

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

The Conservation Fund
Working Forest Fund and Related Properties
California, New York, and Maine

SCS-FM/COC-00102N

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CERTIFIED	EXPIRATION
21 December 2017	20 December 2022

DATE OF FIELD EVALUATION
24-25 September and 1-2 October 2019
DATE OF REPORT FINALIZATION
13 January 2020

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Foreword

Cycle in annual surveillance evaluations				
<input type="checkbox"/> 1 st annual evaluation	<input checked="" type="checkbox"/> 2 nd annual evaluation	<input type="checkbox"/> 3 rd annual evaluation	<input type="checkbox"/> 4 th annual evaluation	<input type="checkbox"/> Other (expansion of scope, Major CAR audit, special audit, etc.):
Name of Forest Management Enterprise (FME) and abbreviation used in this report:				
TCF				

All certificates issued by SCS under the aegis of the Forest Stewardship Council (FSC) require annual evaluations 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 evaluations are not intended to comprehensively examine the full scope of the certified forest operations, as the cost of a full-scope evaluation would be prohibitive and it is not mandated by FSC evaluation protocols. Rather, annual evaluations 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 evaluation);
- Follow-up inquiry into any issues that may have arisen since the award of certification or prior to this evaluation; 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 evaluation.

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 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 evaluation. Section B contains more detailed results and information for required FSC record-keeping or the use by the FME.

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Evaluation Team

Auditor name:	Stefan A. Bergmann	Auditor role:	Lead Auditor
Qualifications:	Mr. Bergmann has been in the forestry and wood products field for nearly 20 years, working across the US on forest policy, landowner extension, and forest certification. He also has senior staff executive experience with two forestry non-profits in the Midwest. Prior to joining SCS in 2017, he worked for Rainforest Alliance, overseeing the Forest Stewardship Council® (FSC®) Forest Management auditing program in the US. He has successfully completed FSC Forest Management Lead Auditor training, ISO 9001 Lead Auditor training, and is qualified to be an SFI team auditor. He has served as lead and team auditors on numerous FSC FM audits around the country. He holds a BS in Wildlife Science and an MS in Forest Resources, both from Oregon State University, and recently completed an MBA at the University of California Davis.		
Auditor name:	Tucker Watts	Auditor role:	Team Member
Qualifications:	Mr. Watts is a partner in Watts Consulting LLC. His primary focus is forest certification through auditing. Since 2008, Watts has been involved with SFI Forest Management, Fiber Sourcing, Certified Sourcing, and Chain of Custody auditing, FSC Forest Management and Chain of Custody auditing, Programme for the Endorsement of Forest Certification Chain of Custody auditing, auditing of the American Tree Farm System’s Group certification, auditing of the Responsible Procurement Program of the National Wood Flooring Association and auditing of the Sustainable Biomass Partnership. Watts has 30-year experience in forest management with a large forest products corporation involved in the manufacturing of paper, lumber and plywood. For 10 years, Watts was a system manager for the forest certification system.		

1.2 Total Time Spent on Evaluation

A. Number of days spent on-site for evaluation:	4
B. Number of auditors participating in on-site evaluation:	2
C. Number of days spent by any technical experts (in addition to amount in line A):	0
D. Additional days spent on preparation, stakeholder consultation, and follow-up:	3
E. Total number of person days used in evaluation:	11

1.3 Standards Used

All standards used are available on the websites of FSC International (www.fsc.org) or SCS Global Services (www.SCSglobalServices.com). All standards are available on request from SCS Global Services via the comment form on our website. When no national standard exists for the country/region, SCS Interim Standards are developed by modifying SCS’s Generic Interim Standard to reflect forest management in the region and by incorporating relevant components of any Draft Regional/National Standard and comments from stakeholders. More than one month prior to the start of the field evaluation, SCS Draft Interim Standards are provided to stakeholders identified by FSC International, SCS, forest managers under evaluation, and the FSC National or Regional Office for comment. SCS’s COC indicators for FMEs are based on the most current versions of

the FSC Chain of Custody Standard, FSC Standard for Group Entities in Forest Management Groups (FSC-STD-30-005), and FSC Accreditation Requirements.

Standards applicable <i>NOTE: Please include the full standard name and Version number and check all that apply.</i>	<input checked="" type="checkbox"/> Forest Stewardship Standard(s), including version: FSC-US Forest Management Standard (v1.0, 8 July 2010)
	<input checked="" type="checkbox"/> FSC Trademark Standard (FSC-STD-50-001 V2-0)
	<input checked="" type="checkbox"/> SCS COC indicators for FMEs, V7-0
	<input type="checkbox"/> FSC standard for group entities in forest management groups (FSC-STD-30-005), V1-1
	<input type="checkbox"/> Other:

2. Certification Evaluation Process

2.1 Evaluation Itinerary, Activities, and Site Notes

Date: Tuesday, 24 September 2019 (California properties)	
Auditors: Stefan Bergmann and Tucker Watts	
FMU/location/ sites visited	Activities/ notes
Opening meeting: California properties, Ukiah Field Office	<p>Introductions, scope of evaluation, evaluation methods, confidentiality and public summary, emergency and security procedures, client update, review of open CARs/OBS, and site selection.</p> <p><i>Topics discussed:</i> Current active operations on the California FMUs; invasive species management; road repairs from winter storms; timber cruising methodology; fisheries restoration grants and participation in coho broodstock program to repopulating Garcia River; participation in Redwood Tree Improvement Program to establish seedlings for planting as part of climate adaptation; pre-harvest public tours; public firewood program; permit system for non-motorized recreation (bicycling, horseback riding, fishing, etc.); building fire resilience practices into management in response to climate change, including burning slash piles, mulching slash near roads, and Redwood Tree Improvement Program; tanoak management includes testing treatment systems—in Fish Rock THP using cut only, hack-and-squirt plus cut, and cut and treat stumps; each stand is re-inventoried every 10 years as part of the Continuous Forest Inventory program; use FORSEE to model growth and yield; FME operates under Option A approved by the state; GIS database attribute layers; in the last 10 years, all culverts that have failed during the winters have been resized for 100-year floods; and required monitoring for yellow-legged frog, a candidate species.</p>
Site 1: West Hazel THP, active operation, Salmon Creek FMU	Property lines have been blazed, signed, and flagged for the operation. Signage along road designate it as an active logging area with authorized personnel only allowed. THP prescription is single

<p>Site 1 (Cont.)</p>	<p>tree selection to continue to move the stands to uneven age. The THP includes an older (30-40 years) clearcut that had been planted followed by PCT. THP includes NSO activity center, which restricts logging within the activity center to after July 9 to minimize the impact of equipment noise on nesting NSO. Class 1 and 2 streams in THP marked with appropriate buffers. Option A allows up to 30% of volume to be removed. Goal is to leave or create 4 wildlife trees per acre on average (wildlife trees observed). Verified presence of firebox, water can, spill kits, First-aid kits, and fire extinguishers. Crew member bucking logs on landing wearing appropriate chainsaw PPE (chaps, hard hat, eye protection, ear protection, etc.). The operation involved fallers, skidder, yarder, and loader. Crew members interviewed. Verified that the operator is ProLogger Certified; the crew is knowledgeable about the harvest prescription and appears to be well-trained. The operation is about to finish up the Cat-logging unit and then will move to the yarder unit; the audit team observed the crew finalizing the setup for the yarder. Little residual damage observed. Slash used to stabilize slopes and fragile areas. A number of straw bales were piled in preparation for stabilizing crossings and roadsides. Market destinations are designated by the FME, with three sorts for redwood and one for Douglas-fir. Some refuse was scattered about the landing. Reviewed completed trip ticket (#10626), which contained the appropriate FSC claim and certificate code.</p>
<p>Travel to Site 2</p>	<p>Very large legacy tree, which had been tagged by the former landowner as a wildlife tree, was observed. Discussion about invasives and pests facing the FMUs: Scotch broom, French broom, pampas grass, and Sudden Oak Death.</p>
<p>Site 2: Fish Rock West THP, Gualala FMU</p>	<p>Completed in 2018. Log landing at top of ridge near a gated entrance road. Landing area clean and stabilized. Roads crowned. Waterbars and slash used to stabilize skid trails. The THP contains 1-acre group openings; following the harvest, tanoak was treated in the openings with hack-and-squirt, Douglas-fir and redwood were planted in the winter, and dead tanoak was fallen in the spring. The group openings were used to generate volume, and to convert stands back to conifer-dominated ones. A written herbicide plan was developed by an independent consultant; chemicals applied by a state-licensed pesticides applicator (audit team reviewed license). Applicator purchases, handles, applies, and disposes of chemicals and containers. Selected tanoak trees were retained for wildlife. Planting occurred at 12'x12' spacing using redwood planting stock grown from seeds collected from TCF property in a similar elevation; Douglas-fir was sourced from Jackson State Demonstration Forest. Planting was monitored during planting operation. Seedling survival will be checked at 2-years following planting; the goal is to reach 90% survival (state minimum is 70%). A sample of groups examined by the audit team demonstrated adherence to the harvest plan, with LWD from the</p>

Site 2 (Cont.)	fallen tanoak prevalent. There was discussion about the protocol for ribbon use; FME personnel acknowledged that the combination of colors use onsite was not consistent with the protocol.
Date: Wednesday, 24 September 2019 (California properties, cont.)	
Auditors: Stefan Bergmann and Tucker Watts	
FMU / location / sites visited	Activities / notes
Site 3: Kelly Road	Shared access with adjacent property owner. Road crowned and well maintained. Road is gated and follows Buckeye Creek. Road is used to access the Buckeye FMU.
Site 4: Road slide, Buckeye FMU	Large slide along Stanley Ridge Road, though with minimal sedimentation reaching Franchini Creek. There was discussion about how the road system on the FMU hasn't been a priority, as the FME is only just now beginning to conduct active harvests in the area (see Site 6).
Site 5: Franchini Creek Sediment Reduction Project, Buckeye FMU	Near-stream 271 Road decommissioned during Fall 2018; project funded by CDFW grant. Its 1-mile length was slash mulched and contains large waterbars. Banks hayed for stabilization. Cut bank failure along stream occurred 3 years ago; as part of the sediment reduction project, a 4-ft berm at an old Creekside landing was removed, leaving a step bank. Hillside stabilized with hay, and audit team witnessed notes for follow-up monitoring. A road crossing of a side stream was constructed of a metal culvert with a Humboldt culvert on top; there is minor washing around the structure, but the area is stable and will be monitored and repaired as needed. Due to heavy rain, a culvert blew out. Area repaired and upgraded with grant. Old culvert will be stockpiled and removed when several are accumulated. Culvert installation stabilized with hay and riprap. Evidence of unauthorized ATV use in the area, including a trail that crossed Buckeye Creek, an anadromous stream. No sedimentation observed at the crossing, as the site is mostly sand and rock.
Travel to Site 6	Emergency preparedness was discussed. Roads are monitored following the first major winter rain event, and during each major storm thereafter. Notes are taken on map with findings and prescription for restoration. Emergency repairs and plugged culverts are addressed.
Site 6: Grasshopper THP, Buckeye FMU	271-acre THP; plan is still being developed. Plan comprised of 210 acres single tree selection and 61 acres transitional silviculture to move from even or regular structure to uneven age. One-acre groups will be cut in areas dominated by tanoak. WLPZ buffer along Soda Springs Creek; contains a rare grass plant. No old growth, legacy trees, or NSOs are in the THP. THP will be 70% cable logged and 30% tractor logged. Archeological sites on the THP are limited to lithic scatter and an old mill site, which have been flagged. In the selection area, pine will be left, with 1/3 of basal area removed. In the thinned area, all trees will be marked to cut. In the selection area, sugar pine will not be removed (waiting for

