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

The Conservation Fund

Working Forest Fund and Related Properties

SCS-FM/COC- 00102N

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CERTIFIED	EXPIRATION
21 December 2012	20 December 2017

DATE OF FIELD AUDIT
7-8, 27-29, October 2014
DATE OF LAST UPDATE
27 February 2015

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Foreword

Cycle in annual surveillance audits			
☐ 1st annual audit	☒ 2nd annual audit	☐ 3rd annual audit	☐ 4th annual audit
Name of Forest Management Enterprise (FME) and abbreviation used in this report:			
The Conservation Fund (TCF)			

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

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

- A focused assessment of the status of any outstanding conditions or Corrective Action Requests (CARs; see discussion in section 4.0 for those CARs and their disposition as a result of this annual audit);
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior to this audit; and
- As necessary given the breadth of coverage associated with the first two components, an additional focus on selected topics or issues, the selection of which is not known to the certificate holder prior to the audit.

Organization of the Report

This report of the results of our evaluation is divided into two sections. Section A provides the public summary and background information that is required by the Forest Stewardship Council. This section is made available to the general public and is intended to provide an overview of the evaluation process, the management programs and policies applied to the forest, and the results of the evaluation. Section A will be posted on the FSC Certificate Database (http://info.fsc.org/) no less than 90 days after completion of the on-site audit. Section B contains more detailed results and information for the use by the FME.

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Annual Audit Team

Auditor Name:	Brendan Grady	**Auditor role**:	FSC Lead Auditor
Qualifications:	Mr. Grady is the Director, Forest Management Certification for SCS. In that role, he provides daily management and quality control for the program. He participated as a team member and lead auditor in forest certification audits throughout the United States, Europe, and South East Asia. Brendan has a B.S. in Forestry from the University of California, Berkeley, and a Juris Doctorate from the University of Washington School of Law. Brendan is a member of the State Bar of California, and was an attorney in private practice focusing on environmental law before taking his current role at SCS.		
Auditor Name:	Mike Ferrucci	**Auditor role**:	SFI lead auditor, FSC team auditor.
Qualifications:	Mike Ferrucci is the SFI Program Manager for NSF – International Strategic Registrations and is responsible for all aspects of the firm's SFI Certification programs. He is qualified as a RAB-QSA Lead Auditor (ISO 14001 Environmental Management Systems), as an SFI Lead Auditor for Forest Management, Procurement, and Chain of Custody, as an FSC Lead Auditor Forest Management and Chain of Custody, as a Tree Farm Group Certification Lead Auditor, and as a GHG Lead Auditor. Mike has led Sustainable Forest Initiative (SFI) certification and precertification reviews throughout the United States. He has also led or participated in joint SFI and Forest Stewardship Council (FSC) certification projects in nearly one dozen states and a joint scoping or precertification gap-analysis project on tribal lands throughout the United States. He also co-led the pioneering pilot dual evaluation of the Lakeview Stewardship Unit on the Fremont-Winema National Forest. Mike Ferrucci has 33 years of forest management experience. His expertise is in sustainable forest management planning; in certification of forests as sustainably managed; in the application of easements for large-scale working forests, and in the ecology, silviculture, and management of mixed species forests, with an emphasis on regeneration and management of native hardwood species. Mike has conducted or participated in assessments of forest management operations throughout the United States, with field experience in 4 countries and 33 states. Mike has been a member of the Society of American Foresters for over thirty-five years. He is Past Chair of the SFI Auditor's Forum. Mike is also a Lecturer at the Yale School of Forestry and Environmental Studies, where he has taught graduate courses and workshops in forest management, harvesting operations, professional forest ethics, private forestry, and financial analysis.		
Auditor Name:	Norman Boatwright	**Auditor role**:	Team auditor
Qualifications:	Norman Boatwright is the president of Boatwright Consulting Services, LLC located in Florence, South Carolina. BCS handles typical forestry consulting, SFI, ATF and FSC Audits, Phase I Environmental Site Assessments, Forest Soil Mapping, Wetland Delineation, and other Biological Services. Norman has over twenty-nine years'		

	experience in intensive forest management, eighteen years' experience in environmental services and ten years' experience in forest certification auditing. He has conducted Phase I Assessments on over three hundred and fifty projects covering 3,000,000 acres, Endangered Species Assessments on timberland across the South, and managed soil mapping projects on over 1.3 million acres. From 1985-1991, he was Division Manager at Canal Forest Resources, Inc. and was responsible for all forest management activities on about 90,000 acres of timberland in eastern South Carolina. Duties included budgeting and implementing land and timber sales, site preparation, planting, best management practices, road construction, etc. From 1991-1999, he was manager of Canal Environmental Services which offered the following services: Phase I Environmental Site Assessments, Wetland Delineation and Permitting and Endangered Species Surveys. From 1999-2012 he was the Environmental Services Manager, Milliken Forestry Company. Norman has extensive experience auditing SFI, procurement and land management organizations and American Tree Farm Group Certification Programs. He is also a Lead Auditor for Chain of Custody Audits under SFI, PEFC, and FSC		
Auditor Name:	Scott Berg	**Auditor role**:	Team auditor
Qualifications:	Mr. Berg is the principal in the international consulting firm, R.S. Berg & Associates, Inc. that provides a full range of consulting and auditing services to the SFI, FSC, ISO 14001 EMS and Tree Farm Certification Standards. He has over thirty five years in the forest and paper industry working for national and regional trade associations, and as the owner of a consulting firm. He has had major responsibilities in developing and implementing the Sustainable Forestry Initiative Standard and Certification Procedures, as well as the American Tree Farm System Group Certification Program. He has prepared approximately two hundred (200) clients to achieve independent certification to the Standard of their choice. He is an ISO 14001 trained Lead Auditor and has conducted approximately forty internal and independent audits to the full range of forest certification Standards. He has represented the U.S. forest and paper industry before a number of international standards bodies including: Technical Committee 207 of the International Standards Organization (ISO), the Economic Commission for Europe (ECE) Timber Committee, and the Pan European Forest Certification Council (PEFCC). Scott has also represented the forest and paper industry before congress and the federal agencies addressing private forest policy and research issues.		

1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	4
B. Number of auditors participating in on-site evaluation:	2
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	1
D. Total number of person days used in evaluation:	**9**

1.3 Standards Employed

1.3.1. Applicable FSC-Accredited Standards

Title	Version	Date of Finalization
FSC US Forest Management Standard	1.0	July 2010

All standards employed are available on the websites of FSC International (www.fsc.org), the FSC-US (www.fscus.org) or the SCS Standards page (www.scsglobalservices.com/certification-standards-and-program-documents). Standards are also available, upon request, from SCS Global Services (www.SCSglobalServices.com).

2 Annual Audit Dates and Activities

2.1 Annual Audit Itinerary and Activities

Date: Oct 7 – Auditors Grady, Berg	
FMU / Location / sites visited	**Activities / notes**
TCF Office, Caspar, CA	Opening Meeting: Introductions, client update, review audit scope, audit plan, intro/update to FSC and SCS standards and protocols, review of open CARs/OBS, final site selection North Coast operations and monitoring protocol discussion
Salmon Creek Forest	Field tour. North Navarro Ridge THP - Selection harvest with goal of pine removal (it was overrepresented in the stand due to previous harvesting. Pygmy cypress area buffered out of the harvest unit. Logger interview. Pre-commercial thin completed in 2013, stand had been regenerated after even aged harvest under previous landowner.
Date: Oct 8 - Auditors Grady, Berg	
FMU / Location / sites visited	**Activities / notes**
Garcia River Forest	Field Tour; interview with CAL Fire inspector. Graphite THP – primarily single tree selection harvest with limited group openings. Discussion of marbled murrelet protection measures – area is designated as potential habitat, although surveys did not identify any individual murrelets in the unit. Extensive bridge replacement on Hollow tree road. Design standards in place to accommodate 100 year flood event. Associated culvert replacement and improvement along the road. Road and bridge work were done as mitigation measure in association with Log Hollow THP.
Date Oct 27 - Auditors Grady, Boatwright	
FMU / Location / sites visited	**Activities / notes**
Vision Forestry offices	Review of documentation and management planning, and monitoring records. Demonstration of GIS system. Discussion of forest products market in Delmarva peninsula.
Date: Oct 28 - Auditors Grady, Boatwright	
FMU / Location / sites visited	**Activities / notes**
Chesapeake Forest, VA	Field tour, site review of recently completed first thinning, and final harvest in planted pine stands.
Date: Oct 29 - Auditors Grady, Ferrucci	
FMU / Location / sites visited	**Activities / notes**
East Grand Lake, ME	Review of documentation and management planning, monitoring protocols, social outreach efforts by TCF in the local community.

