy must be in English), shall include, at a minimum,

- a. a description of the audit process, *objectives* and scope;
- b. a description of substitute *indicators*, if any, used in the audit and a rationale for each;
- c. the name of *Program Participant* that was audited, including its *SFI* representative;
- d. a general description of the *Program Participant's* forestland included in the audit;
- e. the name of the *certification body* and *lead auditor* (names of the *audit team* members, including *technical experts* may be included at the discretion of the *audit team* and *Program Participant*);
- f. the dates the audit was conducted and completed;
- g. a summary of the findings, including general descriptions of evidence of conformity and any nonconformities and corrective action plans to address them, opportunities for improvement, and exceptional practices; and
- h. the certification decision.

The summary audit report will be posted on the *SFI Inc.* website ([www.sfiprogram.org](http://www.sfiprogram.org)) for public review.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes:    **2017, 2016:** The 2015 SFI Surveillance Audit Summary Report, which contains the required information, is posted on the SFI website.

### Performance Measure 14.2

Program Participants shall report annually to SFI Inc. on their conformance with the SFI 2015-2019 Forest Management Standard. Indicators:

14.2.1. Prompt response to the *SFI* annual progress report survey.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes:    **2017:** Per email from Zachary Wagman, Coordinator, Statistics and Label Use, Sustainable Forestry Initiative, received somewhat late: 2017-05-10. However, evidence from TCF shows that it was provided early, but there was some later clarification needed that may have caused SFI to have the wrong date. All previous reports were submitted early, and the evidence provided by TCF is definitive.

**2016:** Per email from R.D. of SFI Inc.: "yes, March 29<sup>th</sup>"

14.2.2. Record keeping for all the categories of information needed for *SFI* annual progress report surveys.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes:    **2017:** Twin Lakes Tract, Wisconsin: Records requested were readily available, and include legally-required "Cutting Notice and Report of Wood Products from Forest Crop and Managed Forest Lands".

North Coast California: Records requested were readily available, and showed that all categories of information are available. This program is particularly complex and broad, and the organization, depth, and clarity of written documentation were superb and contributed greatly to an efficient audit process.

**2016:** Jamaica Tract, Vermont: Consulting forester's systems and documentation include key information required.

Sansavilla Tract, Georgia: Consulting forester's systems and documentation were assessed and found to be reliable and detailed respectively.

North Coast California: Records requested were readily available, and showed that all categories of information are available. This program is particularly complex and broad, and the organization, depth, and clarity of written documentation were superb and contributed greatly to an efficient audit process.



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14.2.3. Maintenance of copies of past survey reports to document progress and improvements to demonstrate conformance to the *SFI 2015-2019 Forest Management Standard*.

- N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

Audit Notes:    **2017:** David Whitehouse provided the 2016 survey report.

**2017, 2016:** From "SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries":  
"TCF collects and maintains records for all categories of information needed for the SFI Annual Progress Report. The Forest Operations Manager submits the reports to SFI, Inc. by the deadline of March 31st for the previous years' activities."

The Forest Operations Manager maintains past reports electronically.

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## Objective 15 Management Review and Continual Improvement

To promote continual improvement in the practice of *sustainable forestry* by conducting a management review and monitoring performance.

### Performance Measure 15.1

*Program Participants* shall establish a management review system to examine findings and progress in implementing the *SFI 2015-2019 Forest Management Standard*, to make appropriate improvements in *programs*, and to inform their employees of changes.

Indicators:

#### 15.1.1 System to review commitments, *programs* and procedures to evaluate effectiveness.

N/A     Conformance     Exceeds     O.F.I.     Major NC     Minor NC

**Audit Notes:** **2017:** North Coast California: February 1, 2017, Internal Management Review meeting for 2017 operations, Ukiah office, 9:00 AM, In attendance: Holly Newberger, Scott Kelly, Evan Smith, Lauren Fety, Lynsey Kelly, Madison Thomson, Margery Hoppner, Olivia Fiori, Mark Taylor, Don Miller. For each of the five forests, as relevant, the following topics were covered: Timber Harvests, THP’s available, THP’s in progress, THPs in Planning, Active FRGP projects, Develop FRGP projects, TCF-funded road projects, Hack and squirt, Planting, PCT, Invasive Weeds, Forest Inventory, Carbon, Monitoring, Public Access, Botanical Surveys, NSO Calling, Certification, HCV, Outreach.