<p>Site 6 (Cont.)</p>	<p>export market to open up). Last entry was a thinning that occurred in 1999, but this is the First THP in the Buckeye FMU since TCF took ownership.</p> <p>THP includes a stand that was planted 30 years ago and PCT completed in 2019. Species in stand include redwood, Douglas-fir, and madrone. Ridgetop stand, dry site. The prescription was to cut 10-in diameter trees and smaller. Three acres had been marked by the forester and used for training purposes for the PCT crew. There are about 30 acres in this condition in the THP, and 100s of acres of this type on the FMU that are not growing to their full potential. Madrone and bay laurel in the THP will only be cut if unsafe, as the trees are important for wildlife. The target is to leave 4 wildlife trees/acre (2 from the largest size class and 2 from another size class). The THP is designed to restore the stands from the previous landowner’s “inspectors cut,” meaning that those cuts had been be lighter around roads and heavier farther away.</p>
<p>Site 7: Roadside invasive species control, Buckeye FMU</p>	<p>Scotch and French broom identified during normal management activities. Treatment areas documented in GIS. Areas combined in an annual contract. Goal is to contain, not eradicate. Contractor is responsible for purchasing, handling, application, and disposal of chemical and containers. Only a state-licensed applicator is used. Backpack sprayer used. PE and safety discussed. Dye is mixed with chemical for monitoring application. Monitoring is conducted 30 days after application. Signage to make public aware of the spraying was observed. Recommended chemical treatment is provided by a consultant. The applicator has been asked to give to TCF personnel the same training that he does for his own staff; the training has not occurred yet but is in the works.</p>
<p>Site 8: Soda Springs Creek, Buckeye FMU</p>	<p>In an established WLPZ, TCF staff have identified erosion along Soda Springs Creek, a Class 2 and 3 stream. A narrow gully was caused by an old skid trail that had diverted the stream from its natural watercourse. As part of the THP, the stream will be redirected to its original channel; TCF consulted a geologist, who recommended this approach. An old road will be opened up and then following the harvest 1,500 feet will be decommissioned.</p>
<p>Travel to closing meeting</p>	<p><i>Discussion topics:</i> Each FMU has its own budget and operating procedures; CDFW now recognizes non-coho projects for funding, which may open up opportunities for addressing steelhead and other fisheries improvement projects; priority for road projects on Buckeye FMU; and status of road assessment for FMU.</p>
<p>Closing Meeting: California properties, Soda Springs Reserve</p>	<p>Review preliminary findings (potential non-conformities and observations) for California properties. Discuss next steps,</p>

Date: Tuesday, 1 October 2019 (Pennsylvania properties)	
Auditor: Tucker Watts	
FMU / location / sites visited	Activities / notes
Opening meeting: Pennsylvania properties, FME Field Office	Introductions, scope of evaluation, evaluation methods, confidentiality and public summary, emergency and security procedures, client update, review of open CARs/OBS, and site selection.
Site 9: Powerline Cherry Timber Sale, Clarion Junction FMU	Selective Thinning. "Men Working" sign for road and hunting. Erosion and Sediment Control Plan Template posted on entrance to sale. Logger had completed state logger training. Witnessed and discussed Timber Sale Agreement, Notification of Harvest, Erosion and Sediment Control Plan, Contractor Correspondence and Contract Provisions, Pre-Harvest Conference Form, Timber Sale Administration Inspection Form, and Final Inspection and Holdback Release Form. Sensitive area for dragonfly and eagle mapped and documented. Deck clear and stabilized with seed and hay. Existing skid trails and crossing used. Skid trails stabilized with waterbars and slash. Waterbars marked with flagging. Existing crossings stabilized with rock and riprap around culverts. Erosion pillows, seed, and hay for additional stabilization of area. Ephemeral stream has 40' SMZ and is flagged; no equipment allowed in buffer. Wildlife trees marked with "W" if alive. Dead trees left for wildlife if do not pose a safety issue. Aesthetics zone along roads and landings.
Site 10: Happy Days Timber Sale, active operation, Clarion Junction FMU	117-acre overstory removal. Beech released. Create early successional stand for habitat diversity for wildlife. Tops will protect regeneration from deer browse. Residuals protected during harvesting. Erosion and Sediment Control Plan Template posted on entrance to sale. Logger completed state logger training. Witnessed and discussed Timber Sale Agreement, Notification of Harvest, Erosion and Sediment Control Plan, Contractor Correspondence and Contract Provisions, Pre-Harvest Conference Form, Timber Sale Administration Inspection Form, and Final Inspection and Holdback Release Form. Sensitive area for dragonfly and eagle mapped and documented. Eagle zone on property. After flooding in area, culvert repair was necessary. Will replace with bridge. General Permit is required for bridge installation. Bridge will be reviewed by state. Plan is in place for reworking culverts.
Site 11: Feather Pillow Timber Sale, active operation, Clarion Junction FMU	Selective marked. Erosion and Sediment Control Plan Template posted on entrance to sale. Notice of sale given to adjacent landowner. Logger completed state logger training. Witnessed and discussed Timber Sale Agreement, Notification of Harvest, Erosion and Sediment Control Plan, Contractor Correspondence and Contract Provisions, Pre-Harvest Conference Form, Timber Sale Administration Inspection Form, and Final Inspection and Holdback Release Form. During heavy rains, issue developed with berm on road diverting sediment to creek which is in city water supply.

Site 11 (Cont.)	Culverts and rolling dips upgraded to control water. Water supply identified in GIS. Buffers marked along creek. Temporary waterbars established due to rain. No crossings.
Site 12: No Hole Too Deep Timber Sale, Clarion Junction FMU	54-acre herbicide treatment. Witnessed Professional Services Agreement. Ground herbicide treatment for buckthorn to release maple and cherry. Contractor licensed. Prescription developed in conjunction with applicator. Visual observation of stand identified chemical release necessary. Contractor will purchase, handle, apply, and dispose of chemical and containers. Shape files and map provided to applicator. Field Service Provider is on site when contractor begins application. MSDS onsite.
Date: Wednesday, 2 October 2019 (Pennsylvania properties, cont.)	
Auditor: Tucker Watts	
FMU/location/ sites visited	Activities/ notes
Site 13: Bark Camp Run Tract, Penfield FMU	133-acre shelterwood. Discussed Pennsylvania Fish and Wildlife Habitat Plan developed with NWTF and NRCS; Conservation Plan developed with NRCS; search of Pennsylvania Natural Diversity Index; Timber Sale Contract; Contractor Correspondence & Contract Provisions; and sales monitoring. Logger has completed state logger training. Cut-offs remain onsite for wildlife habitat. Deck is clean. Debris scattered for stabilization. Visible regeneration observed onsite.
Site 14: East Mountain Run Tract, Penfield FMU	50-acre chemical application. Discussed Pennsylvania Fish and Wildlife Habitat Plan developed with NWTF and NRCS; Conservation Plan developed with NRCS. Ground application to control fern and birch. Witnessed Professional Services Agreement. Contractor will purchase, handle, apply, and dispose of chemical and containers. Map provided to applicator.
Site 15: Sandy Lick Creek Tract, Penfield FMU	18, 20, 10, 70-acre overstory removals. Creation of habitat for golden wing warbler. Discussed Pennsylvania Fish and Wildlife Habitat Plan developed with NWTF and Pheasants Forever. Spotty regeneration from deer browse. This is good habitat for warbler. Witnessed Timber Sale Agreement. State logger training has been completed.
Site 16: Hoyt Run Tract, Penfield FMU	30 and 21-acre overstory removals. Creation of habitat for golden-winged warbler. Discussed Pennsylvania Fish and Wildlife Habitat Plan developed with NWTF and Pheasants Forever. Spotty regeneration from deer browse. This is good habitat for warbler. Witnessed Timber Sale Contract. State logger training has been completed. SMZ flagged. Wider SMZ has been implemented in steep areas (no equipment allowed in buffers). Waterbars are established daily during the wet season. Deck has been shaped, seeded, and mulched. Waterbars, dips, and wing ditches have been seeded, mulched, and armored with hay bales. Tops and debris used for protection of regeneration from browse. Existing crossings used and closed by shaping, seeding, and mulch. Slash

Site 16 (Cont.)	used to protect landing from ATV traffic. Some skid trails could use additional waterbars. Mulch will be added to trails.
Closing meeting: Pennsylvania properties, FME Office	Review preliminary findings (potential non-conformities and observations) for Pennsylvania properties. Discuss next steps

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 reviewing documents and records, interviewing FME personnel and contractors, implementing sampling strategies to visit a broad number of forest cover and harvest prescription types, observing implementation of management plans and policies in the field, and collecting and analyzing stakeholder input. When there is more than one team member, each member may review parts of the standards based on 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, interviews, stakeholder comments, and reviewed documents and records. Where consensus among team members cannot be achieved due to lack of evidence, conflicting evidence or differences of interpretation of the standards, the team is instructed to report these in the certification decision section and/or in observations.