	Field tour including silvicultural planning. Road work recently completed, fixing crushed culverts that had failed, and improvement of cross ditch catchment areas. No harvests are planned on this property in the near future, the roadwork is an investment in maintaining access.

2.2 Evaluation of Management Systems

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

3. Changes in Management Practices

No significant changes to management practices occurred since the previous audit.

4. Results of the Evaluation

4.1 Existing Corrective Action Requests and Observations

	Finding Number: 2013.1
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU): All	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☐ Next audit (surveillance or re-evaluation) ☒ Other deadline (specify): No deadline
FSC Indicator:	7.3.a
Background: TCF North Coast Forest Program has a training plan identifying topics required for training different positions. However, training logs filled out for staff holding those positions do not align with the training topics detailed on the plan. Training logs typically listed external trainings such as conferences, but not the basic trainings laid out in the plan. Thus, there is a disconnect between the two documents, making it difficult to assess whether all staff had received necessary training. Interviews confirmed that various on the job trainings had occurred that were not recorded.	
Observation: TCF could improve its training records to better align with training plans.	
FME response *(including any evidence submitted)*	
SCS review	TCF adjusted its training record system in order to more accurately reflect whether or not training activities were meeting the training plan. New training records from prior year were reviewed.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2013.2
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU): Bobcat Ridge and Success Pond	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	6.5.d
Non-Conformity: Two road maintenance issues were present at two different FMUs. In Bobcat Ridge, the road bank above a recently installed culvert was beginning to fail and in danger of blocking the culvert. In Success Pond, a culvert had been blocked by beaver activity, resulting in a pond being created beside the road, and the stream flowing over the road creating a new channel.	
Corrective Action Request: TCF's transportation system must be designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, soil and water disturbance, and cumulative adverse effects.	
FME response *(including any evidence submitted)*	Bobcat ridge – reset culvert, road grading and stabilization. Success pond – cleaned out culvert, installed a beaver deceiver device. Have been able to check on culvert to ensure its success.
SCS review	The two culvert issues identified during the previous audit were adequately repaired. Photo evidence was reviewed.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number:2013.3
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU): Bobcat Ridge	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	7.1.b
Non-Conformity: The management plan for Bobcat Ridge did not include a description of the land use history of the property.	
Corrective Action Request: TCF management plan must describe the history of land use and past management.	
FME response *(including any evidence submitted)*	Added section on past ownership to management plan.
SCS review	Auditor confirmed that the new sections were added to the management plan.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number:2013.4
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU): Bobcat Ridge and Success Pond	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	7.1.f
Non-Conformity: The management plan for Bobcat Ridge included a general description of invasive species concerns in the region where the property is located, but did not have specific information on what invasive species if any were present on the property. The management plan for Success Pond indicated that no invasive species were present, when in fact a small population of *Phragmites* spp. was known to be present by the forest managers.	
Corrective Action Request: If invasive species are present, the management plan describes invasive species conditions, applicable management objectives, and how they will be controlled.	
FME response *(including any evidence submitted)*	Bobcat ridge list of endangered species was added along with control measures. Success pond management plan updated to include identified invasive species
SCS review	Auditor confirmed that the adjustments were made to the management plan.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number:2013.5
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU): Bobcat Ridge and Success Pond	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	7.1.j
Non-Conformity: The management plans for Bobcat Ridge and Success Pond did not include an evaluation of social impacts.	
Corrective Action Request: TCF management plans must incorporate the results of the evaluation of social impacts, including: • traditional cultural resources and rights of use (see Criterion 2.1); • potential conflicts with customary uses and use rights (see Criteria 2.2, 2.3, 3.2); • management of ceremonial, archeological, and historic sites (see Criteria 3.3 and 4.5); • management of aesthetic values (see Indicator 4.4.a); • public access to and use of the forest, and other recreation issues; • local and regional socioeconomic conditions and economic opportunities, including creation and/or maintenance of quality jobs (see Indicators 4.1.b and 4.4.a), local purchasing opportunities (see Indicator 4.1.e), and participation in local development opportunities (see Indicator 4.1.g).	
FME response *(including any evidence submitted)*	Revised sections of the management plans including social impact evaluation were added.
SCS review	Auditor confirmed that the adjustments were made to the management plan.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number:2013.6
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU): Bobcat Ridge	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	7.1.k
Non-Conformity: The management plan for Bobcat Ridge did not include a description of the transportation network.	
Corrective Action Request: TCF management plans must describe the general purpose, condition and maintenance needs of the transportation network (see Indicator 6.5.e).	
FME response *(including any evidence submitted)*	Sections added to management plan. Monitoring occurs as part of annual monitoring forms.
SCS review	Auditor confirmed that the adjustments were made to the management plan.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number:2013.7
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU): Success Pond	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	6.4.a & b
Non-Conformity: The description of representative sample areas in the Success Pond management plan has combined the concepts of representative sample area and legacy trees. The plan has classified white pine trees as legacy trees and also representative sample areas. While this shows conformance to the legacy tree requirements in 6.3.f, it is not clear how the RSA requirements have been met.	
Corrective Action Request: TCF must document the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the landscape. Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes.	
FME response *(including any evidence submitted)*	Have considered RSAs for unique classifications but not for the more general common forest types.
SCS review	The management plan references the Engstrom report, as the basis for its RSA determination (a "Natural Resources Inventory Report" conducted by a consulting ecologist). This report identified natural areas of ecological significance on the FMU. However, it did not assess the adequacy of their representation and protection of these communities in the landscape outside the FMU. Also, the report did not analyse the more commonly occurring plant communities. While some of the source data pertaining to the FMU has been gathered to complete an RSA assessment, it has not been considered in the landscape context in order to form a basis for a decision to designate (or not designate) RSAs. Therefore, the CAR cannot be closed and is upgraded to a Major CAR. 2/16/15 Update: A revised management plan for Success Pond was reviewed, including an expanded section on RSAs. TCF reviewed data from the NH Natural Heritage Bureau and USGS Protected Area database and compared these to the natural areas iexisting on the FMU. This analysis confirmed that community types present on the forest are well represented in existing protected areas in the landscape. Thus no additional RSAs were warranted for designation. This additional information closes the CAR.

Status of CAR:	☐ Closed ☐ Upgraded to Major ☒ *Other decision: CAR upgraded to Major but closed prior to finalization of this report.*

	Finding Number:2013.9
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU): Success Pond	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	7.1.e
Non-Conformity: As described in 2013.7, the management plan for Success Pond does not include a correct understanding of RSAs.	
Corrective Action Request: TCF management plans must include a description of Representative Sample Areas and outlines activities to conserve and/or protect them.	
FME response *(including any evidence submitted)*	Management plan was updated to contain correct references to RSAs as spatial units rather than individual trees as in the previous plan, and the results of a completed RSA assessment.
SCS review	Auditor confirmed that the adjustments were made to the management plan. Not clear if the appropriate RSA analysis was done. (See CAR 2013.8)
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number:2013.10
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU): Success Pond	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	7.1.n
Non-Conformity: The Success Pond management plan does not include a description of monitoring procedures.	
Corrective Action Request: The management plan includes a description of monitoring procedures necessary to address the requirements of Criterion 8.2.	
FME response *(including any evidence submitted)*	A monitoring plan was included in the revised management plan (page 50).
SCS review	Auditor confirmed that the adjustments were made to the management plan.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number:2013.11
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU): Success Pond	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	9.2.a
Non-Conformity: The Success Pond management plan includes a section on HCVF. The section describes HCVF values, but concludes that none are present without a clear explanation. It could be the case that no HCVF values are present, but other TCF documents indicate this is unlikely. TCF has done some outreach to external stakeholders and experts about identifying HCVF values, including a biological survey by an outside ecologist, some of which has indicated that some ecologically significant natural communities are present. In addition the application for Forest Legacy funding also emphasizes the general conservation value of the property.	
Corrective Action Request: TCF must consult with stakeholders and experts to confirm that proposed HCVF locations and their attributes have been accurately identified, and that appropriate options for their maintenance have been adopted.	
FME response *(including any evidence submitted)*	Provided Engstrom biological survey and correspondence with New Hampshire state wildlife personnel to confirm the findings.
SCS review	TCF completed its HCVF analysis on this FMU, resulting in the designation of some wetland areas as HCVF 4.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number:2013.12
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU): All FMUs outside of California	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	7.4.a
Non-Conformity: Summaries of management plans are not available for all the FMUs in the scope of the expanded certificate. The full management plans for the California properties are clearly accessible on the TCF website. Summaries for the new properties exist, but not in enough detail as required by the indicator.	
Corrective Action Request: Management plans or a management plan summary that outlines the elements of the plan described in Criterion 7.1 must be made available to the public.	
FME response *(including any evidence submitted)*	Mgt plan summaries were created and put on the website for the WFF properties: http://www.conservationfund.org/our-conservation-strategy/focus-areas/conservation-ventures/working-forest-fund/
SCS review	Management plan summaries were reviewed to confirm that all required elements of the summaries were met.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number:2013.13
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU): All FMUs outside of California	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☐ Next audit (surveillance or re-evaluation) ☒ Other deadline (specify): prior to the sale of certified material from FMUs added to the certificate this year.
FSC Indicator:	8.3.a; SCS CoC Indicators for Forest Management Enterprises
Non-Conformity: Chain of custody procedures are in place for the existing properties in California, but have not been developed for the properties included in the scope expansion this year.	
Corrective Action Request: Prior to selling FSC certified material from the expanded scope properties, TCF must develop a chain of custody system that conforms to the SCS Chain of Custody Indicators for Forest Management Enterprises.	
FME response *(including any evidence submitted)*	See the updated COC procedure dated November 22, 2013.
SCS review	TCF developed a COC procedure for all of the FMUs currently within the scope of the certificate that complies with SCS' COC indicators for FMEs. No mixing of certified and non-certified material will occur prior to the first point of sale.
Status of CAR:	☒ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