“Garcia River Watershed and Monitoring Program –Overview, Status and Trends. Jonathan Warmerdam, North Coast Water Board and Jennifer Carah, The Nature Conservancy. April 26, 2017” PowerPoint presentation about the Environmental Monitoring and Assessment Program (US EPA) describing challenges (degraded stream from past land logging and land uses), restoration efforts (TCF and others), and monitoring program. The monitoring program, supported by TCF and largely on TCF’s lands, is significantly more-robust than that required per the TMDL program. Trends: “Tributary streams appear to be getting deeper and more complex, providing better rearing habitat”; positive trends in stream morphology; “Substrate composition in tributaries are recovered but continue to fluctuate. Mainstem reaches are still impaired.”; “Large wood and instream channel cover is lacking, but restoration actions are increasing volume and habitat”; “Water temperatures are high in the mainstem and some tributaries, but canopy cover is improving.”; “The tributaries are healthy according to the bugs. Salmon and trout are found in every sub watershed, albeit in low numbers.”

**2017; 2016:** Working Forest Fund: The Forest Operations Manager oversees activities on the parcels outside of California. Consulting foresters provide regular written reports, and the Forest Operations Manager visits each property regularly. The reporting framework includes:

Quarterly Reports (template under separate attachment) due by 15th day of new quarter for previous quarter  
Annual Report (summary of quarterly reports from the previous year) due by January 15th

**2016:** Sansavilla Tract, Georgia: Forest management activity records cover harvests and other significant management activities. All tracts are inspected at least annually, even if there has not been any management activity.

North Coast California: From the “Social Benefit/Impact Assessment Memo - The Conservation Fund’s North Coast Forest Conservation Program”: As part of our annual monitoring, we publicly report (via the Annual Review) our data on key activity metrics. Most relevant to this topic is reporting on local economic contribution, participants in our public access program, and number of public tours we host. In addition to these three metrics that seem to best track the community interest, we usually also include short features on specific harvests, restoration projects, or safety issues. We also keep a log of any criticisms the program receives and how those are resolved. These metrics and concerns are also reviewed annually by the local Advisory Council. Source: North Coast Forest Conservation Initiative - 2015 Annual Review

Confirmed by reviewing some key documents and by interviewing David Whitehouse and Trevor Cutsinger:

The Forest Operations Manager oversees activities on the parcels outside of California. Consulting foresters provide regular written reports, and the Forest Operations Manager visits each property regularly. The reporting framework includes:

Quarterly Reports (template under separate attachment) due by 15th day of new quarter for previous quarter  
Annual Report (summary of quarterly reports from the previous year) due by January 15th  
Annual Budget (submitted by December 15th) for following year  
Annual Management Plan (based on budget, explains proposed operations)

**15.1.2 System for collecting, reviewing, and reporting information to management regarding progress in achieving *SFI 2015-2019 Forest Management Standard objectives and performance measures.***

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: North Coast California: “North Coast Forest Conservation Initiative - 2016 Annual Review”

**2017, 2016:** Elements of the system are listed in TCF-SFI-03 SFI Evidence Manual & Internal Audit Checklist:

- Monitoring Checklists (Harvest Operations Site Review Reports) (2.3,3,a)
- State BMP Monitoring Reports (10.2,1,b)
- Staff Training Matrix (11.1,3,a)
- Contractor Training Matrix (11.1,4,a)

**15.1.3 Annual review of progress by management and determination of changes and improvements necessary to continually improve conformance to the *SFI 2015-2019 Forest Management Standard.***

N/A    Conformance    Exceeds    O.F.I.    Major NC    Minor NC

Audit Notes: **2017:** The “Annual SFI Management Review Agenda, The Conservation Fund (TCF) - August 2, 2017” documents the review which included a range of topics and had participation from Brian Dangler, Bethany Olmstead, Scott Tison, Holly Newberger, Trevor Cutsinger, Kevin Harnish, Ana Castillo, and Kendall DeLyser.

**2016:** Reviewed the agenda and minutes for the Annual SFI Management Review that was held on September 14, **2016:** “Attended: Buck Vaughan, Brian Dangler, Evan Smith, Bethany Olmstead, Scott Tison, Scott Kelly, Holly Newberger, Trevor Cutsinger, Kevin Harnish”. Relevant items discussed are listed:

- Past Action Item review
- The Monitoring Checklist and State BMP Inspection Reports;
- External audit and corrective action results Staff and contracting training accomplishments documented in the Training Matrices Suggested changes/improvements to policies or procedures.
- Success and Failures of Social Impacts?
- Review the SFI Annual Survey Report;
- SFI Implementation Committee Action Items and Inconsistent Practices complaints; Changes to the SFI Standards and action needed to meet the new requirements.