3. Changes in Management Practices

- There were no significant changes in the management and/or harvesting methods that affect the FME's conformance to the FSC standards and policies.
- Significant changes occurred since the last evaluation that may affect the FME's conformance to FSC standards and policies (*describe*):

4. Results of Evaluation

4.1 Definitions of Major CARs, Minor CARs and Observations

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

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

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

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

4.2 History of Findings for Certificate Period

FM Principle	Cert/Re-cert Evaluation 2017	1 st Annual Evaluation 2018	2 nd Annual Evaluation 2019	3 rd Annual Evaluation 2020	4 th Annual Evaluation 2021
No findings	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
P1					
P2					
P3	OBS 2017.6 (3.3.a)				
P4					
P5	OBS 2017.1 (5.3.b)				
P6	OBS 2017.2 (6.5.d); Minor CAR 2017.3 (6.4.d); OBS 2017.1 (6.5.d)		OBS 2019.1 (6.6.a); OBS 2019.2 (6.5.d)		
P7					
P8					
P9					
P10					
COC for FM	Minor CAR 2017.5 (3.1, 3.2, and 3.3)				
Trademark	Minor CAR 2017.5 (1.15 and 1.16)	Major CAR 2018.1 (1.15)			
Group	NA				
Other	NA				

4.3 Existing Corrective Action Requests and Observations

Finding Number: 2018.1	
Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
FMU CAR/OBS issued to (when more than one FMU): North Coast (California)	
Deadline	<input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify): none
FSC Indicator:	FSC Trademark Standard (FSC-STD-50-001), Indicators 1.15

Non-Conformity (or Background/ Justification in the case of Observations): On the website for the Working Forest Fund (https://www.conservationfund.org/our-work/working-forest-fund/certification), the acronym “FSC” is missing a trademark symbol.	
Corrective Action Request (or Observation): The use of the trademark symbol ® (in superscript font) must accompany the first use of “FSC” and “Forest Stewardship Council” in any text (Indicator 1.15). This is an upgrading of a finding from 2017, which was partially addressed by FME.	
FME response (including any evidence submitted)	The website has been updated to include the use of the trademark symbol. https://www.conservationfund.org/our-work/working-forest-fund/certification
SCS review	Auditors reviewed updated website on 3 January 2018 prior to completion of draft report. The website demonstrated compliance to the FSC trademark standard.
Status of CAR:	<input checked="" type="checkbox"/> Closed during 2018 audit <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

4.4 New Corrective Action Requests and Observations

Finding Number: 2019.1	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to: Big River FMU	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US Forest Management Standard (v1.0), Indicator 6.6.a
Non-Conformity (or Background/ Justification in the case of Observations): The Big River FMU has an easement with a utility company that allows the easement holder to control vegetation in the utility right-of-way; FME management and staff stated that pesticides are applied by the utility company in the right-of-way. The holder of an easement for a pipeline right-of-way may also be using chemicals. The audit team clarified via interviews with FME personnel that the FME has not requested pesticide use from or placed pesticide use restrictions on the utility company nor any other parties holding easements with use rights. <u>SCS is actively seeking an interpretation from FSC on the reporting requirements for chemicals that may be used by such easement holders.</u>	
Corrective Action Request (or Observation): To ensure that no products on the FSC list of Highly Hazardous Pesticides are used on the certified property, the FME should collect information on the use of pesticides by the utility company, or excise these sites from the FMU.	
FME response (including any evidence submitted)	
SCS review	

Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>
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Finding Number: 2019.2	
Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
FMU CAR/OBS issued to: Buckeye FMU	
Deadline	<input type="checkbox"/> Pre-condition to certification/recertification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> 12 months or next regularly scheduled audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Observation – response is optional <input type="checkbox"/> Other deadline (specify):
FSC Indicator:	FSC-US Forest Management Standard (v1.0), Indicator 6.5.d
Non-Conformity <i>(or Background/ Justification in the case of Observations):</i> Several roads on the Buckeye FMU were observed with rilling, rutting, and slides. A road assessment has been started for the FMU, but there is no timeline for completion. The audit team recognizes that the FME is only just now beginning to conduct timber management activities on the Buckeye FMU; these activities may serve as opportunities to upgrade and improve such roads. The FME would benefit from clarifying the priority and plan for addressing roads on the FMU.	
Corrective Action Request <i>(or Observation):</i> Indicator 6.5.d requires that the FME’s transportation system be designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, including minimizing soil erosion and sediment discharge to streams. The FME is presently in conformance, but in order to ensure continued conformance the FME should expedite completion of the road assessment for the Buckeye FMU and develop a road improvement plan for the FMU based on this assessment. The plan should include a prioritization of road improvement activities, approximate timeline, and potential funding sources. The FME is encouraged to explore grants to fund road improvement projects that fall outside of THPs.	
FME response <i>(including any evidence submitted)</i>	
SCS review	
Status of CAR:	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>

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 FME and the surrounding communities.
- To solicit input on whether the forest management operation has consulted with stakeholders regarding identifying any high conservation value forests (HCVFs).

Stakeholder consultation activities are organized to give participants the opportunity to provide comments according to general categories of interest based on the three FSC chambers, as well as the SCS Interim Standard, if one was used.

5.1 Stakeholder Groups Consulted

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

5.2 Summary of Stakeholder Comments and Evaluation Team Responses

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.

<input type="checkbox"/> <i>FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual evaluation.</i>	
Stakeholder Comment	SCS Response
<p>“They always reach out to the community for input on their plans...I believe as time has gone by during their ownership, the community has been less engaged (probably because they do not see a threat), but I think the Fund keeps trying to engage people.</p>	<p>This comment provides evidence of conformance for Indicator 4.4.a, which requires that the forest owner or manager understands the likely social impacts of management activities and incorporates this understanding into management planning and operations. Fulfillment of this requirement involves interacting with and seeking the input of local communities.</p>
<p>“They have an active stakeholder program designed to bring the interested public in a few times a year to share the azalea bloom and other events and have engaged stakeholders in invasive plant removal. I think they have worked hard to</p>	

<p>maintain good relationships with local community members and local operators.”</p>	
<p>“[The] Conservation Fund abides by Mendocino Measure V. A legally approved ordinance.”</p>	<p>This is evidence of conformance for Indicator 1.1.a, which requires that forest management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and administrative requirements</p>
<p>One stakeholder expressed concern over the level of cuts occurring in stands with low stocking. This person stated that the FME does not “assure inventory increases in a relatively short period of time, 20 to 40, years—when such increases are sorely needed to improve forest health, productivity, and carbon inputs that are needed to fight climate change...The Conservation Fund...[is] cutting less than growth—usually taking about 30% of the volume on ground that has stocking close to or above 200 sq. ft/acre—while thinning to allow for release of dominant trees...What I am pointing out is the proposed cuts are not heavy—but, given the stocking levels the watersheds, will take a very long time to recover. Now is not the time to be waiting on this.”</p>	<p>TCF utilizes inventory data to model sustainable growth levels into the future. The Option A document approved by CAL FIRE includes the sustainability calculations for Garcia River, Gualala, and Big River and Salmon Creek properties. Option A under California Forest Practice Rules requires accurate inventory data and growth and harvest projection over the next 100-year planning period. This information is produced by a growth and yield model with inventory and management inputs and is reviewed by CAL FIRE as part of the approval process. The annual harvests from the four parcels on the North Coast are below the AAC calculated in the Option A document.</p> <p>TCF maintains a thorough inventory system with permanent plots on the North Coast, driven in part by its need to calculate carbon storage. The FME also closely monitors regeneration and stocking levels on harvested units to ensure that stocking goals are met.</p>
<p>TCF “do[es] pretty well on their road and erosion management.”</p>	<p>This comment is consistent with the audit team’s field observations, which showed conformance to Indicator 5.3.b. That indicator requires that harvest practices are managed to protect residual trees and other forest resources, including minimizing erosion.</p>
<p>“I found them to be willing stewards of the natural resources, concerned and willing to take action in the vital areas of invasive plant infestations and rare species protection within the forest habitats. They have supported</p>	<p>The audit team saw examples of both invasive plant control and protection of rare plant species during the 2019 audit. This comment and the observations of the audit team provide evidence of conformance for Indicators 6.1 and 6.3.h.</p>

<p>monitoring of rare species over a significant time period to determine if practices were compatible with the preservation of rare plants and of course avoided rare plants while giving an adequate buffer from forest operations.”</p>	
<p>“They are exemplary community members and actively encourage the engagement of local people in their forestry work with well-publicized tours of their projects in Northern California. I have participated in numerous such tours and found their discussions honest and thorough and that they welcome all questions. The Conservation Fund has also been extraordinarily helpful to the new non-profit Redwood Forestry group. We are impressed by their professional work and community-minded approach to their important work.”</p>	<p>TCF actively invites input from community members, such as through pre-harvest public tours. Such tours and field tours serve as evidence of conformance for Indicator 4.1.f, which requires that the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management.</p>
<p>“TCF is doing a great job in their forest management...In the past I have participated in numerous field trips with community members...Their community outreach efforts should be commended and used as a template for other landowners seeking the FSC.”</p>	
<p>“These people are really great to work with. Very knowledgeable in their fields and are not afraid to pass that knowledge onto others that do not know. I have worked with them for several years and have always enjoyed being with them.”</p>	<p>Duly noted.</p>

6. Certification Decision

<p>The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual evaluation team recommends that the certificate be sustained, subject to subsequent annual evaluations and the FME’s response to any open CARs.</p>	<p>Yes <input checked="" type="checkbox"/> No <input type="checkbox"/></p>
<p>Comments: TCF is an exceptional, mission-driven forestry organization that actively supports working forests and a triple bottom line approach to conservation and community development. The organization’s forest management is aligned with the goals of the FSC standard.</p>	

7. Annual Data Update

<p><input type="checkbox"/> No changes since previous evaluation.</p>
<p><input type="checkbox"/> Information in the following sections has changed since previous evaluation.</p>

<input type="checkbox"/> Name and Contact Information <input type="checkbox"/> FSC Sales Information <input checked="" type="checkbox"/> Scope of Certificate <input type="checkbox"/> Non-SLIMF FMUs <input type="checkbox"/> Social Information	<input type="checkbox"/> Pesticide and Other Chemical Use <input type="checkbox"/> Production Forests <input type="checkbox"/> FSC Product Classification <input type="checkbox"/> Conservation & High Conservation Value Areas <input type="checkbox"/> Areas Outside of the Scope of Certification
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Name and Contact Information

Organization name	The Conservation Fund		
Contact person	Holly Newberger		
Address	14951 "A" Caspar Rd, Box 50 Caspar, CA 95420 United States	Telephone	(707) 962-0712
		Fax	866-426-4496
		e-mail	hnewberger@conservationfund.org
		Website	https://www.conservationfund.org/

FSC Sales Information

<input checked="" type="checkbox"/> <i>FSC Sales contact information same as above.</i>			
FSC salesperson	-		
Address	-	Telephone	-
		Fax	-
		e-mail	-
		Website	-

Scope of Certificate

Certificate Type	<input type="checkbox"/> Single FMU	<input checked="" type="checkbox"/> Multiple FMU
	<input type="checkbox"/> Group	
SLIMF (if applicable)	<input checked="" type="checkbox"/> Small SLIMF certificate (Penfield Forest FMU is a small SLIMF)	<input type="checkbox"/> Low intensity SLIMF certificate
	<input type="checkbox"/> Group SLIMF certificate	
# Group Members (if applicable)	-	
Number of FMUs in scope of certificate	11	
Geographic location of non-SLIMF FMU(s)	Big River - 123.63717 39.32173 Salmon Creek - 123.666 39.20859 Garcia River - 123.49593 38.91987 Gualala - 123.40512 38.82044 Buckeye - 123.31216 38.74257 McConnell Pond - 71.80094 44.81636 Success Pond - 71.06279 44.58235 Reed Planation - 68.09859 45.70349 East Grand Lake - 67.83608 45.73598 Cranberry Lake - 74.83265 44.25727	