4.2 New Corrective Action Requests and Observations

	Finding Number: 2014.1
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	SCS CoC Indicators for Forest Management Enterprises 3.2 (see also FSC-STD-50-001 (V1-2), indicator 1.15 and Annex 1).
Non-Conformity *(or Background/ Justification in the case of Observations)*: Examples of the use of Forest Stewardship Council trademarks were observed without the required registered trademark symbol.	
Corrective Action Request *(or Observation)*: The appropriate symbol shall be added to "FSC" or "Forest Stewardship Council" for the first use in any text. The registration status of the FSC trademarks for the respective country is listed in Annex 1 of FSC-STD-50-001 (V1-2).	

FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2014.2
Select one: ☐ **Major CAR** ☐ **Minor CAR** ☒ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	FSC-US Forest Management Standard v1.0, 8.2.d.3
Non-Conformity *(or Background/ Justification in the case of Observations)*: Methods of monitoring relevant socio-economic issues vary considerably from FMU to FMU. The California properties calculate an annual estimate of economic impact. For East Grand Lake, an annual community benefits summary is produced as a loan requirement. However, for the Eastern Shore Forests there was a recent study conducted that included economic impact data that could serve as a baseline, but there does not appear to be a regular protocol for socio-economic monitoring.	
Corrective Action Request *(or Observation)*: TCF should improve its processes for monitoring socio-economic issues to ensure that this consistently takes places across the entire scope of the forests in the certificate.	
FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2014.3
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	FSC-US Forest Management Standard v1.0, 8.5.a

Non-Conformity *(or Background/ Justification in the case of Observations)*: A public summary of monitoring results is not available for all FMUs in the scope of the certificate. An annual summary of monitoring efforts and results for the California properties is published as part of an annual report, but no corresponding summary exists for other the other properties.	
Corrective Action Request *(or Observation)*: While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.	
FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

	Finding Number: 2014.4
Select one: ☐ **Major CAR** ☒ **Minor CAR** ☐ **Observation**	
FMU CAR/OBS issued to (when more than one FMU):	
Deadline	☐ Pre-condition to certification ☐ 3 months from Issuance of Final Report ☒ Next audit (surveillance or re-evaluation) ☐ Other deadline (specify):
FSC Indicator:	FSC-US Forest Management Standard v1.0, 9.1.a and 9.1.b
Non-Conformity *(or Background/ Justification in the case of Observations)*: An HCVF checklist was completed for the Eastern Shore Forests as an appendix to the management plan. The checklist indicated that no HCVF was present, but did not provide any justification for this determination. It was also unclear whether this determination underwent consultation with outside experts or stakeholders in order to confirm its accuracy.	
Corrective Action Request *(or Observation)*: In developing their HCVF assessment, TCF must consult with qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.	
FME response *(including any evidence submitted)*	
SCS review	
Status of CAR:	☐ Closed ☐ Upgraded to Major ☐ *Other decision (refer to description above)*

5. Stakeholder Comments

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

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

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

5.1 Stakeholder Groups Consulted

Logging contractors	Regulatory agencies

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

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

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

Stakeholder comments	SCS Response
Economic	
None received.	
Social	
TCF is a preferred landowner to work for. They care about the property and that shows in their management style.	Noted as evidence of conformance.
Environmental	
No recent examples of regulatory infractions on TCF	Noted as evidence of conformance.

forests.	

6. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual audit team recommends that the certificate be sustained, subject to subsequent annual audits and the FME's response to any open CARs.	**Yes** ☒ **No** ☐
Comments:	

7. Changes in Certification Scope

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

Scope of Certificate

Certificate Type	☐ Single FMU	☒ Multiple FMU		
	☐ Group			
SLIMF (*if applicable*)	☐ Small SLIMF certificate	☐ Low intensity SLIMF certificate		
	☐ Group SLIMF certificate			
# Group Members (*if applicable*)				
Number of FMU's in scope of certificate	10			
Geographic location of non-SLIMF FMU(s)	*Latitude & Longitude:*			
Forest zone	☐ Boreal	☒ Temperate		
	☐ Subtropical	☐ Tropical		
Total forest area in scope of certificate which is:			**Units:** ☐ **ha or** ☒ **ac**	
privately managed	109,075			
state managed	0			
community managed	0			
Number of FMUs in scope that are:				
less than 100 ha in area	0	100 - 1000 ha in area	0	
1000 - 10 000 ha in area	10	more than 10 000 ha in area	0	
Total forest area in scope of certificate which is included in FMUs that:			**Units:** ☐ **ha or** ☒ **ac**	
are less than 100 ha in area	0			
are between 100 ha and 1000 ha in area	0			
meet the eligibility criteria as *low intensity* SLIMF FMUs	0			
Division of FMUs into manageable units:				
Divided among 10 properties in California: Garcia River Forest – 24,000 acres; Gualala Forest – 14,000 acres;				

Big River and Salmon Creek – 16,000 acres; Buckeye Forest – 18,120 acres; Texas: Bobcat Ridge – 7,051 acres; Vermont: McConnell Pond – 4,500 acres; Maine: East Grand Lake – 5,947 acres; Pennsylvania: Penfield Forest – 2,041 acres; Virginia: Chesapeake Forest – 8,600 acres; New Hampshire: Success Pond – 8,900 acres

Production Forests

Timber Forest Products	**Units: ☐ ha or ☒ ac**
Total area of production forest (i.e. forest from which timber may be harvested)	92,032
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	5,074
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	86,985
Silvicultural system(s)	**Area under type of management**
Even-aged management	12,509
Clearcut (clearcut size range)	
Shelterwood	
Other:	
Uneven-aged management	79,523
Individual tree selection	
Group selection	
Other:	
☐ Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	
The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	
Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	
Other areas managed for NTFPs or services	
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	
Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest rates estimates are based:	
Management plans include discussion or documentation with model outputs or other rationale explaining assumptions for Annual Allowable Harvest rates.	
Species in scope of joint FM/COC certificate: *Scientific/ Latin Name* (Common/ Trade Name)	
Abies balsamea, Abies concolor, Acer rubrum, Acer saccharum, Alnus rubra, Betula alleghaniensis,	

Betula nigra, Betula papyrifera, Carya spp., Fagus grandifolia, Fraxinus americana, Fraxinus nigra, Larix laricina, Liquidambar styraciflua, Liriodendron tulipifera, Notholithocarpus densiflorus, Picea glauca, Pinus lambertiana, Picea mariana, Picea rubens, Pinus strobus, Pinus taeda, Populus balsamifera, Populus grandidentata, Populus tremuloides, Prunus serotina, Pseudotsuga menziesii, Quercus alba, Quercus rubra, Quercus spp., Sequoia sempervirens, Thuja occidentalis, Tilia americana, Tsuga canadensis