Also interviewed David Whitehouse and Trevor Cutsinger

From “SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries”:

“TCF has a formal system for annually collecting information about its SFI implementation, evaluating the effectiveness of its SFI Programs, reporting information to management, determining whether any changes or improvements are necessary to continually improve SFIS conformance, and communicating those changes to responsible personnel.

TCF references its management review process in its Sustainable Forestry Commitment and in the internal memo to appropriate managers regarding its commitment to the SFI Standard.

The SFI Implementation Team shall annually conduct a review of the SFI Program. During the first quarter of each calendar year, or as appropriate, the Forest Operations Manager shall serve as the Chairman of the Implementation Team and shall develop a formal Management Review Agenda (TCF-SFI-16). The management review will evaluate SFI performance during the preceding calendar year or 12 months. At a minimum, the SFI Management Review shall address:

- The Monitoring Checklist and State BMP Inspection Reports;
- Any Environmental Incidents and corrective action results;
- External audit and corrective action results (i.e. third party SFI audits);
- Staff and contracting training accomplishments documented in the Training Matrices; and
- Suggested changes to policies or procedures.

The Chair of the SFI Implementation Team shall ensure that all necessary information to address these issues is collected and available for the management review. The SFI Implementation Team shall also review the





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Sustainable Forestry Commitment, the SFI Program and assess TCF's performance against its own programs, plans, and procedures, as well as the SFI Standard.

At the conclusion of the annual management review, any significant findings or action items shall be presented by the Forest Operations Manager at the next scheduled Certification Team meeting. The Certification Team shall review and decide on any overall actions. The Forest Operations Manager shall make any appropriate changes to the overall SFI Program and communicate those changes to responsible staff via a Summary Memo. The Forest Operations Manager shall coordinate any appropriate follow-up implementation training to effect the changes. “

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(End SFI Forest Management Checklist)



## Appendix 4

## NSF Audit Attendance Sheet

Company Name: The Conservation Fund

Locations: California, Georgia, New Hampshire, New York, Wisconsin

Type of Audit: Surveillance; Scope Expansion

Opening Meeting Date: August 24, 2017 Closing Meeting Date: November 3, 2017

NAME (Printed)	TITLE/POSITION	OPENING MEETING (Initials)	CLOSING MEETING (Initials)
David Whitehouse (all except CA)	Forest Operations Manager, Working Forest Fund®	DW	DW
<b>August 24 (Wisconsin)</b> Joe Mattke	Consulting Forester		
<b>September 26 (New York)</b> Tom Duffus, Tom Gilman P.J. Kavanagh	V.P., Midwest Region and Northeast Representative Regional Forester, F&W Forestry Services Forester, F&W Forestry Services		
<b>October 4-5 (California)</b> Holly Newberger Scott Kelly Madison Thompson Parker Jean Lauren Fety	North Coast Program Coordinator, TCF Timberlands Manager, TCF Forester, TCF Forest Technician, TCF Forest Analyst		HN
<b>October 4 (New Hampshire)</b> Michelle Matteo Sally Mankian Bethany Olmstead David DeGruttola	NSF Auditor VT/NH Rep TCF Conservation Manager, WFF Land Vest, Inc District Forester	MM SM BO DG	MM SM BO DG
<b>Date (Georgia)</b> Tucker Watts	NSF Auditor		

## Appendix 5

## Field Site Notes

Twin Lakes Property, Upson, Wisconsin; August 24, 2017			
Site #	Name	Feature of interest	Audit team notes
7-9 am 9 am	Auditor and Management Representative drive to Upson	Opening Meeting and Property Briefs	Introductions; Overview of Forest Certification process; Property Overview; Site Selection; finalize agenda
	O'Brien Lake Loop	Permanent Road	Road is generally well-designed and maintained.
1	O'Brien Lake Loop, Map Location A	Culvert Replacement	Culvert does not extend at least 1 foot beyond road fill, per Wisconsin BMPs.
2	O'Brien Lake Loop, Map Location B	Culvert Replacement	Culvert does not extend at least 1 foot beyond road fill, per Wisconsin BMPs.
3	Pine Knolls Timber Sale	50-acre Stand Marked for Selection Harvest	Confirmed that the stand was marked per the Wisconsin Silviculture Manual, required as part of the MFL agreement. Discussed wildlife tree retention.
4	O'Brien Lake Loop, Map Location C	Culvert Replacement	Culvert extends two feet at one end but less than 1 foot beyond road fill on the other end, per Wisconsin BMPs.
5	O'Brien Lake Loop, South of Location C	Road drainage provision maintenance	Observed surface erosion of sloping portion of road here and in 2 other locations. Road crown is worn somewhat, wheel ruts are embedded, and there is a grassed raised berm preventing water from leaving road surface and entering ditch.
6	O'Brien Lake Loop, Map Location D	Culvert Replacement	Culvert on upstream side is one foot, otherwise ok as this is a very minor drainage.
7	Pine Knolls Timber Sale	18-acre Stand Marked for Shelterwood Harvest	Discussed the decision process for this harvest, which was driven by the high percentage of undesirable growing stock. Marking was consistent with silvicultural guidelines.
8	Copper Peak Timber Sale	28-acre Stand Completed Selection Harvest	Confirmed appropriate silviculture including canopy gaps and retention of healthy, vigorous trees. Some rutting was observed.
9	O'Brien Lake Loop, Map Location F	Tyler Forks Crossing road improvements	The existing twin 42-inch culverts had occasionally filled, with damage to the road from overflow. In 2016 TCF built two armored, high-water crossing dips. The southernmost dip was reinforced with additional stone in 2017.