		<i>Clarion Junction - 41°29'26.22"N 78°40'30.09"W</i>	
Forest zone	<input type="checkbox"/> Boreal	<input checked="" type="checkbox"/> Temperate	
	<input type="checkbox"/> Subtropical	<input type="checkbox"/> Tropical	
Total forest area in scope of certificate which is:		Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac	
privately managed	154,364		
state managed	-		
community managed	-		
Number of FMUs in scope that are:			
less than 100 ha in area	-	100 - 1000 ha in area	1
1000 - 10 000 ha in area	8	more than 10 000 ha in area	2
Total forest area in scope of certificate which is included in FMUs that:		Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac	
are less than 100 ha in area		-	
are between 100 ha and 1000 ha in area		2,041	
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs		-	
Division of FMUs into manageable units:			
Divided among the following 11 properties.			
<u>California</u>			
Garcia River Forest – 24,000 acres			
Gualala Forest – 14,000 acres			
Big River and Salmon Creek – 16,000 acres			
Buckeye Forest – 18,120 acre			
<u>Vermont</u>			
McConnell Pond – 4,665 acres			
<u>Maine</u>			
East Grand Lake – 4,544 acres			
Reed Plantation – 32,431 acres			
<u>Pennsylvania</u>			
Penfield Forest – 2,041 acres			
Clarion Junction – 32,598 acres			
<u>New Hampshire</u>			
Success Pond – 8,900 acres			
<u>New York</u>			
Cranberry Lake – 8,162 acres			

Non-SLIMF FMUs (Group or Multiple FMU Certificates)

Name	Contact information*	Latitude/ longitude of Non-SLIMF FMUs
See section on <i>Geographic location of non-SLIMF FMU(s)</i> above under the <i>Scope of Certificate</i> .	-	See section on <i>Geographic location of non-SLIMF FMU(s)</i> above under the <i>Scope of Certificate</i> .

* Contact information excluded from report to protect confidentiality. FME may provide this information upon request.

Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
Male workers: 84	Female workers: 11	
Number of accidents in forest work since previous evaluation:	Serious: 0	Fatal: 0

Pesticide and Other Chemical Use

<input type="checkbox"/> FME does not use pesticides.				
Commercial name of pesticide / herbicide	Active ingredient	Quantity applied since previous evaluation (kg or lbs.)	Total area treated since previous evaluation (ha or ac)	Reason for use
-	Glyphosate	9.8 lbs	157 acres	Hack and Squirt tanoak management
Rodeo	Glyphosate	2.31 fluid Oz	Multiple spots single stems/small patches	Japanese Knotweed along Grasse River. Trying to eradicate and prevent spread
Accord XRT-II	Glyphosate	0.6 fluid oz.	10 sq. ft. – small patch	Japanese Knotweed
Rodeo	Glyphosate	5.4 fluid oz.	Less than 1 acre	Common Reed Grass – Phragmites

Production Forests

Timber Forest Products	Units: <input type="checkbox"/> ha or <input type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	147,947

Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	0
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	147,947
Silvicultural system(s)	Area under type of management
Even-aged management	0
Clearcut (clearcut size range: NA)	-
Shelterwood	-
Other:	-
Uneven-aged management	147,947
Individual tree selection	-
Group selection	-
Other:	-
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	-
Non-timber Forest Products (NTFPs)	
Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services	0
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	-
Species in scope of joint FM/COC certificate: (Scientific / Latin Name and Common / Trade Name)	
<i>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</i>	

FSC Product Classification

Timber products		
Product Level 1	Product Level 2	Species
W1 Rough Wood*	W1.1 Roudwood (logs)	All (see species list above)
	W1.2 Fuel Wood	
	W1.3 Twigs	
W3 Wood in chips or particles	W3.1 Wood chips	<i>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,</i>

		<i>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, Betula lenta, Nyssa sylvatica, Robinia pseudoacacia, Juglans cinerea, Picea pungens, Juglans nigra, Magnolia accuminata, Ulmus Americana., Picea spp., Prunus spp., Pinus spp., Sassafras albidum, and Acer spp.</i>
Non-Timber Forest Products		
Product Level 1	Product Level 2	Product Level 3 and Species
NA	NA	NA

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

Conservation and High Conservation Value Areas

Conservation Area	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total amount of land in certified area protected from commercial harvesting of timber and managed primarily for conservation objectives (includes both forested and non-forested lands).*	6,417

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

High Conservation Value Forest / Areas			Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Code	HCV Type	Description & Location	Area
HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	North Coast, CA FMUs:	2,737
		Northern Spotted Owl habitat	283
		Reed Plantation FMU: Wood Turtle, Creeper, and Brook Floater	435
		Clarion Junction FMU: Catherine Swamp buffer	

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 ecosystems.	North Coast, CA; Oak woodlands and grasslands.	1,195
HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	North Coast, CA FMUs: Class I streams Success Pond FMU: Forested wetlands Clarion Junction FMU: Erosion control areas	3,066 106 84
HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).	-	-
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'			7,906

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

<input type="checkbox"/> N/A – All forestland owned or managed by the applicant is included in the scope.		
<input checked="" type="checkbox"/> Applicant owns and/or manages other FMUs not under evaluation.		
<input type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification. Note: Excision cannot be applied to CW/FM certificates.		
Explanation for exclusion of FMUs and/or excision:	The Conservation Fund is a national organization, with land holdings throughout the US. Some of the organization's properties are FSC-certified, some SFI-certified, and some are dual FSC- and SFI-certified. The certified lands are the properties that support timber harvesting. TCF's other forested properties are either not managed for timber or are planned to be sold in the near future.	
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 (<input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac)

4 State Forest	VT, NH	21,916
Twin Lakes	Iron County, WI	14,096
Brunswick	Brunswick, NC	3,670
Bly Hollow	NY, VT	22,563
Haynes	Hancock, Washington CO, ME	15,868
Skinner Mountain	Overton and Fentress Co, TN	11,729
Logan	Logan and Mingo, WV	16,229
CFI	Bulloch, Bryan, Jeff Davis, Appling, GA	14,225
Chesapeake Forest	Eastern Shore, VA	8,710
Pleasant River Headwaters	Piscataquis County, ME	26,740
Three Rivers	St Lawrence and Franklin Counties, NY	32,919

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 establish 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 (CA)	non-SLIMF	Natural Forest	Random sample stratified by region
Buckeye (CA)	non-SLIMF	Natural Forest	Random sample stratified by region
Gualala Forest (CA)	non-SLIMF	Natural Forest	Random sample stratified by region
Clarion Junction (PA)	non-SLIMF	Natural Forest	New FMU in certificate
Penfield (PA)	SLIMF	Natural Forest	Only FMU in small (<1k ha) size class; never evaluated

Appendix 2 – Staff and Stakeholders Consulted

List of FME Staff Consulted

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

Name	Title	Contact Information	Consultation method
David Whitehouse	Forest Operations Manager (outgoing), Working Forest Fund	dwhitehouse@conservationfund.org	in person
Brian Schneider	Forest Operations Manager (new), Working Forest Fund	bschneider@conservationfund.org	in person
Scott Kelly	Timberlands Manager	skelly@conservationfund.org	in person
Holly Newberger	North Coast Program Coordinator	hnewberger@conservationfund.org	in person
Olivia Fiori	Forester	ofiori@conservationfund.org	in person
Lynsey Kelly	GIS Specialist	lkelly@conservationfund.org	in person

List of other Stakeholders Consulted*

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

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Darcie Mahoney	Consulting Forester	dmahoney@mcn.org	Email	No
Alan Levine	-	alevine@mcn.org	Email	Yes
Geri Hulse-Stephens	Consulting Botanist	gerihs79@gmail.com	Email	Yes
Judy Tarbell	Community Member	Tarbell@mcn.org	Email	Yes
Mike Stephens	Consultant	strix@mcn.org	Email	Yes
Don Miller	Woods Security	millerdlit@hotmail.com	Email	Yes
Michael Hovatter	Pennsylvania Regional Forester, Landvest	mhovatter@landvest.com	In person	Yes
Steven Hawkes	Managing Director Eastern Operations, Landvest	shawkes@landvest.com	In person	No
Dave Gustafson	Chief of Forestry, Pennsylvania Game Commission	dgustafson@pa.gov	In person	Yes
Kate Whehler	Elk Conservation District	kwehler@countyofelkpa.com	In person	Yes

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

Appendix 3 – Additional Evaluation Techniques Employed

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

Appendix 4 – Required Tracking

Pesticide Derogations

- There are no active pesticide derogations for this FME.

Progressive HCVF Assessments

- FME does not use partial or progressive HCVF assessments.

Note: In the case the FME is not operating in the entire management unit, it is permissible to only complete an HCVF assessment for the portion of the unit in which they are operating under special

conditions. In such cases, the HCVF assessment must be extended if new areas are entered without an existing, appropriate HCVF assessment having been completed. An example includes a large forest concession where harvesting is initially limited to a smaller geographic scope.

Special Instructions or Scoping Notes for Next Regularly Scheduled Annual Audit

<input type="checkbox"/>	Not applicable; no significant issues identified that may impact the next audit.
Some issues were identified during this audit that the next audit team could consider in the next audit, such as:	
<input type="checkbox"/>	Scope of certificate:
<input type="checkbox"/>	Audit sampling:
<input type="checkbox"/>	Audit time:
<input type="checkbox"/>	Audit season:
<input type="checkbox"/>	Travel time between sites or FMUs:
<input type="checkbox"/>	Audit frequency:
<input type="checkbox"/>	Suggested audit team competency for next audit:
<input type="checkbox"/>	Suggested requirements to include during the next audit:
<input checked="" type="checkbox"/>	<p>Suggested issues investigate during the next audit: Unauthorized use of ATVs.</p> <p><i>Background:</i> Public use of the FMUs is limited to permitted activities including hiking and fishing. Some activities, including the use of ATVs, are disallowed. During the 2019 audit, on the Buckeye FMU there was evidence of ATV use along several roads and trails, including an ATV crossing of an anadromous stream (Site 5). The FMP for the Buckeye FMU states that unauthorized activities, but acknowledges that is an ongoing problem. Additionally, a logger at West Hazel THP (Salmon Creek FMU) stated that mountain bikes had been observed during an active operation (Site 1) the morning of the FSC audit visit, although signage had been posted warning of the operation. Finally, there was evidence that unauthorized use of ATVs was also an issue on the Pennsylvania FMUs evaluated in 2019 (Site 16).</p>
<input type="checkbox"/>	Suggested sites for inspection:
<input type="checkbox"/>	Stakeholders to be consulted:
<input type="checkbox"/>	Other(s) – please describe:

Appendix 5 – Forest Management Standard Conformance Table

<p>Criteria required by FSC at every surveillance evaluation (<i>check all situations that apply</i>)</p>	<p><input type="checkbox"/> NA – all FMUs are exempt from these requirements.</p> <p><input type="checkbox"/> Plantations > 10,000 ha (24,710 ac): 2.3, 4.2, 4.4, 6.7, 6.9, 10.6, 10.7, and 10.8</p> <p><input checked="" type="checkbox"/> Natural forests > 50,000 ha (123,553 ac) ('low intensity' SLIMFs exempt): 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 8.2, and 9.4</p> <p><input checked="" type="checkbox"/> FMUs containing High Conservation Values ('small forest' SLIMFs exempt): 6.2, 6.3, 6.9 and 9.4</p>
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Documents and records reviewed for FMUs/sites sampled	<input checked="" type="checkbox"/> All applicable documents and records as required in the audit plan were reviewed; or <input type="checkbox"/> The following documents and records as required in the audit plan were NOT reviewed (<i>provide explanation</i>):
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Requirements Reviewed in Annual Evaluation

Evaluation Year	Requirements Reviewed (FSC P&C Reviewed, FM/COC Indicators, Trademark Indicators, Group Standard Indicators, etc.)
2017	All – (Re)certification Evaluation
2018	FM Principles 2 and 3; FM Indicators 1.5, 4.2, 4.4, 5.3, 5.6, 6.2, 6.3, 6.4, 6.5, 6.9, 8.2, and 9.4; and Trademark Standard.
2019	FM Principles 1, 5, and 6; FM Indicators 2.3, 3.2, 4.2, 4.4, 8.2, and 9.4; and FSC Trademark Standard
2020	-
2021	-

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

REQUIREMENT	C/NC	COMMENT/CAR
Principle #1: Compliance with Laws and FSC Principles		
Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.		
1.1 Forest management shall respect all national and local laws and administrative requirements.	C	-
1.1.a Forest management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and administrative requirements (e.g., regulations). Violations, outstanding complaints or investigations are provided to the Certifying Body (CB) during the annual audit.	C	<p>TCF’s Sustainable Forestry Commitment specifies a commitment to achieving compliance with applicable environmental, forestry and social laws and regulations. TCF has a system in place to ensure that such laws and regulations are implemented and achieved.</p> <p>The system to achieve regulatory compliance includes:</p> <ol style="list-style-type: none"> 1. commitment to achieve continuing regulatory compliance;

	<ol style="list-style-type: none"> 2. contract provisions with landowners and contractors; 3. training of appropriate staff and contractors in applicable regulations; 4. BMP compliance monitoring by TCF and State Agencies; 5. taking corrective and preventive action; and 6. management review and continual improvement. <p>If a regulatory non-compliance issue were to be uncovered by TCF staff, contractor or regulatory agency personnel, TCF is committed to taking prompt corrective action to mitigate any environmental impacts.</p> <p>North Coast Timberlands No violations, complaints or investigations have been received since the last annual audit. Mendocino County has passed a new regulation related to the creation of standing dead trees on private property, with which TCF is complying. The ordinance indicates a level of liability related to future fires and fuel availability. This could impact the application of herbicide using the hack-and- squirt method to tanoaks on the property, although it is not clear that this would constitute a violation. The FME has utilized this method to control tanoak as part of its ecological objectives to increase or maintain conifer stocking levels on the property. The California FPA Rules require that species composition related to Type A species is not decreased through management. Tanoak might be reduced by other more labor-intensive methods, but these are much more costly.</p> <p>Pennsylvania Properties No violations, outstanding complaints, or investigation have been documented by FME</p>
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		<p>or reported by regulatory agencies interviewed, or discovered during the surveillance audit. Inspectors of the County Conservation District and Pennsylvania Game Commission were interviewed for Penfield and Clarion Junction Properties. Operating guidelines and FMPs contain language demonstrating compliance with applicable federal, state, county, municipal, and tribal laws, and administrative requirements.</p>
<p>1.1.b To facilitate legal compliance, the <i>forest owner</i> or <i>manager</i> ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.</p>	<p>C</p>	<p>North Coast Timberlands THPs are designed to facilitate legal compliance. Thus, operating in compliance with the THP ensures legal compliance. Violation would result in citation against THP from CAL FIRE. All contractors are required by contract (samples reviewed by audit team) to operate in compliance with the specifications of the THP. All operators are licensed by the State of California. Standard pre-operation meeting between one of FME’s two RPFs and each contractor is conducted to cover the specifics of the project, including reviewing applicable forestry laws and regulations.</p> <p>Pennsylvania Properties TCF and its third-party forest managers receive information about applicable laws and regulations through professional continuing education and review of publications. Pesticide applicators are informed of applicable laws and regulations during certification training. Logging contractors are informed during state logger certification and other training programs. Road contractors and planting contractors are informed during on-the-job training. State and county agencies are also contacted prior to harvesting and silviculture activities.</p>

		TCF staff have Internet access to regulatory agency websites where they can access the most current versions of relevant laws and regulations. The most relevant websites are listed in the Federal agency homepages or links including the state forestry associations, Federal agencies, and state agencies.
1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.	C	-
1.2.a The forest owner or manager provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.	C	Review of accounts payable documents verifies that taxes have been made in a timely manner. Interviews with staff and stakeholders further support conformance for this indicator.
1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.	C	-
1.3.a. Forest management plans and operations comply with relevant provisions of all applicable binding international agreements.	C	No evidence of non-compliance with international requirements. The FME has a list of applicable treaties, the requirements of which are incorporated into federal law. The FME does not harvest nor sell any products covered under CITES, and labor conventions on the FMU comply with ILO Conventions. The management of the FMUs includes many projects with the objective of maintaining diversity of species and habitats in accordance with the Convention on Biological Diversity.
1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.	C	-

<p>1.4.a. Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, Criteria or Indicators are documented and referred to the CB.</p>	<p>C</p>	<p>No areas of conflicts with compliance to the FSC P&C were found with laws or regulations pertaining to the forest or its management.</p>
<p>1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</p>	<p>C</p>	<p>-</p>
<p>1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the <i>Forest Management Unit</i> (FMU).</p>	<p>C</p>	<p>North Coast Timberlands TCF provides protection from illegal and unauthorized activities on the forest by gating most access roads and keeping the gates locked. They also hire a patrol person to look for illegal access and activities. Some activities, such as hiking, are allowed with a written permit. FME staff and contractors also provide security through their day-to-day activities on the FMUs. In addition, due to the pervasive nature of illegal marijuana plantations in the region, each year (approximately in June) the FME flies the properties to look for marijuana grows. GPS coordinates for any discovered marijuana grows are provided to the sheriff, although the prevalence of the illegal grow sites has been declining in recent years and the frequency of flyovers may be reduced. There also have not been significant water diversions or land clearing related to marijuana grows in recent years.</p> <p>Pennsylvania Properties On Clarion Junction and Penfield FMUs, TCF provides protection from illegal and unauthorized activities on the forest by gating most access avenues and keeping the gates locked. TCF is enrolled in the PA Game Commission Program for public access. Signs are in place. Properties are closed to motorized access.</p>
<p>1.5.b. If illegal or unauthorized activities occur, the forest owner or manager</p>	<p>C</p>	<p>North Coast Timberlands</p>

<p>implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.</p>		<p>The main types of illegal activities include unpermitted access and illegal marijuana growing. Illegal marijuana growing is handled by reporting and cooperating with the appropriate law enforcement. The sheriff won't take action on illegal grows under 200 plants, but it will eradicate the following summer. No instances of timber theft. If timber theft was discovered, then it would be referred to CAL FIRE. Unauthorized trespass is most often avoided by requiring the people to fill out a permit for access.</p> <p>Pennsylvania Properties TCF is enrolled in the PA Game Commission Program for public access. Signs are in place. Properties are closed to motorized access. Witnessed folder for complaints and trespass. When issues are identified, TCF supports the PA Game Commission. There have been no recent issues pertaining to illegal or unauthorized activities on the FMUs.</p>
<p>1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</p>	<p>C</p>	<p>-</p>
<p>1.6.a. The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.</p>	<p>C</p>	<p>Publicly-available commitment can be found in management planning documents available on TCF's website.</p> <p>The following statement appears on TCF's website: "The Conservation Fund recognizes that forest certification is a critical component of objective, sustainable forest management and commits to third-party certification of its working forests. When ownership of our Working Forest Fund (WFF) properties is planned to exceed one year, we will seek independent certification under the standards of Sustainable Forestry Initiative® (SFI) and/or Forest Stewardship Council® (FSC)."</p>
<p>1.6.b. If the certificate holder does not certify their entire holdings, then they</p>	<p>C</p>	<p>The FME does not certify all of its holdings. The Conservation Fund is a national</p>

<p>document, in brief, the reasons for seeking partial certification referencing FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.</p>		<p>organization, with land holdings throughout the US. FME staff and written document explain why some of TCF’s holdings are not certified. In most cases, the organization functions as a short-term owner before transferring the property to a government land management agency or non-profit entity in the form of a conservation easement. TCF’s holdings outside of this certificate are in conformance with the partial estate rules (e.g., no conversion, no use of GMOs, etc.).</p>
<p>1.6.c. The forest owner or manager notifies the Certifying Body of significant changes in ownership and/or significant changes in management planning within 90 days of such change.</p>	<p>C</p>	<p>North Coast Timberlands No changes in ownership and/or changes in management planning for either parcel.</p> <p>Pennsylvania Properties FME notified SCS of the addition of the Clarion Junction FMU.</p>
<p>Principle #2: Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</p>		
<p>2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.</p>	<p>NE</p>	<p>-</p>
<p>2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies. <i>Applicability Note: For the planning and management of publicly owned forests, the local community is defined as all residents and property owners of the relevant jurisdiction.</i></p>	<p>NE</p>	<p>-</p>
<p>2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification</p>	<p>C</p>	<p>-</p>

<p>evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</p>		
<p>2.3.a If <i>disputes</i> arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.</p>	C	<p>No disputes have arisen over tenure rights on any of the FMUs. FME staff explain that if a dispute were to arise, the organization would make a good-faith effort to resolve the issue outside of court through open communication, negotiation, and/or mediation.</p>
<p>2.3.b The forest owner or manager documents any significant disputes over tenure and use rights.</p>	C	<p>Records of disputes are kept on file along with an explanation of the course of action that was implemented to address the issue. Issues have been minor and not over tenure or use rights. Witnessed logs.</p>
<p>Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</p>		
<p>3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.</p>	NE	-
<p>3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</p>	C	-
<p>3.2.a During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.</p>	C	<p>Interview with TCF management confirmed there are no such tribes near any of the WFF properties.</p> <p>North Coast Timberlands A list of Mendocino County Native American contacts is maintained and updated regularly by CAL FIRE. This list is used in the management of the North Coast FMUs. As part of the state-required THP process for private forest management, the FME utilizes the agency’s database to identify tribal representatives to which letters requesting input on planned activities are mailed in order</p>