FSC Product Classification

Timber products		
Product Level 1	**Product Level 2**	**Species**
W1	W1.1 (Roundwood Logs)	All
W3	W3.1 (Wood chips)	*Abies balsamea, Acer rubrum, Acer saccharum, Betula alleghaniensis, Betula nigra, Betula papyrifera, Carya spp., Fagus grandifolia, Fraxinus americana, Fraxinus nigra, Larix laricina, Picea glauca, Picea mariana, Picea rubens, Pinus strobus, Populus balsamifera, Populus grandidentata, Populus tremuloides, Prunus serotina, Quercus alba, Quercus rubra, Quercus spp., Thuja occidentalis, Tilia americana, Tsuga canadensis*
Non-Timber Forest Products		
Product Level 1	**Product Level 2**	**Product Level 3 and Species**

Conservation Areas

Total area of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives	4,699 acres

High Conservation Value Forest/ Areas

High Conservation Values present and respective areas: **Units:** ☐ **ha or** ☒ **ac**

	Code	HCV Type	Description & Location	Area
☒	HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	North Coast, CA; Northern Spotted Owl habitat	2,737
☒	HCV2	Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance.		
☒	HCV3	Forests or areas that are in or contain rare, threatened or endangered	North Coast, CA; Oak woodlands and grasslands.	1,195

		ecosystems.		
[x]	HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	Class I Streams North Coast, CA Bottomland Hardwoods, TX Forested wetlands, NH Forested wetlands, ME	4,162
[x]	HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		
[x]	HCV6	Forests or areas critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).		
Total Area of forest classified as 'High Conservation Value Forest/ Area'				**8,094**

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

[ ] N/A – All forestland owned or managed by the applicant is included in the scope.	
[x] Applicant owns and/or manages other FMUs not under evaluation.	
[ ] Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.	
Explanation for exclusion of FMUs and/or excision:	The Conservation Fund is a national organization, with land holdings throughout the United States. The North Coast forests are the only properties owned by TCF in the Western states that support timber harvesting. TCF's other forested properties either: a) are not managed for timber, b) are set to be sold in the near future, or c) are in the process of becoming FSC-certified under a multiple FMU certificate.
Control measures to prevent mixing of certified and non-certified product (C8.3):	All properties where harvesting occurs use an invoicing system that must state the property of origin.

Description of FMUs excluded from or forested area excised from the scope of certification:

Name of FMU or Stand	Location (city, state, country)	Size ([ ] ha or [X] ac)
Rayonier	Long County, GA	3,000 ac
4 State Forest	NY, VT, NH, ME	30,250 ac
Twin Lakes	Iron County, WI	13,732 ac

8. Annual Data Update

8.1 Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
97 male workers	7 female workers	
Number of accidents in forest work since last audit 0	**Serious:** 0	**Fatal:** 0

8.2 Annual Summary of Pesticide and Other Chemical Use

☐ *FME does not use pesticides.*				
Commercial name of pesticide / herbicide	**Active ingredient**	**Quantity applied annually (kg or lbs)**	**Size of area treated during previous year**	**Reason for use**
Imazypyr	Imazypyr	130 lbs	271 ac	Tanoak reduction

SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – List of FMUs Selected For Evaluation

☐ FME consists of a single FMU

☒ FME consists of multiple FMUs or is a Group

SCS staff establishes the design and level of sampling prior to each group or multiple FMU evaluation according to FSC-STD-20-007. A list of the FMUs sampled and the rationale behind their selection is listed below.

FMU Name	FMU Size Category: - SLIMF - non-SLIMF - Large > 10,000 ha	Forest Type: - Plantation - Natural Forest	Rationale for Selection: - Random Sample - Stakeholder issue - Ease of access - Other – please describe
Salmon Creek Forest	Non-SLIMF	Natural	Recent Activity
Garcia River Forest	Non-SLIMF	Natural	Recent Activity
Chesapeake Forest	Non-SLIMF	Natural	Random sample
East Grand Lake	Non-SLIMF	Natural	Random sample

Appendix 2 – List of Stakeholders Consulted

List of FME Staff Consulted

Name	Title	Contact Information	Consultation method
Trevor Cutsinger	TCF Forest Operations Manager		Interview
Buck Vaughn	TCF Forest Analyst		Interview
Scott Kelly	North Coast Timberlands Manager		Interview
Holly Newberger	North Coast Program Director		Interview
Madison Thomson	Forester		Interview
Neil Sampson	Vision Forestry		Interview
Larry Walton	Vision Forestry		Interview
Bill Cheesman	Vision Forestry		Interview
Laura Upham	Vision Forestry		Interview

Tom Boutureira	TCF New England Field Representative		Interview
Joel Philbrook	Huber Resources Corp		Interview
Kenny Ferguson	Huber Resources Corp		Interview

List of other Stakeholders Consulted

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Ken Margiott	CAL Fire		Interview	N
Robert Piper	Contract logger		Interview	N

Appendix 3 – Additional Audit Techniques Employed

No additional audit techniques were employed.

Appendix 4 – Pesticide Derogations

[x] There are no active pesticide derogations for this FME.		
Name of pesticide / herbicide (active ingredient)		**Date derogation approved**
Condition	**Conformance (C / NC)**	**Evidence of progress**

Appendix 5 – Detailed Observations

Evaluation Year	FSC P&C Reviewed
2012	All – (Re)certification Evaluation
2013	P6, P7, P9
2014	P8 + obligatory criteria
20XX	
20XX	

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

C 6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.	C	
6.2.a. If there is a likely presence of RTE species as identified in	C	State natural heritage database is reviewed as part

Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present. Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.		of the planning process, and listed species are assumed to be present. CA: Species requiring the most attention is the northern spotted owl. Trained members of the staff conduct owl surveys prior to harvest, and identify owl activity centers ("circles") in harvest plans. 2014: VA In order to check for presence of RTE species, forestry staff gets a shape file from a state heritage group. Most common hits are bald eagle radiuses, which required a 330 ft no harvest radius, and an additional 330 no harvest during nesting. Sometimes they get hits in hardwood bottomland forest type, which are areas that are not harvested anyway. GIS system and RTE shape file was reviewed by the audit team. ME: An extensive environmental survey was conducted of the property in 2012 as part of application for federal Forest Legacy funds ("East Grand Watershed Initiative Preliminary Ecological Assessment" by Janet McMahon). Including field surveys and reviewing available databases. The only state listed threatened species is a mussel occurring in the neighboring East Grand Lake.
6.2.b. When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. ***Conservation zones*** and/or ***protected areas*** are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.	C	CA: Owl circles are identified prior to harvest, and harvesting is restricted in these areas. Salmonid streams receive additional protection measures mandated by the California forest practice rules. VA: see 6.2.a for protection measures ME: Conservation zones include no harvest buffers for water quality areas, examples of enriched northern hardwood forest, red and white pine forest.
6.2.c. For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as landscape level biodiversity conservation goals.	NA	
6.2.d. Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).	C	CA: Dedicated security staff regularly patrol the forest. VA: all properties are leased to hunting clubs who control unauthorized activities on the forest. Vision forestry staff is dedicated to hunt club management ME: no hunting leases in place. RTE species on the property are not of the sort usually collected.
C6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.	C	

C6.3.a. Landscape-scale indicators		
6.3.a.1. The forest owner or manager maintains, enhances, and/or restores under-represented ***successional*** stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.	C	CA: One of the goals of TCF's management is to accelerate a late seral successional stage, which is underrepresented on the landscape. This is accomplished through their focus on selection silviculture. VA: Forests are mostly inherited pine stands at mid-successional stage with few opportunities to recruit older community types. Areas of more significant ecological value were transferred to the state as part of the Chesapeake forest plan. ME: McMahon report included identification of areas suited for late seral development. Harvesting practices in these areas would be altered, although no harvesting has occurred on the property since TCF took over.
6.3.a.2. When a ***rare ecological community*** is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, ***conservation zones*** and/or ***protected areas*** are established where warranted.	C	CA: Rare ecological communities identified on the forest have typically been categorized as HCVF (pygmy forest, oak woodlands). These areas are not managed except as needed to maintain the values. VA: harvesting only occurs on planted pine stands, which are not classified as rare. ME: areas of Enriched Northern Hardwood forest Red and White Pine Forest were identified and reserved based on the McMahon report.
6.3.a.3. When they are present, management maintains the area, structure, composition, and processes of all ***Type 1*** and ***Type 2 old growth***. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values. Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate). Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g). On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate). On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations	C	No type 1 or type 2 old growth stands are present on any FMU, as confirmed through inventory and field reconnaissance records. Individual scattered old growth trees are not harvested per TCF's policy.