Cranberry Lake, New York, September 26, 2017			
Site #	Name	Feature of interest	Audit team notes
8 am	Opening Meeting, The Packbasket	Opening Meeting and Property Overview	Reviewed harvest levels (actual, planned, and allowable harvest); harvest planning and administration methods; and potential field sites. Selected sites for audit and finalized daily itinerary and logistics.
1	Dillon Pond	Scenic roadside pond	TCF has agreed to concept from New York State DEC involving the construction of an ADA-compliant Kayak launch site here. Harvest (next site) buffered from the pond via an uncut buffer strip
2	Dillon Pond Timber Sale	149-acre marked, sold, uncut shelterwood harvest; sale layout including buffers, stream crossings and landing	Marked over-mature, unhealthy trees leaving residual of 30-40 square feet of basal area per acre. Intended stream crossing located where banks are high and the channel is narrow and firm. Harvest boundary provides ample buffer from Dillon Pond. Interior no-equipment zones protecting sensitive (low, moist) soil areas.
3	2016 Timber Sale, west of town road	Completed shelterwood harvested in summer	Residual 30-40 ft <sup>2</sup> /acre, leaving a fairly open stand, needed to shock beech advanced regeneration and favor other species. Red maple and birch seedlings were observed. The landing area along road is stable but not visually appealing; no other options. Intermittent stream crossing site is stable and was not impacted; steel pipe under poles was method; pipe removed and poles piled uphill forming good water diversion. Many very effective large waterbars made of poles and delimiting brush. Slash effectively deployed.
4	2016 Timber Sale, east of town road	Completed shelterwood harvested in summer	Same prescription as #3 above, but a much larger block with landing set back from road. Walked several skid roads confirming appropriate sale layout, use of slash to stabilize the most-sensitive parts of roads, and limited rutting. Pockets with sensitive (low, wet) soils were generally avoided. The location of pole-bridge (see #3 above, same method) inspected, showing stable conditions per BMPs.
5	Windfall Road	Road maintenance and culvert crossing	Road providing access to significant portion of parcel. It is well-graveled, with some crown and limited ditching in places. Road was recently York-raked. Discussed some places where mini-berm (from grading/raking) on edge of gravel slows movement of water from road surface. The road was formerly a town road; portions somewhat embedded (below grade). Considering steady use this road meets BMPs for road maintenance. Twin culverts at crossing of large open wetland with beaver grates are functioning well, although somewhat short by modern BMP standards (no need to remediate until replaced).
6	Spur road from Windfall Road	Spur road conditions	This section of access road receives less use and is commensurately lower standard (less gravel). It has held up well from the harvest described next (Site 7)
7	Grasse River Timber Sale	Completed over-story removal with reserves	Harvest summer 2016. Forest practice rules (within Adirondack Park) mandate considerable retention within ¼ mile of designated wild and scenic river. Most of the reserve trees observed are good quality, small sawtimber-size cherry and maple. Many brambles, with little regeneration beneath yet, but experience shows a delay.
8	Irish Brook Timber Sale	2018 Planned, partially-marked overstory removal	One-half of sale area marked thus far, may use this as the template for loggers to match on second half. Nearly all of the Black cherry trees have decay, seams, other defect, and/or are larger than 16 inches dbh. Maple trees here and nearby have considerable dieback in upper crowns. A sub-canopy layer (in some patches the dominant layer) of younger pole-size trees, primarily good quality Yellow birch and fair to

			good quality Red maple is present and justifies the removal of most of the overstory and most cherry.
9	Scotch Pine Harvest	Regeneration following 2016 salvage clearcut of Scotch Pine	Ample vigorous, healthy advanced regeneration trees five to twelve foot tall. Balsam fir predominates (90%) but there are also Larch, spruce, maple, and cherry.
10	Buckhorn Road	Road maintenance on shared road	This road is maintained following harvests by whichever landowner has most-recently harvested timber trucked over it. Currently Molpus Timber is using for harvest access, and the road is in good condition. Several culvert crossings appear to be functioning as designed.