		<p>to confirm that no harm will come to their resources or rights.</p> <p>Pennsylvania Properties The forest manager has sent letters to communicate with communities of indigenous people in their area to identify sites of current or traditional cultural, archeological, ecological, economic or religious significance. Interview with FCF personnel confirmed there are no such tribes near any of the WFF properties.</p>
<p>3.2.b Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.</p>	<p>C</p>	<p>Interview with TCF management confirmed there are no such tribes near any of the WFF properties.</p> <p>North Coast Timberlands Most rights of Native Americans related to protection of archaeological sites. Per California Forest Practice Rules, these sites must be protected, and their protection must take input from tribes into account. Protection measures for tribal resources are incorporated into the THP prior to approval for all harvests occurring on the North Coast FMUs. Consultation with the appropriate tribal groups is required and the state archeologist reviews protection measures.</p> <p>Pennsylvania Properties The forest manager has sent letters to communicate with communities of indigenous people in their area to identify sites of current or traditional cultural, archeological, ecological, economic or religious significance.</p>
<p>3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.</p>	<p>NE</p>	<p>-</p>

<p>3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.</p>	<p>NA</p>	<p>FME does not manage tribal lands and does not use any protected traditional knowledge.</p>
<p>Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</p>		
<p>4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</p>	<p>NE</p>	<p>-</p>
<p>4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</p>	<p>C</p>	<p>-</p>
<p>4.2.a The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).</p>	<p>C</p>	<p>TCF has a <i>Commitment to Safety and Health</i> document that details its approach to maintaining a safe working environment. Specific company safety policies include: (1) frequent tailgate safety meetings—at least a half hour per month of safety training; (2) wearing personal protective equipment, including at all active harvest sites; (3) reporting all injuries, near-accidents, and hazardous conditions; and (4) holding employees accountable for poor safety performance by re-training and taking disciplinary action.</p> <p>Based on observations and interviews with FME staff and contractors, TCF appears to meet all applicable laws and regulations covering the health and safety of employees and their families. This is also true for contractors hired by TCF. Safety equipment worn as necessary during site visits.</p>
<p>4.2.b The forest owner or manager and their employees and contractors demonstrate a</p>	<p>C</p>	<p>During site visits, TCF’s employees and contractors demonstrate a safe work</p>

<p>safe work environment. Contracts or other written agreements include safety requirements.</p>		<p>environment. Appropriate PPE was utilized by employees and provided to the audit team, logging crews were seen wearing appropriate PPE on active sites, and FME staff were cognizant of the need to wear seat belts and drive safely. Interviews with contractors and review of FME documents indicates that both the FME and its contracted workers have a good safety track record. Contracts require that contractors follow safety guidelines.</p>
<p>4.2.c The forest owner or manager hires well-qualified service providers to safely implement the management plan.</p>	<p>C</p>	<p>Based on interviews with FME staff and observations of in-woods work, the service providers contracted by the FME are well-qualified.</p> <p>North Coast Timberlands All logging in CA is carried out by LTOs, herbicide contractors are licensed PCAs in CA, and botanical and wildlife surveys are carried out by trained professionals. When pesticide application is handled by TCF staff, a forester who is certified as QAL is utilized.</p> <p>Pennsylvania Properties Loggers have completed state logger training program and are current with training. The state logger training program provide safety, endangered species, and BMP training. Chemical contractors have completed state applicator licensing. Witnessed training records for logger and applicators license.</p>
<p>4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).</p>	<p>NE</p>	<p>-</p>
<p>4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both</p>	<p>C</p>	<p>-</p>

<p>men and women) directly affected by management operations.</p>		
<p>4.4.a The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on:</p> <ul style="list-style-type: none"> • Archeological sites and sites of cultural, historical and community significance (on and off the FMU); • Public resources, including air, water and food (hunting, fishing, collecting); • Aesthetics; • Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; • Community economic opportunities; • Other people who may be affected by management operations. <p>A summary is available to the CB.</p>	<p>C</p>	<p>TCF is highly aware of and considers carefully the potential social impacts of its management impacts on the resources and local community.</p> <p>North Coast Timberlands</p> <p>The FME has a local advisory committee actively engaged in planning and review of planned activities. The FME annually publishes and makes available to the public an annual report about the North Coast Forest Conservation Initiative. The latest edition from 2017 was reviewed during the audit. Included in this is the Caspar Index, which includes several environmental, economic, and social metrics demonstrating impact.</p> <p>TCF maintains a list of stakeholders in the local communities that they use to invite people to their tours and for other consultation purposes. They have actively sought out the engagement of community members who may be affected by or have an interest in their forest management activities. Specialists have been contacted, and databases have been used to assist in conducting assessment of archeological, cultural, historical, and community significance.</p> <p>Pennsylvania Properties</p> <p>Clarion Junction and Penfield FMUs are part of a Sensitivity Registry to provide notification to persons with health conditions which will be notified prior to forestry activities. Adjoining neighbors are notified prior to forestry activities. Specialist have been contacted, and databases have been used to assist in conducting assessment of archeological, cultural, historical, and community significance.</p>

<p>4.4.b The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.</p>	<p>C</p>	<p>As described in 4.4.a, TCF takes effort to seek and considers the input from people who would most likely be affected by management activities.</p> <p>North Coast Timberlands The THP review process in CA includes a mandatory contact of adjacent and downstream landowners. Public access to the SYP and each THP is provided by CAL FIRE. Public notices of activities such as herbicide use are posted at least 30 days prior to planned activities and are filed with the county agriculture commissioner.</p> <p>Pennsylvania Properties Adjoining neighbors are notified prior to forestry activities. Specialist have been contacted, and databases have been used to assist in conducting assessment of archeological, cultural, historical, and community significance. Input is also received from state and county agencies.</p>
<p>4.4.c People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.</p>	<p>C</p>	<p>North Coast Timberlands Following the California Forest Practice Act Rules, each proposed THP on the North Coast FMUs is announced to all relevant parties with a request for input. Relevant parties include neighbors, tribes, and other members of the local community. This announcement is critical to the stakeholder consultation process for THPs.</p> <p>Pennsylvania Properties TCF notifies adjacent landowners prior to forestry operations. Input is also received from state and county agencies.</p>
<p>4.4.d For <i>public forests</i>, consultation shall include the following components: 1. Clearly defined and accessible methods for public participation are provided in</p>	<p>NA</p>	<p>TCF is not a public forest, so this criterion and associated indicators is not applicable.</p>

<p>both long and short-term planning processes, including harvest plans and operational plans;</p> <p>2. Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management;</p> <p>3. An accessible and affordable appeals process to planning decisions is available.</p> <p>Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.</p>		
<p>4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</p>	NE	-
<p>Principle #5: Forest management operations shall encourage the efficient use of the forest’s multiple products and services to ensure economic viability and a wide range of environmental and social benefits.</p>		
<p>5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and ensuring the investments necessary to maintain the ecological productivity of the forest.</p>	C	-
<p>5.1.a The forest owner or manager is financially able to implement core management activities, including all those environmental, social and operating costs, required to meet this Standard, and investment and reinvestment in forest management.</p>	C	<p>The WFF has significant assets for acquisition, and revenue from investments and management can be used to support forest management activities.</p> <p>North Coast Timberlands Observations of site conditions and conversations with FME staff and in-woods</p>

		<p>contractors demonstrate that TCF has funding necessary to carry out its core management objectives. All signs point to a financially healthy, well-funded organization that is able to maintain investments in conservation and restoration activities. For example, TCF has implemented many habitat improvement projects beyond the normal scope of certification as well as road upgrades to reduce the overall impact of the road systems on stream habitat and fisheries.</p> <p>Pennsylvania Properties TCF is financially able to meet the requirements of the FSC standard. This is demonstrated by its 10-year and 50-year planning horizons for each FMU, its partnerships with well-established third-party forest management companies, and annual budget. Interviews with third-party foresters indicate that there is sufficient professional expertise on staff and that the business is well-managed. Witnessed implementation of the annual budget and funding of unplanned events.</p>
<p>5.1.b Responses to short-term financial factors are limited to levels that are consistent with fulfillment of this Standard.</p>	<p>C</p>	<p>Resources are available for any short-term needs to conform to the Standard.</p>
<p>5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest’s diversity of products.</p>	<p>C</p>	<p>-</p>
<p>5.2.a Where forest products are harvested or sold, opportunities for forest product sales and services are given to local harvesters, value-added processing and manufacturing facilities, guiding services, and other operations that are able to offer services at competitive rates and levels of service.</p>	<p>C</p>	<p>North Coast Timberlands All recent sales have gone to local California-based logging contractors and log buyers. Much of the material harvested goes to the Mendocino Forest Products sawmill in Ukiah, CA and other local mills. Little opportunity exists for markets other than the traditional log and chip markets.</p>

		<p>Pennsylvania Properties</p> <p>Local contractors are used for timber sales and services when possible. Review of a sample of harvest contracts verifies this practice. Harvested wood is sold to local mills but is dependent on market conditions. Silviculture contractors are local contractors. Service providers and their employees are local to the property. Findings confirmed through interviews with contractors, service providers, and FME staff.</p>
<p>5.2.b The forest owner or manager takes measures to optimize the use of harvested forest products and explores product diversification where appropriate and consistent with management objectives.</p>	C	<p>North Coast Timberlands</p> <p>Utilization standards are very high and strictly enforced under contract language. Little opportunity exists for product diversification at this time, although TCF has explored alternate uses of forest products, such as the pole market.</p> <p>Pennsylvania Properties</p> <p>TCF explores ways to optimize the use of harvested forest products. Product diversification is a priority. Interviews confirm FME forest managers are aware of new markets opportunities for each property. Market opportunities are communicated to TCP through monthly operations reports.</p>
<p>5.2.c On public lands where forest products are harvested and sold, some sales of forest products or contracts are scaled or structured to allow small business to bid competitively.</p>	NA	<p>TCF is not a public forest, so this indicator is not applicable.</p>
<p>5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</p>	C	-
<p>5.3.a Management practices are employed to minimize the loss and/or waste of harvested forest products.</p>	C	<p>Harvested units inspected during the audit showed good utilization of merchantable material.</p>

<p>5.3.b Harvest practices are managed to protect residual trees and other forest resources, including:</p> <ul style="list-style-type: none"> • soil compaction, <i>rutting</i> and erosion are minimized; • residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected; • damage to NTFPs is minimized during management activities; and • techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible. 	<p>C</p>	<p>Site visits demonstrated that TCF foresters and contractors take great care to protect residual trees and soil properties during harvesting and forest operations. Contractors’ equipment was matched to the site conditions to minimize site impacts.</p> <p>Witnessed reports for monitoring conducted during harvesting operations. No issues identified. Various GIS databases are used to plan the logging activities to be scheduled during the time of the year to create the least damage to the site.</p>
<p>5.4. Forest management should strive to strengthen and diversify the local economy, avoiding dependence on a single forest product.</p>	<p>C</p>	<p>-</p>
<p>5.4.a The forest owner or manager demonstrates knowledge of their operation’s effect on the local economy as it relates to existing and potential markets for a wide variety of timber and non-timber forest products and services.</p>	<p>C</p>	<p>North Coast Timberlands</p> <p>TCF staff are close to the local communities and aware of the organization’s impact on the local economy. This is central to the land conservation work that TCF does in the region. TCF is clearly focused on supporting and contributing to the local economy through its hiring of local contractors and supplying local mills and markets.</p> <p>As part of their annual review, TCF calculates their estimated local economic impact (taxes, wages, contractors, local suppliers, etc.). The North Coast Forest Conservation Initiative annual report includes the Caspar Index, which is a measure of the cultural, environmental, economic, and social activities of TCF locally.</p> <p>Pennsylvania Properties</p> <p>Existing markets are identified for each FMU. Forest managers are knowledgeable of current and emerging markets. Discussions with forest</p>