where: 1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 5. Conservation zones representative of old growth stands are established. 6. Landscape level considerations are addressed. 7. Rare species are protected.		
6.3.b. To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.	C	TCF's management focus is aimed at restoring habitat conditions associated with late seral species. Properties in VA and ME generally do not meet the definition of large forest here. But the properties were acquired based on their ability to provide conservation benefits to a larger network of working forestland.
6.3.c. Management maintains, enhances and/or restores the plant and wildlife habitat of ***Riparian Management Zones (RMZs)*** to provide: a) habitat for aquatic species that breed in surrounding uplands; b) habitat for predominantly terrestrial species that breed in adjacent ***aquatic habitats***; c) habitat for species that use riparian areas for feeding, cover, and travel; d) habitat for plant species associated with riparian areas; and, e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.	C	CA: TCF actively manages their riparian areas to enhance habitat features. Examples include active placement of large woody debris in streams in order to increase diversity in stream flow. VA: Buffer zones are put in place, as required in the standard and state best management practices. ME: Riparian buffer zones are used in accordance with the standard requirements. No current plans for timber harvesting. Extensive culvert repair work was done in the prior year and reviewed by the audit team.
Stand-scale Indicators 6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.	C	Management goals detailed in management plans include maintaining the natural distribution of plant species on the site. Field sites visited demonstrate that these goals are being met over time.
6.3.e. When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. ***Native species*** suited to the site are normally selected for regeneration.	C	CA & ME: Limited amount of planting is done when natural regeneration is insufficient. Planting stock is from appropriate seed zones. VA: Natural regeneration is preferred but artificial regen is more common. When planting occurs native species from local nurseries are used.
6.3.f. Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include: a) large live trees, live trees with decay or declining health, ***snags***, and well-distributed coarse down and dead woody material. ***Legacy trees*** where present are not harvested; and b) vertical and horizontal complexity. Trees selected for ***retention*** are generally representative of the dominant species found on the site.	C	Structural diversity is maintained by retaining trees with wildlife habitat features, such as large limbed trees. Legacy trees, as defined by the FSC, are not harvested.
6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when ***even-aged systems*** are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.	C	All even aged harvest openings are within requirements of the standard. CA: Even aged openings are limited to group selections no larger than 1 acre.

In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.		VA: no clearcut larger than 40 acres, 30 acres is more common maximum size. ME: no current plans for harvesting
6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan: 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the ***best available information*** including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.	NA	TCF is not pursuing this option.
6.3.h. The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control ***invasive species***, including: 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.	C	CA: Dedicated invasive species management plans are developed as part of the IRMPs. Invasive species management is done primarily through herbicide use, focused on areas where invasives can be contained. Invasive species of concern include French broom and Pampas grass. VA: field foresters trained in invasive species ID. When located, a management prescription is developed for control, usually manual or chemical control. Common species of concern are mile-a-minute, stiltgrass, phragmites, and Japanese knotweed. ME: invasive species are only a limited concern. Presence/absence is checked during annual monitoring visits.
6.3.i. In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.	C	CA & ME: Most of the TCF land has a low risk of wildfire due to wet conditions. VA: fire risk is highest after fuel buildup from commercial thinning operations. Prescribed burning and other fuel management techniques are used. Staff are trained in fire management to assist local firefighting agency if necessary.
C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	C	
6.9.a. The use of ***exotic species*** is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native	C	No intentional use of exotic species occurs.

biodiversity.		
6.9.b. If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.	NA	
6.9.cThe forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species	NA	
P8 Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.		
C8.1. The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.	C	
8.1.a. Consistent with the scale and intensity of management, the forest owner or manager develops and consistently implements a regular, comprehensive, and replicable written monitoring protocol.	C	All monitoring occurs following regular written protocols, as confirmed through an examination of procedures and records.
8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.	C	
8.2.a.1. For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.	C	CA: Specific inventory plots set up as part of carbon assessment. (Reviewed Inventory Collection Manual). Data collected on species, volumes, general stand composition, regeneration, brush species, snags and down material, timber quality. Post-harvest cruises are done of every area they have harvested. Inventory is updated at that time for the harvested areas. Long term monitoring of forest composition – inventory would be updated once every 10 years on average. Option A is the primary harvest planning document, it will be updated with every new inventory, required to be done every 10 years. Option A permit requires that they show harvesting is done in compliance with the sustainable harvest calculations approved in it. Have not decided if they want to do a CFI system yet. Have not yet made it to 10 years on any of the properties (2006 purchase of big river) Permanent plots on some forests, re-measured every 10 years for forest growth. Going to install permanent plots on buckeye. As part of carbon verification, the transition from CAR to ARB has much stricter system on cruising (switched to fixed radius plots vs variable radius to reduce cruiser error). Goal is to have a single

		inventory for carbon and timber. VA: shape files all have inventory in their GIS system. Do a regular post thinning inventory, have volume per acre for all stands. Are on a plan for a 5 year rolling inventory, started two years. They are on an area management system – 25-30k tons per year. Remsoft includes a growth and yield model. Standard inventory (5 year cycle) 1 plot for every 5 acres. After then thin something they will cruise it. Audit team reviewed field plots for Vastime, Larson, and Scarborough. ME: inventory conducted in 2012 prior to sale of property, next inventory would be planned for 10 years. (287 plots over 12k acres). Audit team reviewed timber cruise spec sheet that covers these required topics.
8.2.a.2. Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.	C	CA: Unanticipated removal is accounted for. After a recent 700 acre fire the area was re-inventoried. They have enough presence on the ground to identify any significant losses if they occur. VA: Historically there was pine beetle, but not recently. The area is overdue for a SPB outbreak. They survey after storms for loss. ME: no examples on the property, possible examples in maine would be spruce budworm or windthrow, blowdown, etc. Forestry staff (Kenny Ferguson) has worked on the forest operations side for forest health working group. There are pheromone sites as part of a larger state wide study to track budworm. Big outbreak in Canada coming into NB. Monitoring of SBW has been done primarily by the Maine Forest Service, CFRU (Cooperative forestry research unit).
8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.	C	CA: review of harvest history, provided in a running tally since 2007. Example, review of salmon creek growth/year in option A. review of annual harvest summary shows harvest is far below growth. NTFP – carbon offset program has copious records. Firewood harvesting restricted to downed material in closed out logging jobs (usually what's on the landing). VA: Reviewed Owens sales trip tickets and Justice tract operation. Tickets included required information. Pulplogs go to Gladfelter or Pocomoke, also small mills on the eastern shore, all do specialty timbers.

		ME: no plans for timber sales anytime soon based on the available timber inventory.
8.2.c. The forest owner or manager periodically obtains data needed to monitor presence on the FMU of: 1) Rare, threatened and endangered species and/or their ***habitats***; 2) Common and rare plant communities and/or habitat; 3) Location, presence and abundance of invasive species; 4) Condition of protected areas, set-asides and buffer zones; 5) High Conservation Value Forests (see Criterion 9.4).	C	CA: Monitoring of RTE species occurs prior to harvest when they have been identified on state databases, i.e. owl calling when NSO are present. Botanical surveys occur with THPs as part of planning process. HCVF areas receive specific monitoring in some cases, such as EMAP monitoring of salmonid watercourses. Botanists do annual surveys related to locations of rare plant communities, Santa Cruz clover. Monterey clover, white rein orchid, They do annual monitoring with the hope to demonstrate that these species are not as fragile as perceived and they would be able to get increased operational ability near these areas. Audit team reviewed annual survey provided by Heise and Hulse-Stephens. Have protected control areas and areas where they operate (approved by FWS) Spotted owl, survey all properties every year, gives them greater flexibility for logging and other CEQA analysis required projects. Tracking the same number of owls, although there is a decline in fledglings.(decrease in activity centers was due to redefining their numbers to only include sites on their properties). Invasive species management plan are required in THP if they are extensively present throughout THP. Botanical surveys done during plan creation survey for invasive. Garcia river has ecological reserve area with designation to turn into late seral. Monitoring of this is done by TNC. HCVF monitoring recorded as part of annual review VA: Heritage data shows the rare plant communities and animal species. Occasionally special review areas are identified where forestry staff is provided with operational advice, but won't be told what the protected resource is. They will just get advice and a response if the operational plan would harm the rare species. Heritage groups will send out scientists to do surveys in this cases as needed. Forestry staff maintains a shape file for invasives, which is added to when new instances are discovered. Invasive species manual. Protected areas – anything with a natural stream. Have some hardwood buffers on drainages.