<b>Big River Forest – October 4, 2017</b>			
<b>Site #</b>	<b>Name</b>	<b>Feature of interest</b>	<b>Audit team notes</b>
8:15 am	Auditors arrive @ Caspar Office	Opening Meeting and discuss changes past year; Review of Evidence	Also selected field sites and reviewed the daily itinerary.
1	Two Log Haul Road	Road maintenance	Road from Highway 20 Gate to Spur Road to MRC Bridge over Two Log Creek is in good condition with drainage structures functioning. Segment was graded earlier this year using “Green Grading” technique, which aims to minimize disturbance. Applied Magnesium chloride for dust abatement, in part to reduce the need for taking stream water for same purpose, to protect Salmon.
2	Two Log Creek	Protections for Class 1 (fish-bearing) river; Instream habitat	Confirmed compliance with California Forest Practices Act rules, which require on each side of Class 1 stream a 35-foot no cut buffer and maintenance of 80% canopy cover the next 70 feet. Observed some intentionally-placed coarse woody-debris (pairs of 25-foot-long logs) which are improving in-stream habitat (pool scouring had occurred) as part of a Fisheries Restoration Grant.
3	spur road and bridge over Two Log Creek	Condition of inactive spur road and of bridge over Class 1 stream	This road and bridge were last used for the Jarvis Camp THP in 2007. The bridge consists of wooden deck over an old rail car, supported by old, large redwood logs serving as abutments. Structure is well above stream and not impacting stream flow or function. Spur road is stable and vegetated.
4	Two Log Haul Road maintenance project	Spot graveling operation; Interview LTO	Spot graveling operation using rock from TCF pit. 5 dump trucks are tailgate spreading coarse gravelly mix (angular rock) and then Robert Piper, LTO for and the owner of logging company with the crew working on Ironing Board THP, is using bulldozer to spread, tamp, and shape road. Excellent results for road profile for drainage and increased ditch volume. Interviewed Mr. Piper regarding training, oversight by TCF’s foresters, safety, spill provisions, and economic issues.
5	Rabbit Ears 2015 THP	Marking and sale set-up	Individual tree selection in a young (30-year old) third-growth Redwood dominated stand with many multi-stemmed sprout clumps. Trees marked for removal were from a range of size classes, with least-desirable stem form/quality or issues with crowns, and/or heavy to white fir, confirming appropriate marking. 197 acres total, with 63 acres designated selection and 134 lightly-stocked areas designated transition, a variant of the selection method to facilitate increased volumes and stocking when stands don’t meet the criteria for selection prescriptions.
6, 7, 8, 10, 11	Ironing Board THP	Active timber harvest; new road construction to facilitate cable yarding; 3,100’ of near-stream roads to be abandoned Tractor logging on steep slopes Two listed plant species	Underway by Robert Piper Logging; ¼ complete. 317 truckloads (Gross 1334.67 mbf; Net 1247.20 mbf). 437 acres total: 404 acres single tree selection regeneration method; 33 acres group selection regeneration method.
6	Spur Road between	Newly constructed spur road	Previous entry here created extensive system of bladed tractor roads including 3,100 feet of near-stream roads to be abandoned. New

	Stands 2 & 4, Ironing Board		roads allow for uphill cable yarding, protecting streams from sediment and other possible impacts. Most side-hill roads are partially-benched, one section full-benched; all observed have appropriate profile for drainage.
7	Yarder site, Ironing Board THP	Interview of yarder crew	Interviewed the loader operator, yarder operator, and landing man, confirming long experience (first two) and on-the-job training; regular tailgate safety training; regular oversight by TCF's forester; PPE use; and presence of First Aid kit and spill kit.
8	Ironing Board THP, Stand 10	Marking in Stand 10	This unit had received hardwood removal treatment about 20 years ago. Marking consistent with FPA rules and silviculture to improve growth and quality
9	Ironing Board THP, Stand 8	Marking in Stand 8	This unit had not had hardwood removal treatment. Walked unit extensively, seeing marked but not cut portions, portions with felled trees, and portion with trees yarded, as well as Class 3 stream within unit.
10	Ironing Board THP, Stand 11	Stand 11: Completed harvest and on-going hardwood control	The harvest of marked trees in this unit is complete. Crews are felling marked undesirable hardwoods, primarily Tanoak, where young Redwood trees can be effectively released. Many hardwoods remain.
11	Ironing Board THP, Stand 5	Stand 5: Residual stand following cable-yarding harvest	The residual trees in most portions of this unit have little or no residual damage, but some cluster of trees have large patches of bark damage.
12	Area of Northern spotted owl management	Provisions for protection of NSO and their habitat	Map showed the location of NSO activity center, based on location of nest tree for 2016. Reviewed protections, including 100-acre core no-cut area and seasonal restrictions within 0.7-mile radius.