		<p>managers demonstrated a high level of knowledge of TCF’s contribution to the local economy, including through providing employment to operators and other forestry service providers, supplying local mills, and purchasing equipment and materials from local suppliers.</p>
<p>5.4.b The forest owner or manager strives to diversify the economic use of the forest according to Indicator 5.4.a.</p>		<p>North Coast Timberlands TCF has actively pursued alternate revenue streams on the forest, including most notably forest carbon.</p> <p>Pennsylvania Properties Interviews confirm FME forest managers are aware of new markets opportunities for each property. Market opportunities are communicated to TCF through ongoing communication.</p>
<p>5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</p>	<p>C</p>	<p>-</p>
<p>5.5.a In developing and implementing activities on the FMU, the forest owner or manager identifies, defines and implements appropriate measures for maintaining and/or enhancing forest services and resources that serve public values, including municipal watersheds, fisheries, carbon storage and sequestration, recreation and tourism.</p>	<p>C</p>	<p>North Coast Timberlands TCF implements measures to maintain and/or enhance forest services that serve public values, including fisheries, recreation, and climate change mitigation through carbon sequestration. The properties are certified under the Climate Action Reserve for carbon sequestration. A few years ago, the FME obtained a grant from the Bechtel Foundation to help cover the cost of upgrading stream crossings that were not up to the current 100-year storm standard and which were not scheduled for upgrading in the near future as part of a THP; TCF covered the additional funding required to accomplish the needed work. Not long ago, a major large woody debris placement stream habitat improvement project was implemented on the North Fork of</p>

		<p>the Garcia River in cooperation with The Nature Conservancy and California Department of Fish and Wildlife. TCF continues to be involved in programs that support public values of forest resources, such as the broodstock program for re-populating the Garcia River with coho, community recreation, and many other examples.</p> <p>Pennsylvania Properties Management plans and site plans address implementation of BMPs. Water quality is protected for watersheds and fisheries through this implementation of BMPs. Wildlife habitat for game and non-games species is provided by a diversity of harvest sizes, species, and age classes, as well as through in-stand retention. TCF allows hunting, hiking, and other recreation on its properties.</p>
<p>5.5.b The forest owner or manager uses the information from Indicator 5.5.a to implement appropriate measures for maintaining and/or enhancing these services and resources.</p>	<p>C</p>	<p>See discussion in 5.5.a.</p>
<p>5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</p>	<p>C</p>	<p>-</p>
<p>5.6.a In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan.</p> <p>The sustained yield harvest level calculation for each planning unit is based on:</p> <ul style="list-style-type: none"> documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; 	<p>C</p>	<p>North Coast Timberlands TCF utilizes inventory data to model sustainable growth levels into the future. The Option A document approved by CAL FIRE includes the sustainability calculations for Garcia River, Gualala, and Big River and Salmon Creek properties. Option A under California Forest Practice Rules requires accurate inventory data and growth and harvest projection over the next 100-year planning period. This information is produced by a growth and yield model with inventory and management inputs and is reviewed by CAL FIRE as part of the approval process. The</p>

<ul style="list-style-type: none"> • mortality and decay and other factors that affect net growth; • areas reserved from harvest or subject to harvest restrictions to meet other management goals; • silvicultural practices that will be employed on the FMU; • management objectives and desired future conditions. <p>The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.</p>		<p>annual harvests from the four parcels on the North Coast are below the AAC calculated in the Option A document.</p> <p>TCF maintains a thorough inventory system with permanent plots on the North Coast, driven in part by its need to calculate carbon storage. A standard inventory is completed, and then growth is projected using CRYPTOS (the standard software for projecting conifer growth in the redwood region). Growth and yield projections rely on the established site classes for the forest area. Areas excluded from harvesting are not included in the calculation.</p> <p>Pennsylvania Properties The Timber Harvesting Sustainability Summary and Tracking report indicates harvest volumes are below forecasted annual harvest in forest management plan. ACC is calculated for 10 years. requires that in the period prior to and including 31 December 2026 the sustainable harvest level volume shall not exceed a total of 55,000 cords. During the time period from January 1, 2027 to December 31, 2037 the sustainable harvest level volumes shall not exceed 82,000 cords total.</p>
<p>5.6.b Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.</p>	<p>C</p>	<p>North Coast Timberlands Harvest levels on the North Coast FMUs provided to the audit team and published in the annual report are far below the AAC calculated in the approved Option A document.</p> <p>Pennsylvania Properties the Timber Harvesting Sustainability Summary and Tracking report indicates harvest volumes are below forecasted annual harvest in forest management plan. ACC is calculated for 10 years.</p>

<p>5.6.c Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.</p>	<p>C</p>	<p>North Coast Timberlands Previous owners of the TCF properties on the North Coast had overharvested as part of intensive industrial forest management practices. TCF’s light touch and low harvest levels are designed to increase standing stocks and accelerate the transition to a late seral forest.</p> <p>Using a combination of single tree selection and group selection, the restoration of depleted or overstocked stands is addressed. Examples of these stand treatments were observed during site visits and while touring the properties.</p> <p>Pennsylvania Properties Forest management planning emphasizes the importance of employing harvest strategies to address the desires of TCF to improve value of the standing timber, both financially and ecologically.</p>
<p>5.6.d For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.</p>	<p>NA</p>	<p>Other than forest carbon on the North Coast Timberlands, there is no commercial enterprise for NTFPs on TCF properties.</p>
<p>Principle #6: Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.</p>		
<p>6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and</p>	<p>C</p>	<p>-</p>

<p>the uniqueness of the affected resources -- and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be assessed prior to commencement of site-disturbing operations.</p>		
<p>6.1.a Using the results of <i>credible scientific analysis, best available information</i> (including relevant databases), and local knowledge and experience, an assessment of conditions on the FMU is completed and includes:</p> <ol style="list-style-type: none"> 1) Forest community types and development, size class and/or successional stages, and associated <i>natural disturbance regimes</i>; 2) <i>Rare, Threatened and Endangered (RTE) species</i> and <i>rare ecological communities</i> (including plant communities); 3) Other habitats and species of management concern; 4) Water resources and associated riparian habitats and hydrologic functions; 5) <i>Soil resources</i>; and 6) <i>Historic conditions</i> on the FMU related to forest community types and development, size class and/or successional stages, and a broad comparison of historic and current conditions. 	<p>C</p>	<p>North Coast Timberlands Site level conditions are assessed as part of THP process, including forest community types, RTE species, soil resources, botanical resources, and other requirements in this indicator. At a larger landscape level, the Integrated Resource Management Plans assesses these factors on the level of the individual tracts.</p> <p>Pennsylvania Properties The management plan for each FMU describes the outcomes of assessment of conditions on each FMU. These include:</p> <ol style="list-style-type: none"> 1) History and development of successional stages and the natural disturbance regimes that created the forest types; 2) RTE species are described and listed in the management plans; 3) Water resources including ponds and streams are described and included in the company’s various GIS systems; 4) Soil maps and depth to water table maps are used during management planning; and 5) Comparisons of the current and historical condition of the FMU in terms of communities and successional stages. <p>Several of these attributes are assessed as part of due diligence prior to purchasing the</p>

		<p>FMUs even before a management plan is developed.</p>
<p>6.1.b Prior to commencing site-disturbing activities, the forest owner or manager assesses and documents the potential short and long-term impacts of planned management activities on elements 1-5 listed in Criterion 6.1.a.</p> <p>The assessment must incorporate the best available information, drawing from scientific literature and experts. The impact assessment will at minimum include identifying resources that may be impacted by management (e.g., streams, habitats of management concern, soil nutrients). Additional detail (i.e., detailed description or quantification of impacts) will vary depending on the uniqueness of the resource, potential risks, and steps that will be taken to avoid and minimize risks.</p>	<p>C</p>	<p>North Coast Timberlands</p> <p>The state-required THP process requires assessment and extensive documentation of the short and long-term impacts to RTE species and rare ecological communities, other habitats and species of concern, and soil and water resources, among other values.</p> <p>Pennsylvania Properties</p> <p>Short and long-term impacts of harvest are described in each sampled management plan. Mitigations of impacts are found in the operations guidelines. Auditors confirmed that forest management practices aim to protect streams and other water values through appropriate buffer. Soil nutrients are addressed with operational guidelines for soil compaction and rutting, as well as nutrient availability with biomass guidelines. A long-term projection of impacts on habitat and size classes has been completed and operations are planned to insure a sustainable forest.</p>
<p>6.1.c Using the findings of the impact assessment (Indicator 6.1.b), management approaches and field prescriptions are developed and implemented that: 1) avoid or minimize negative short-term and long-term impacts; and, 2) maintain and/or enhance the long-term ecological viability of the forest.</p>	<p>C</p>	<p>North Coast Timberlands</p> <p>Review of THP documentation and observing on-the-ground management activities showed numerous examples of management approaches designed to reduce negative impacts, including using low impact logging techniques, altering harvest plans to accommodate RTE and other species of concern, use of streamside management zones, and the focus on uneven aged management.</p> <p>Pennsylvania Properties</p> <p>Contractor performance reports and site visit evaluation forms provides a mechanism for documenting any impacts of operations. Operational guidelines ensure that both short-</p>

		and long- term impacts are addressed for soils, water resources, and habitat conditions. This guidance insures the long-term ecological viability of the forest.
6.1.d On public lands, assessments developed in Indicator 6.1.a and management approaches developed in Indicator 6.1.c are made available to the public in draft form for review and comment prior to finalization. Final assessments are also made available.	NA	TCF is not a public forest so this indicator is not applicable.
6.2 Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.	C	-
6.2.a If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the 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.		North Coast Timberlands The state natural heritage database is reviewed as part of the THP process; any listed species are assumed to be present. Prior to the commencement of any planned site-disturbing activity, surveys are conducted to determine the presence of any RTE species. Botanical surveys are conducted by trained local botanists who work as contractors. Northern spotted owl (NSO) surveys are conducted prior to commencement of site-disturbing activities by trained survey crews. Pennsylvania Properties For Clarion Junction and Penfield FMUs, a survey was conducted during the development of the Forest Management Plan. An eagle has been identified nesting on Clarion Junction. A buffer has been established around the site. Witnessed buffer on maps.