		No HCVF monitoring has occurred since the HCVF analysis was conducted but determination was no HCVF (no justifications for the criteria or consultation on the analysis, see CAR 2014.4) ME: survey done by Janet McMahon (East Grand Watershed Initiative Preliminary Ecological Assessment), external biologist, did survey in preparation for Legacy forest application fund.
8.2.d.1. Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.	C	Post-harvest review occurs by the forester administering the sales. VA: timber sale administration notes, review of active sales. ME: no active or planned sales.
8.2.d.2. A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.	C	CA: Have a road inventory of all forests (Gualala completed but not compiled), all road projects need 1600 permit and general discharge waiver. THPs have mandatory 3 year monitoring requirement. Security patrol people driving around the forest also check for road system conditions. Have grant funded roadwork assessments. Monitoring after first big rain or large rain events. Constant monitoring and concerted effort after first big roads. VA: hunt clubs are their eyes and ears on road systems. Hunt clubs are required to maintain their old road system. ME: road system is checked on routine basis. Reported on during annual monitoring report, all road issues are rated 1-3 on priority system, analyzed for funding needs.
8.2.d.3. The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e).	C	CA: The TCF maintains a log of their outreach and communication with the larger community. Definitely TCF is seen as providing excellent job opportunities for members of the community, both established and up-and-coming contractors. TCF keeps track of local economic impact, project local economic contribution. One of the main goals is to maintain local timber economy. VA: Forestry staff are quite knowledgable of socio-economic impact of harvesting. a recent study conducted that included economic impact data that could serve as a baseline, but there does not appear to be a regular protocol for socio-economic monitoring. (**OBS 2014.2).** ME: TCF is very involved in local community issues. Recreational use of the property is high with snowmobile and hunting access. TCF held community forums when they acquired the property,

		identified schools, health center, and local agriculture as focus areas. Sought grant applications based on the connection to the East Grand watershed. Funding for these various programs came in part through new markets tax credits, providing funding for low income communities. This funding mechanism requires monitoring of community benefits and socioeconomic impact. Most recent monitoring report was reviewed by the audit team. TCF works with local schools to offer gps training and adventure recreation opportunities. There plans to create a youth guide program. Provided funding for a financial audit of the local health center, which was identified as a need. Participating in conducting community health needs assessment. Local agriculture – aim to assist growing of local vegetables in fallow fields for the summer market. The communities of Orient and Weston are 300 winter residents, grows to 3k in the summer for camps, with a heavy demand for local food.
8.2.d.4. Stakeholder responses to management activities are monitored and recorded as necessary.	C	CA: TCF maintains a log of their outreach and communication with the larger public, 2014 log report was reviewed. For non-CA properties, TCF keeps a WFF complaint request log, noting complaints that have been registered, follow up contact person, etc. no complaints since previous year. VA: talk to lots of adjoining landowners about hunt clubs. Do get hunting reports – annual report from the club describing what they took, ME: Tom is point person as local TCF rep. gets comments from guiding community, have open relationships with landowner/stakeholder groups. Particularly interested representatives of the local guiding community. Comments include requests for boat access.
8.2.d.5. Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3).	C	CA: arch surveys are conducted with each THP, have found some lithic scatters, but no significant sites. VA: no arch sites are present, no tribes are headquartered on the Eastern Shore where the forest is located. ME: TCF has been in touch managers of the Maliseet trail, an historic canoe route that runs through the property in part. Number of individual sites that have been marked. Engaged with tribal historian (Donald Soctoma) of a local tribe, engaged with tribe on St. Croix national waterway commission. Have provided

		Ed Bassett (represents natural resources division of tribal confederation) with maps and GPS points of cultural sites for monitoring.
8.2.e. The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.	C	All costs and revenues are tracked as part of normal business operations. Reviewed Profit & Loss statements for each property. ME property has no revenue since no harvesting has occurred on the property since acquisition.
C8.3. Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."	C	
8.3.a. When forest products are being sold as FSC-certified, the forest owner or manager has a system that prevents mixing of FSC-certified and non-certified forest products prior to the point of sale, with accompanying documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	TCF's control system includes labeling trip tickets with the FSC claim and code, which accompany log loads to their destination.
8.3.b The forest owner or manager maintains documentation to enable the tracing of the harvested material from each harvested product from its origin to the point of sale.	C	TCF has a documented control system covering its stump to gate chain of custody. Trip tickets and sales documentation from recent sales was reviewed.
C8.4. The results of monitoring shall be incorporated into the implementation and revision of the management plan.	C	
8.4.a. The forest owner or manager monitors and documents the degree to which the objectives stated in the management plan are being fulfilled, as well as significant deviations from the plan.	C	Degree to which objectives have been met are considered in the annual management review.
8.4.b. Where monitoring indicates that management objectives and guidelines, including those necessary for conformance with this Standard, are not being met or if changing conditions indicate that a change in management strategy is necessary, the management plan, operational plans, and/or other plan implementation measures are revised to ensure the objectives and guidelines will be met. If monitoring shows that the management objectives and guidelines themselves are not sufficient to ensure conformance with this Standard, then the objectives and guidelines are modified.	C	Revisions to management plans demonstrate how TCF is using its monitoring efforts to adjust its management. Examples include adjusting inventory projections in response to unexpected loss, and adjusting silviculture prescriptions based on past results.
C8.5. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.	C	
8.5.a. While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.	C	TCF is very open about monitoring results for some FMUs. A summary is produced (the Caspar Index) is included in their annual reports, and made available online and to interested stakeholders. However, a public summary of monitoring results is not available for all FMUs in the scope of the certificate. An annual summary of monitoring efforts and results for the California properties is published as part of an annual report, but no corresponding summary exists for other the other properties. CAR 2014.3 was issued.
C9.1. Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.	C	
9.1.a. The forest owner or manager identifies and maps the	C	TCF conducted an HCVF analysis based on their

presence of High Conservation Value Forests (HCVF) within the FMU and, to the extent that data are available, adjacent to their FMU, in a manner consistent with the assessment process, definitions, data sources, and other guidance described in Appendix F. Given the relative rarity of old growth forests in the contiguous United States, these areas are normally designated as HCVF, and all old growth must be managed in conformance with Indicator 6.3.a.3 and requirements for legacy trees in Indicator 6.3.f.		firsthand knowledge of the forest and relying on external conservation planning efforts. 4 forest features were identified for California: a) Oak woodlands and grasslands b) Pygmy cypress forest c) Old growth coniferous forest d) Salmonid spawning streams. All features are described and mapped in the management plans and policy digest. VA: An HCVF checklist was completed for the Eastern Shore Forests as an appendix to the management plan. The checklist indicated that no HCVF was present, but did not provide any justification for this determination. It was also unclear whether this determination underwent consultation with outside experts or stakeholders in order to confirm its accuracy. CAR 2014.4 was issued. ME: HCVF analysis was completed relying on the McMahon report and state heritage databases. Unique features are contained and protected as conservation zones, but it was determined that these do not rise to the level of HCVF.
9.1.b. In developing the assessment, the forest owner or manager consults with qualified specialists, independent experts, and local community members who may have knowledge of areas that meet the definition of HCVs.	C	See above.
9.1.c. A summary of the assessment results and management strategies (see Criterion 9.3) is included in the management plan summary that is made available to the public.	C	Assessment results are made public on TCF website.
C9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.	C	
9.4.a. The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.	C	TCF has some specific monitoring programs associated with HCVF features, such as EMAP aquatic monitoring on class 1 streams. However, HCVF monitoring must occur on an annual basis. TCF's policy digests indicates this requirement will be met through an annual evaluation that will occur as part of the January Program Review as to whether the HCVF features are being sufficiently protected and if there are any new threats to consider. However, minutes from this meeting did not include HCVF as a topic, and therefore there is no objective evidence that HCVF monitoring is occurring annually. CAR 2012.2 was issued. This is a minor CAR since TCF does have annual monitoring of some aspects of its HCVF system, it is just not complete. 2014 update: annual management review meetings were reviewed, which now include a summary of HCVF monitoring.
9.4.b. When monitoring results indicate increasing risk to a	C	No observed threats have occurred in relation to

specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.		TCF's HCVF areas so far.