Success Pond, NH – October 4, 2017			
Site #	Name	Feature of interest	Audit team notes
8:15 am	Auditor arrives @ Working Forest Fund office	Opening Meeting and discuss changes in the past year; review of Evidence	Selected field sites and reviewed the daily itinerary. Reviewed Success Pond easement language, Working Forest Fund (WFF) Guidelines Digest, and Management Plan. Management plan for Success Pond, NH is currently under review by the State of NH and will be approved as part of the legal easement Discussion of how the WFF works with The Conservation Fund, and the LandVest Forester to achieve the goals noted in the management plan.
1	Marshall Sale – site 1	<p><b>88 ac, harvest closed, 6521-ST-06:</b> Patch cut with large aspen component.</p> <p>Large stream crossing (removed/closed out) on edge of main landing.</p>	<p>Patch cut with large aspen component, declining aspen and fir removed, irregular boundaries, some retention, including snags and super canopy pines viewed. Full stand not cut due to steep terrain in eastern edge.</p> <p>Osprey in vicinity, noted on harvest documents, property boundary clearly marked.</p> <p>Good use of slash on trails, yellow birch retained on edges and in cut, extensive browse viewed – Coarse woody debris retained with the goal of keeping a wetter microsite for natural regeneration and protection from browse.</p> <p>Large stream crossing on edge of main landing – impressive scale of the crossing. Stream is of a relatively small size, however the topography of the crossing included fairly long steep banks, with excellent protection of the water resource and banks. Timber mats were used to cross along with poles and crossing was heavily brushed in. After crossing was removed, banks were hayed and good natural regeneration was viewed both from the hay seed and natural seed.</p> <p>Harvest completed in spring 2017, landing closeout delayed until July-Aug due to wet conditions on site and roads. Forester site closeout paperwork not yet completed.</p>
2	Success Pond Trail, 4 Plus Rd, and Chicawallopee Rd.	Infrastructure cost share for road upgrade/maintenance	Road into/out of Marshall Sale, viewed documentation for road and culvert improvement work along this stretch of road. NH Natural Heritage letter from 09/15/17, referencing NHB17-2872 with permit from NH DES.
3	Marshall Sale – site 2	Overstory removal and free thinning, with additional improvement thinning using a mark-to-cut in select areas.	<p>Mechanical crew, good slashing in of roads and protection of retained stems. Operator stayed out of certain areas and protected pulp and pole trees in young stands, bump trees left trailside to protect spruce/fir regeneration.</p> <p>Hemlock is not a prevalent species on the property and was retained where present; excellent retention of representative species and green tree retention.</p> <p>Boundaries well marked, BWA removal – not specifically noted in initial prescription as harvest plan cruise was completed before BWA was identified as the reason for the drop, BWA information noted in GIS</p> <p>Maintained enough canopy to limit white &amp; yellow birch epicormic sprouting</p>
4	Marshall Sale – site 3	Critical wetland habitat protection district - PS3B, Stearns Brook, Patch cuts	Viewed the 400' buffer on the PD3 Stream. Differing prescriptions noted within a 10-year period from the stream edge out to 200' and in the 201'-400' buffer area.