APPENDICES		
APPENDIX C: REGIONAL LIMITS AND OTHER GUIDELINES ON OPENING SIZES This Appendix contains regional Indicators and guidance pertinent to maximum opening sizes and other guidelines for determining size openings and retention. These Indicators are requirements based on FSC-US regional delineations **Indicator 6.3.g.1**		
PACIFIC COAST REGION	**C**	
Indicator 6.3.g.1.a: Within harvest openings larger than 6 acres, 10-30% of pre-harvest basal area is retained. The levels of green-tree retention depend on such factors as: opening size, legacy trees, adjacent riparian zones, slope stability, upslope management, presence of critical refugia, and extent and intensity of harvesting across the FMU. Retention is distributed as clumps and dispersed individuals, appropriate to site conditions. Retained trees comprise a diversity of species and size classes, which includes large and old trees. Regeneration harvest blocks in even-aged stands average 40 acres or less. No individual block is larger than 60 acres.	NA	No harvest openings of this size occur. Largest gaps are limited to 1 acre as part of group selections.
Indicator 6.3.g.1.b Even-aged silviculture may be employed where: 1) native species require openings for regeneration or vigorous young-stand development, or 2) it restores the native species composition, or 3) it is needed to restore structural diversity in a landscape lacking openings while maintaining connectivity of older intact forests. ***Guidance**: In some dry regions, retaining approximately 10 tons of debris per acre may be sufficient. In wetter regions, retaining 20 tons of debris per acre may be sufficient. Debris is well distributed spatially and by size and decay class, with a goal of at least 4 large pieces (approximately 20" diameter x 15' length) per acre. Three to 10 snags per acre (averaged over 10 acres) are maintained or recruited. Snags are well represented by size, species, and decay class.*	NA	Even aged siliviculture is not used in TCF's pacific region forests.
Indicator 6.3.g.1.c Where necessary to protect against wind throw and to maintain microclimate, green trees and other vegetation are retained around snags, down woody debris, and other retention components.	NA	Snags are protected. TCF's limited group openings are unlikely to result in windthrow effects.
Indicator 6.3.g.1.d Native hardwoods and understory vegetation are retained as needed to maintain and/or restore the natural mix of species and forest structure.	NA	TCF protects and encourages the presence of native hardwoods for wildlife purposes. Evidence includes a targeted approach to pesticide use that maintains most competing hardwood species.
Indicator 6.3.g.1.e If regeneration harvest ages do not approach ***culmination of mean annual increment*** (CMAI), retention approaches the upper end of the range required in Indicator 6.3.h.1.a (above).	NA	
Indicator 6.3.g.1.f No logical logging unit adjacent to a logged even-aged regeneration unit may be harvested using an even-aged regeneration method unless/until the prior even-aged regeneration unit is adequately stocked by a stand of trees in which the dominant and co-dominant trees average at least five feet tall and three years of age from the time of establishment on the site, either by planting or by natural regeneration. If the requirement to achieve adequate stocking is to be met with trees that were present at the time of harvest, there shall be a period not less than five years following the completion of operations before an adjacent even-aged regeneration harvest may occur.	NA	

APPENDIX E: STREAMSIDE MANAGEMENT ZONE (SMZ) REGIONAL REQUIREMENTS **Indicator 6.5.e** This Appendix addresses regionally explicit requirements for Indicator 6.5.e and includes SMZ widths and activity limits within those SMZs for the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions. The forest owner or manager will be evaluated based on the sub-indicators within their specific region, below.		
PACIFIC COAST REGION *PC Applicability note: The following water quality requirements of this Standard are superceded when and where state or federal laws, regulations, or other contractual requirements are more stringent.* *PC Guidance: This section uses the following definitions:* ***Category A stream:** A stream that supports or can support populations of native fish and/or provides a domestic water supply.* ***Category B stream:** Perennial streams that do not support native fish and are not used as a domestic water supply.* ***Category C stream:** An intermittent stream that never the less has sufficient water to host populations of non-fish aquatic species* ***Category D stream:** A stream that flows only after rainstorms or melting snow and does not support populations of aquatic species*		
6.5.e.1.a (PC only) For Category A streams, and for lakes and wetlands larger than one acre, an inner buffer zone is maintained. The inner buffer is at least 50 feet wide (slope distance) from the active high water mark (on both sides) of the stream channel and increases depending on forest type, slope stability, steepness, and terrain. Management activities in the inner buffer: maintains or restore the native vegetation are limited to single-tree selection silviculture retain and allows for recruitment of large live and dead trees for shade and stream structure retain canopy cover and shading sufficient to moderate fluctuations in water temperature, to provide habitat for the full complement of aquatic and terrestrial species native to the site, and maintain or restore riparian functions exclude use of heavy equipment, except to cross streams at designated places, or where the use of such equipment is the lowest impact alternative avoid disturbance of mineral soil; where disturbance is unavoidable, mulch and seed are applied before the rainy season avoid the spread of pathogens and noxious weeds avoid road construction and reconstruction.	C	TCF has a 50 foot no harvest buffer on Class 1 watercourses (equivalent to Category A)
6.5.e.1.b (PC only) For Category A streams, and for lakes and wetlands larger than one acre, an outer buffer zone is maintained. This buffer extends from the outer edge of the inner buffer zone to a distance of at least 150 feet from the edge of the active high water mark (slope distance, on both sides) of the stream channel. In this outer buffer, harvest occurs only where: single-tree or group selection silviculture is used post harvest canopy cover maintains shading sufficient to moderate fluctuations in water temperature, provide habitat for the full complement of aquatic and terrestrial species native to the site, and maintain or restore riparian functions new road construction is avoided and reconstruction enhances riparian functions and reduces sedimentation; disturbance of mineral soil is avoided; where disturbance is unavoidable, mulch and seed are applied before the rainy season	C	TCF's general management practices are limited to single tree or group selection, meaning this indicator is met by default for harvests within the outer buffer zone (where only single-tree selection occurs currently).
6.5.e.1.c (PC only) For Category B streams, a 25-foot (slope distance) inner buffer is created and managed according to provisions for inner buffers for Category A. A 75-foot (slope distance) outer buffer (for a total buffer of 100 feet) is created and managed according to provisions for outer buffer for Category A.	C	Interior buffer is within a no harvest area, outer buffer falls within a single tree selection.

6.5.e.1.d (PC only) For Category C streams, and for lakes and wetlands smaller than one acre, a buffer zone 75 feet wide (on both sides of the stream) is established that constrains management activities to those that are allowed in outer buffer zones of Category A streams.	C	Buffer requirements met through use of single tree selection.
6.5.e.1.e (PC only) For Category D streams, management: maintains root strength and stream bank and channel stability recruits coarse wood to the stream system minimizes management-related sediment transport to the stream system. Streams, vernal pools, lakes, wetlands, seeps, springs, and associated riparian areas are managed to maintain and/or restore hydrologic processes, water quality, and habitat characteristics (see NMFS (1996); state water quality standards; Karr (1981) which may include: the capacity for water to infiltrate the soil; habitat for riparian species; moderating water temperature; controlling sedimentation; clean gravel for spawning; physical structures to protect the integrity of the stream channel; including pools used by anadromous fish. Forest owners or managers retain and recruit sufficient large, green trees; snags; understory vegetation; down logs; and other woody debris in riparian zones to provide shade, erosion control, and in-channel structures.	C	Buffer requirements met through use of single tree selection.
Southeast Region 6.5.e.1 (SE only) Streamside or special management zones (SMZs) are specifically described and/or referenced in the management plan, included in a map of the forest management area, and designed to protect and/or restore water quality and aquatic and riparian populations and their habitats (includingriver and stream corridors, steep slopes, fragile soils, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas). At a minimum, management of SMZs has the following characteristics: Management meets or exceeds state BMPs. SMZ width reflects changes in forest condition, stream width, slope, erodibility of soil, and potential hazard from windthrow along the length of the watercourse. SMZs provide sufficient vegetation and canopy cover to filter sediment, limit nutrient inputs and chemical pollution, moderate fluctuations in water temperature, stabilize stream banks, and provide habitat for riparian and aquatic flora and fauna. Characteristic diameter-class distributions, species composition, and structures are adequately maintained within the SMZs.	C	Specific stream side requirements are contained in the management plans.