			<p>Harvest parameters can be exceeded with permission from the State of NH; at this site the normal regulated prescription was used in consultation with the NHF&amp;G's Wildlife biologist (in an adjacent harvest, permission was sought to exceed the NH F&amp;G parameters for a protection district and was approved due to declining balsam fir present).</p> <p>Viewed old retained patches - left for habitat variety.</p> <p>Retention patches within the 400' protected area.</p>
5	Grande Marie	<p><b>269 ac harvest, closed, 6521-ST-04:</b> OSR and combined group &amp; individual tree selection, &amp; free thinning. Adjacent to Marshall Sale, protection district – deer wintering area</p>	<p>Mechanical crew, winter sale needed frozen conditions due to wet soils. Log landings showed good utilization, low residual stem damage, regeneration protected.</p> <p>Marten habitat at N side of sale noted on maps.</p> <p>Retained large white pines for osprey habitat.</p> <p>Larger patch cuts in an area of declining softwood,</p> <p>Patch cuts are beneficial to wildlife habitat; this stand type may be used by Lynx.</p> <p>Protection district – deer wintering yard: Balsam fir are collapsing - deer wintering area protection district respected, with exception granted for stand 1422 by NHF&amp;G for some additional thinning to remove fir due to forest health problem with BWA. NHF&amp;G's Wildlife biologist visited the site and approved silvicultural prescription edits to exceed regulated opening size in the Protection District, due to balsam decline &amp; the need for patches of early successional habitat in protection district. Excellent written communication with the Wildlife Biologist.</p> <p>Stream crossing viewed permitted by state – metal stringers with wooden deck in good condition.</p> <p>Viewed landowner letter asking permission to train bird dogs.</p>
6	Leavitt Stream	<p><b>443 ac harvest, closed, 6521-ST-02:</b> Stream crossing, legal right-of-way on private woods road</p>	<p>Feller buncher &amp; grapple skidder, winter sale with frozen conditions.</p> <p>Legal ROW on private road used to access the sale. Boundary line clearly viewed on edge of property. Stream crossing permitted 02/20/14 and well completed. Moose trail evident at stream.</p> <p>Inspection forms viewed from multiple dates in Jan to March 2016, including 03/14/16 with note to pull bridge after all wood is trucked</p>

<b>Garcia River Forest – October 5, 2017</b>			
<b>Site #</b>	<b>Name</b>	<b>Feature of interest</b>	<b>Audit team notes</b>
8:15	Auditors arrive @ Caspar Office	Opening Meeting and FMU & District Briefs	Overview of California project and changes over past year. Review of selected field sites, possible changes to include active harvests, and the daily itinerary.
1	Olsen Gulch Road	Road conditions on main haul road, including many culvert crossings	In 2009-2010 this road received significant road upgrade funded by an EPA mitigation settlement (Pulte Homes), including rolling dips, out-sloped road profile with limited use of inside ditches, critical dips paired with culverts, and all culverts sized for 100-year flood. Road drainage provisions functioning well, with very limited areas with tire-track depressions, so re-grading is scheduled for 2018.
2	Culvert, Olsen Gulch Road	Culvert design and function	Culverted crossing with a bolted-on full-round downspout. Some “bed load” sediment at inlet.
3	Water Tank	Design and maintenance to avoid damage to fish	Large plastic water tank for road watering. Intake pipe is located far upstream and has screened intake.
4	Culvert, Olsen Gulch Road	Culvert design and function	Culverted crossing placed at grade below voluminous fill, which will increase impact to stream when it must be replaced in 30-40 years
5	Culvert, Olsen Gulch Road	Culvert design and function	Culverted crossing with a bolted-on half-round downspout. Some “bed load” sediment at inlet behind the trash-rack at the inlet.
6	Culvert, Olsen Gulch Road	Culvert design and function	Another large culvert crossing, this one paired with a nearby small culvert that is moving water from a small spring-seepage at the base of a legacy landslide that had buried the stream channel long ago.
7	Bridge, Olsen Gulch Road	Bridge design and function	Bridge design is railcar stringer with a newer wooden deck. When this bridge was rebuilt in the mid-90’s the work included in-stream habitat improvement including redwood cross-log weirs to create pools and Adler logs which sprouted to create stream habitat and shade
8	Garcia River Ecological Reserve		
9, 10	Olsen Gulch THP, general description	Active selection harvest by tractor logging and cable skyline logging; NSO activity center	263 acres of second and third-growth Redwood forest were selectively marked, removing about 15% of the volume. Portions are inside of the Ecological Reserve. As part of THP company upgraded haul road and selected crossings. There is one NSO activity center (MD492) within the plan boundary and six others within 1.3 miles. Plan states that there is no need to control hardwoods in the THP area. This harvest was also inspected during the 2016 audit. *
9	Olsen Gulch THP, active logging side	Interviews with LTO and several crew members	
10	Olsen Gulch THP, active unit	Residual stand conditions, Close-out measures	Scott Kelly inspected waterbars on several tractor trails that he determined to be substandard. He told the crew leader that the water bars must be reconstructed to standard. There was very minimal residual damage. Light selection appropriate to silvicultural goals. One wildlife tree marked with “W” and other retained trees having good wildlife features. WLPZ Class 2 flagged and Class 3 flagged; both types were protected per FPA rules. Special interest site also flagged out.



## The Conservation Fund – Bullard WMA Tract and Pembroke Tract

### October 26, 2017

**Timber Harvest #6** – 148 Acre 1<sup>st</sup> Thinning, 4<sup>th</sup> Row and between. Harvesting by Pierce Timber – Brian Peacock – Trained logger # 3725. Timber Sales Contract – Pay-As-Cut # 201606 contains requirement for BMPS. Harvesting Contract, Appendix A - Contract Provisions contain requirements for BMP compliance and logger training.

Witnessed Harvest Plan. No Gopher Tortoise identified. Some damage from Hurricane Irma. Aesthetics requires no decks on highway. Minimal skinning. Minor drains protected. Diversity with surrounding age classes.

**Planting – Compartment 1** – 94 Acres. Area was harvested when acquired. Chemical site preparation during October, 2016. Vertical Vegetative Management (Taylor Freeman licensed) and B&S Air, Inc. Rob Williams licensed) conducted chemical applications. Application report and flight lines witnessed. No issues. Hand planted on 6X10 spacing. Planting by Green Mountain Forestry, LLC, Randall Allen. Elite Loblolly from Bellville Super Tree Nursery. Visually monitor during planting. During September, 2017, seedling survival monitored by random plots – 93%. May chemically release in May, 2018. State may burn at age 10.

**Timber Harvest #7** – 223 Acre 1<sup>st</sup> Thinning, 4<sup>th</sup> Row and between. Active sale. Harvesting by TAR Land & Timber, LLC – Chris Lloyd # 4758. Timber Sales Contract – Pay-As-Cut # 201606 contains requirement for BMPS. Harvesting Contract, Appendix A - Contract Provisions contain requirements for BMP compliance and logger training. Spill kit on site. GA DNR has located and flagged Gopher Tortoise burrows. Clusters have been painted out of the sale area. No entrance in area. Debris used to stabilize skid trails. Minimal skinning of residual stand.

**Timber Harvest #3** – 166 Acre Clearcut. Harvesting by Murray Logging – Gerome Murray # 1226. Timber Sales Contract – Pay-As-Cut # 201606 contains requirement for BMPS. Harvesting Contract, Appendix A - Contract Provisions contain requirements for BMP compliance and logger training. Burrows flagged prior to harvesting and discussed during pre-harvest meeting. During site visit by GA DNR it was identified that the burrows and clusters were not being protected during harvesting. Logging job was shut down and corrective action implemented. GA DNR provided a map of the burrows following the incident. Corrective action has been completed. See Corrective Action Request (CAR) for CFI Bullard WMA Tract dated 1-30-2017.

Site will be replanted with containerized Longleaf Pine to restore Longleaf Pine ecosystem. State will burn to implement habitat.

**Timber Harvest #9** – 65 Acre Clearcut. Harvested by Pierce Timber Company, Inc. – Brian Peacock # 3725. Timber Sales Contract – Lump Sum contains requirement for BMPS. Harvesting Contract, Appendix A - Contract Provisions contain requirements for BMP compliance and logger training. Map has Gopher Tortoise in area. None on sale. SMZs delineated marked with paint and flagging. Wide SMZs with no entrance. Good utilization. Ephemeral drain crossing. Debris removed. No issues.

**Timber Harvest #1** – 82 Acre 1<sup>st</sup> Thinning, 4<sup>th</sup> Row and between. Harvested by Pierce Timber Company, Inc. – Brian Peacock # 3725. Timber Sales Contract – Pay-As-Cut contains requirement for BMPS. Harvesting Contract, Appendix A - Contract Provisions contain requirements for BMP compliance and logger training. Deck off road for aesthetics. Some damage from Hurricane Irma. Minimal skinning. No water to consider. No issues.

**Timber Harvest #2** – 66 Acre Clearcut. Harvested by Pierce Timber Company, Inc. – Brian Peacock # 3725. Timber Sales Contract – Pay-As-Cut contains requirement for BMPS. Harvesting Contract, Appendix A - Contract Provisions contain requirements for BMP compliance and logger training. SMZ painted. No issues.

Vertical Vegetative Management (Taylor Freeman licensed) and B&S Air, Inc. Rob Williams licensed) conducted chemical applications for site preparation. Application report and flight lines witnessed. No issues.

Conservation easement is being developed with Ft. Stewart to prevent encroachment by Pembroke.

**Planting – Compartment 28** – 65 Acres. Planting bare root Loblolly Pine on bed developed prior to acquisition. Vertical Vegetative Management (Taylor Freeman licensed) and B&S Air, Inc. Rob Williams licensed) conducted chemical site preparation. Application report and flight lines witnessed. No issues. Planting by Green Mountain Forestry, LLC, Randall Allen. Elite Loblolly from Bellville Super Tree Nursery. Flooding has impacted with 87% survival.