Appendix 6 – Chain of Custody Indicators for FMEs

Version 5-1: 12/03/12

REQUIREMENT	C/ NC	COMMENT/CAR

1. Quality Management		
1.1 The organization shall appoint a management representative as having overall responsibility and authority for the organization's compliance with all applicable requirements of this standard.	C	TCF has appointed such a management representative in its procedures. (COC Administrator is Scott Kelly (707) 272-4497; author of procedures is Trevor Cutsinger at (919) 951-0107)
1.2 The FME shall maintain complete records of all FSC-related COC activities, including sales and training, for at least 5 years.	C	Stated in TCF's COC procedures (THE CONSERVATION FUND – NEW FOREST FUND, Certified Product Chain of Custody Procedure, November 15, 2013).
1.3 The FME shall define its forest gate(s) (check all that apply): *The forest gate is defined as the point where the change in ownership of the certified-forest product occurs.*	C	[X] **Stump** *Stumpage sale or sales of standing timber; transfer of ownership of certified-forest product occurs upon harvest.* [ ] **On-site concentration yard** *Transfer of ownership of certified-product occurs at concentration yard under control of FME.* [X] **Off-site Mill/Log Yard** *Transfer of ownership occurs when certified-product is unloaded at purchaser's facility.* [ ] **Auction house/ Brokerage** *Transfer of ownership occurs at a government-run or private auction house/ brokerage.* [X] **Lump-sum sale/ Per Unit/ Pre-Paid Agreement** *A timber sale in which the buyer and seller agree on a total price for marked standing trees or for trees within a defined area before the wood is removed — the timber is usually paid for before harvesting begins. Similar to a per-unit sale.* [ ] **Log landing** *Transfer of ownership of certified-product occurs at landing/yarding areas.* [ ] **Other** *(Please describe):*
1.4 The FME shall have sufficient control over its forest gate(s) to ensure that there is no risk of mixing of FSC-certified forest products covered by the scope of the FM/COC certificate with forest products from outside of the scope prior to the transfer of ownership.	C	TCF has described any risks of mixing in its procedures, as well as measures employed to avoid mixing of certified material with non-certified material up to the point of sale. TCF does not purchase forest products from other properties.
1.5 The FME and its contractors shall not process FSC-certified material prior to transfer of ownership at the forest gate without conforming to applicable chain of custody requirements. *NOTE: This does not apply to log cutting or de-barking units, small portable sawmills or on-site processing of chips/biomass originating from the FMU under evaluation.*	C	TCF does not process material prior to the transfer of ownership.
2. Product Control, Sales and Delivery		

2.1. Products from the certified forest area shall be identifiable as certified at the forest gate(s).	C	TCF's procedures include measures for ensuring that certified products are identifiable via invoices and field marking.
2.2 The FME shall maintain records of quantities/volumes of FSC-certified product(s).	C	TCF's procedures describe measures for maintaining records and volumes for FSC and financial auditing.
2.3. The FME shall ensure that all sales documents issued for outputs sold with FSC claims include the following information: a) name and contact details of the organization; b) name and address of the customer; c) date when the document was issued; d) description of the product; e) quantity of the products sold; f) the organization's FSC Forest Management (FM/COC) or FSC Controlled Wood (CW/FM) code; g) clear indication of the FSC claim for each product item or the total products as follows: i. the claim "FSC 100%" for products from FSC 100% product groups; ii. the claim "FSC Controlled Wood" for products from FSC Controlled Wood product groups. h) If separate transport documents are issued, information sufficient to link the sales document and related transport documentation to each other.	C	TCF's sample trip ticket includes all of this information. In certain cases, this information is communicated in the timber sale contract and it is the purchaser's trip tickets that must accompany the log loads.
2.4 The FME shall include the same information as required in 2.3 in the related delivery documentation, if the sales document (or copy of it) is not included with the shipment of the product. **Note: 2.3 and 2.4 above are based on FSC-STD-40-004 V2-1 Clause 6.1.1 and 6.1.2**	C	Trip tickets accompany all timber sales and include the same information as 2.3.

2.5 When the FME has demonstrated it is not able to include the required FSC claim as specified above in 2.3 and 2.4 in sales and delivery documents due to space constraints, through an exception, SCS can approve the required information to be provided through supplementary evidence (e.g. supplementary letters, a link to the own company's webpage with verifiable product information). This practice is only acceptable when SCS is satisfied that the supplementary method proposed by the FME complies with the following criteria: a) There is no risk that the customer will misinterpret which products are or are not FSC certified in the document; b) The sales and delivery documents contain visible and understandable information so that the customer is aware that the full FSC claim is provided through supplementary evidence; c) In cases where the sales and delivery documents contain multiple products with different FSC Claims, a clear identification for each product shall be included to cross-reference it with the associated FSC claim provided in the supplementary evidence. *FSC-ADVICE-40-004-05*	NA	Trip tickets include the information in 2.4.
3. Labeling and Promotion		☐ **n/a**
3.1 Describe where/how the organization uses the SCS and FSC trademarks for promotion.	C	The "tick mark and tree" logo is not used, but registered trademarks including the words "Forest Stewardship Council" are used in public documents.
3.2 The FME shall request authorization from SCS to use the FSC on-product labels and/or FSC trademarks for promotional use.	NC	Examples of the use of Forest Stewardship Council trademarks were observed without the required registered trademark symbol. CAR 2014.1 was issued.
3.3 Records of SCS and/or FSC trademark use authorizations shall be made available upon request.	C	
4. Outsourcing		☒ **n/a**
4.1 The FME shall provide the names and contact details of all outsourced service providers.		Outsourced activities include logging and transport, which are considered low-risk activities under COC rules.

4.2 The FME shall have a control system for the outsourced process which ensures that: a) The material used for the production of FSC-certified material is traceable and not mixed with any other material prior to the point of transfer of legal ownership; b) The outsourcer keeps records of FSC-certified material covered under the outsourcing agreement; c) The FME issues the final invoice for the processed or produced FSC-certified material following outsourcing; d) The outsourcer only uses FSC trademarks on products covered by the scope of the outsourcing agreement and not for promotional use.		
5. Training and/or Communication Strategies		
5.1 All relevant FME staff and outsourcers shall be trained in the FME's COC control system commensurate with the scale and intensity of operations and shall demonstrate competence in implementing the FME's COC control system.	C	TCF's procedures address training of staff and/or applicable contractors, including frequency of training.
5.2 The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings, the intended frequency of COC training (i.e. training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks, etc).	C	TCF's COC procedures are the primary method of communication. Trainings will be tracked via a database and will include a list of trained staff and contractors.

Appendix 7 – Group Management Program Members

Note, this certificate is classified as a multiple fmu since a single forest management entity (The Conservation Fund) manages the entire certificate. However, the FMUs are listed here for reference.

Name	**Phone number**	**Email**	**Location & Coordinates**	**Total forest area**	**Area by type Management** (Private/State/ Community)	**Main Products**	**Year(s) evaluated**
Large FMUs (>10,000 ha)							
Medium FMUs (>1,000 – 10,000 ha)							
Garcia River Forest				24,000 ac	Private	Logs	2007-2012
Gualala Forest				14,000 ac	Private	Logs	2012, 2014

Salmon Creek Forest				8,000 ac	Private	Logs	2007-2012, 2014
Big River Forest				8,000 ac	Private	Logs	2007-2012
Buckeye				18,120 ac	Private	Logs	2014
Penfield Forest				2,041 ac	Private	Pulpwood/Logs	
Chesapeake Forest (SCI)				8,600 ac	Private	Pulpwood/Logs	2014
Success Pond				8,900 ac	Private	Pulpwood/Logs	2013
Bobcat Ridge				7,051 ac	Private	Pulpwood/Logs	2013
McConnell Pond				4,500 ac	Private	Pulpwood	(also included in another FSC group certificate)
East Grand Lake				5,947 ac	Private	Pulpwood/Logs	2014
SLIMF FMUs (100 – 1,000 ha)							
SLIMF FMUs (<100 ha)							

Name	**Phone number**	**Email**	**Location & Coordinates**	**Total forest area**	**Area by type Management** (Private/State/ Community)	**Main Products**	**Year(s) evaluated**
Medium FMUs (>1,000 – 10,000 ha)							
Garcia River Forest				24,000 ac	Private	Logs	2007-2012
Gualala Forest				14,000 ac	Private	Logs	2012
Salmon Creek Forest				8,000 ac	Private	Logs	2007-2012
Big River Forest				8,000 ac	Private	Logs	2007-2012
Penfield Forest				2,041 ac	Private	Pulpwood/Logs	

Chesapeake Forest (SCI)				8,600 ac	Private	Pulpwood/Logs	
Success Pond				8,900 ac	Private	Pulpwood/Logs	2013
Bobcat Ridge				7,051 ac	Private	Pulpwood/Logs	2013
McConnell Pond				4,500 ac	Private	Pulpwood	2012 (separate certificate)
East Grand Lake				5,947 ac	Private	Pulpwood/Logs	
SLIMF FMUs (100 – 1,000 ha)							
SLIMF FMUs (<100 ha)							