		Penfield has been in forest management for an extensive period of time. RTE are not present on property.
<p>6.2.b When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. Conservation zones and/or protected areas are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.</p>	C	<p>North Coast Timberlands Modifications to management are made to protect or enhance RTE species, such as for fisheries, rare plants, and NSOs. Based on the results of NSO surveys described in 6.2.a, TCF has mapped nesting sites and activity centers on the North Coast FMUs. The sites are protected spatially and temporally. Field visits confirmed protection for other detected RTE species during timber harvesting, such as salmonid streamside buffer protection measures mandated by the California FPA Rules.</p> <p>Pennsylvania Properties An eagle has been identified nesting on Clarion Junction. A buffer has been established around the site. Witnessed buffer on maps.</p>
<p>6.2.c For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species’ recovery goals, as well as landscape level biodiversity conservation goals.</p>	NA	TCF is not a public forest so this indicator is not applicable.
<p>6.2.d Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).</p>	C	<p>North Coast Timberlands Public access to and use of the North Coast FMUs is limited to non-motorized recreation by permit only and occasionally woodcutting. The FME has one dedicated patrol staff to provide security on the North Coast. CA Department of Fish & Wildlife is the regulatory agency charged with control of wildlife and plant species to avoid the risk to vulnerable species and communities, and TCF works closely with the agency to achieve this goal.</p> <p>Pennsylvania Properties</p>

		<p>Gates are used to control access points. Clarion Junction and Penfield are enrolled in the PA Game Commission Public Access Program. The property is patrolled and monitored by the PA Game Commission. Activities are controlled to avoid risk to vulnerable species and communities.</p>
<p>6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</p>	<p>C</p>	
<p>6.3.a. Landscape-scale indicators</p>	<p>-</p>	
<p>6.3.a.1 The forest owner or manager maintains, enhances, and/or restores under-represented <i>successional</i> stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.</p>	<p>C</p>	<p>North Coast Timberlands</p> <p>On the North Coast FMUs, one of the central 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.</p> <p>To create late seral stages, several areas on the FMUs have restrictions on harvests, including in the Ecological Reserve on the Garcia River parcel with a conservation easement held by TNC. Upper diameter limits for harvest are in place, too. Current cut restrictions are no-cuts on redwood over 48 inches, Douglas-fir over 38 inches, and old growth. Other forest communities that receive special considerations include oak trees, red alder trees, grasslands and riparian communities, among others.</p> <p>Pennsylvania Properties</p> <p>For the Clarion Junction and Penfield FMUs, the management emphasizes the importance of the surrounding landscape in setting goals.</p>

		<p>The parcels are in a matrix of lands with a long history of active forest harvesting.</p> <p>The goal for Clarion Junction is to create early successional habitats which is under-represented in the landscape. Bringing the forest into a more regulated condition will facilitate this goal.</p> <p>The goal for Penfield includes improvement in species diversity and initiate new forest growth. The development of the under-represented early successional habitats is a part of this goal.</p>
<p>6.3.a.2 When a <i>rare ecological community</i> is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, <i>conservation zones</i> and/or <i>protected areas</i> are established where warranted.</p>	<p>C</p>	<p>North Coast Timberlands</p> <p>Management of the North Coast FMUs includes numerous examples of rare ecological community management to maintain, restore, or enhance the viability of forest communities. Among others, these include oak retention, red alder retention, grasslands, ecological reserves, riparian buffers along fish and non-fish bearing streams (buffers in the ecological reserve are larger than required by state regulation or FSC), road improvements to reduce impacts, stream restoration to provide additional spawning areas, in-stream large woody debris installments, and NSO habitat protections.</p> <p>Rare ecological communities identified on the forest have typically been categorized as HCVFs, e.g., pygmy forest and oak woodlands. These areas are not managed except as needed to maintain the HCV values.</p> <p>Pennsylvania Properties</p> <p>Natural resource inventory report has been conducted for Clarion Junction and Penfield using available databases and experts from state agencies. Assistance has been received</p>

		<p>in identifying and protecting significant natural communities. These areas are described in the management plans and are protected on the ground. Interviews confirmed no issues with management practices.</p>
<p>6.3.a.3 When they are present, management maintains the area, structure, composition, and processes of all Type 1 and Type 2 old growth. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.</p> <p>Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).</p> <p>Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).</p> <p>On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning</p>	<p>C</p>	<p>North Coast Timberlands</p> <p>No type 1 or type 2 old growth stands are present on the North Coast FMUs. Individual scattered old growth trees are not harvested. TCF has a no-cut policy on all old growth stands and trees on the North Coast properties.</p> <p>Pennsylvania Properties</p> <p>No old growth stands on the Clarion Junction and Penfield FMUs, as confirmed in interviews with staff and contractors and a review of inventory information.</p>

<p>from below in forest types when and where restoration is appropriate).</p> <p>On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> 1. Old growth forests comprise a significant portion of the tribal ownership. 2. A history of forest stewardship by the tribe exists. 3. High Conservation Value Forest attributes are maintained. 4. Old-growth structures are maintained. 5. Conservation zones representative of old growth stands are established. 6. Landscape level considerations are addressed. 7. Rare species are protected. 		
<p>6.3.b To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.</p>	<p>C</p>	<p>North Coast Timberlands</p> <p>On the North Coast, TCF’s management focus is restoring habitat conditions associated with late seral species. Their efforts to maintain, enhance, and restore such habitat conditions are exemplary.</p> <p>Pennsylvania Properties</p> <p>Overall management goals for Clarion Junction and Penfield include consideration for improvement of wildlife habitat on the property. Enhancements stated in objective for Clarion Junction include riparian areas and aesthetic areas.</p>
<p>6.3.c Management maintains, enhances and/or restores the plant and wildlife habitat of Riparian Management Zones (RMZs) to provide:</p> <ol style="list-style-type: none"> a) habitat for aquatic species that breed in surrounding uplands; 	<p>C</p>	<p>North Coast Timberlands</p> <p>TCF actively manages riparian areas to enhance habitat features on the North Coast FMUs. Examples include active placement of large woody debris in streams to increase the number of pools and fish habitats.</p>

<p>b) habitat for predominantly terrestrial species that breed in adjacent <i>aquatic habitats</i>;</p> <p>c) habitat for species that use riparian areas for feeding, cover, and travel;</p> <p>d) habitat for plant species associated with riparian areas; and,</p> <p>e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.</p>		<p>Several examples of projects to maintain, enhance and/or restore the riparian vegetation and the fish and wildlife habitat of riparian areas were reviewed during the field audit. Examples visited included buffers and maintenance of canopy cover on streams, stream crossing enhancement, tanoak removal, and protection of wildlife snags.</p> <p>Pennsylvania Properties Riparian zones are in place surrounding wetland areas in Clarion Junction and Penfield. Site visits confirmed presence of RMZs at multiple locations. Buffers were respected on RMZs with boundaries flagged and/or painted prior to harvesting. A Notification of Harvest is required for all harvesting. Interviews with person monitoring confirmed no issues has been identified.</p>
<p>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.</p>	<p>C</p>	<p>North Coast Timberlands On the North Coast, TCF’s management goals include maintaining and enhancing the natural distribution of plant species. Uneven-age management is consistent with the natural disturbance regimes for the coastal redwood region as described in TCF’s forest management plan. Tanoak is controlled only as much as necessary to reestablish conifer dominance on sites that were historically conifer-dominated.</p> <p>Pennsylvania Properties Management goals for Clarion Junction and Penfield include maintaining the natural distribution of plant species on the site. Field sites visited demonstrate that these goals are being met. Control of buckthorn is important to forestry operations. Controls are included in most forestry operations.</p>
<p>6.3.e When planting is required, a local source of known provenance is used when</p>	<p>C</p>	<p>North Coast Timberlands</p>

<p>available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. Native species suited to the site are normally selected for regeneration.</p>		<p>For the North Coast FMUs, a limited amount of planting is done when natural regeneration is insufficient. Planting stock is from appropriate local seed zones.</p> <p>Pennsylvania Properties For Clarion Junction and Penfield, planting is not done. All regeneration is natural as observed in the field and confirmed during interviews.</p>
<p>6.3.f Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include:</p> <ul style="list-style-type: none"> a) large live trees, live trees with decay or declining health, snags, and well-distributed coarse down and dead woody material. Legacy trees where present are not harvested; and b) vertical and horizontal complexity. <p>Trees selected for retention are generally representative of the dominant species found on the site.</p>	<p>C</p>	<p>North Coast Timberlands The use of single-tree selection and group selection on no more than 20% of the North Coast FMUs provides habitat components and stand structures that could be expected from naturally-occurring processes. Large live trees, legacy trees, and snags are maintained across the landscape, as confirmed by auditors; these are generally marked with a “W” in the field to provide retention during harvest. 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.</p> <p>Pennsylvania Properties For Clarion Junction and Penfield, large live trees, legacy trees, and snags are maintained across the landscape. These are generally marked with a “W” in the field to provide retention during harvest. 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.</p>
<p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when even-aged systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest</p>	<p>C</p>	<p>North Coast Timberlands On the North Coast, even-age management is limited to 1-acre group selection cuts in planted areas in existence when the property was acquired by TCF. Currently, the age of</p>

<p>unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>		<p>these stands requires pre-commercial thinning as the primary management technique. Even-age methods such as clearcutting, seed tree removal, and shelterwood removal are not modeled for the approved Option A on the North Coast. However, these even-age systems may be used in the event of severe damage resulting from natural causes such as fire or wind to capture mortality and regenerate the site.</p> <p>Pennsylvania Properties Clarion Junction and Penfield use uneven-aged management.</p>
<p>Northeast Indicator 6.3.g.1.a Silvicultural systems favor natural regeneration where appropriate, and forest operations are planned to protect pre-established natural regeneration of desirable species.</p>	C	<p>Pennsylvania Properties Natural regeneration is primarily used.</p>
<p>Pacific Coast 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.</p>	NA	<p>North Coast Timberlands No harvest openings of this size occur. Largest gaps are limited to 1 acre as part of group selections. Therefore, this indicator is not applicable.</p>
<p>Pacific Coast Indicator 6.3.g.1.b Even-aged silviculture may be employed where: 1) native species require openings for</p>	NA	<p>North Coast Timberlands Even aged silviculture is not used (openings are limited to 1 acre, which are essentially</p>

<p>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.</p> <p><i>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.</i></p>		<p>group selection cuts), so this indicator is not applicable.</p>
<p>Pacific Coast 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.</p>	<p>C</p>	<p>North Coast Timberlands Snags are protected. TCF's limited group openings are unlikely to result in windthrow effects, and no such damage was seen during site visits.</p>
<p>Pacific Coast 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.</p>	<p>C</p>	<p>North Coast Timberlands 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.</p>
<p>Pacific Coast Indicator 6.3.g.1.e If regeneration harvest ages do not approach <i>culmination of mean annual increment</i> (CMAI), retention approaches the upper end of the range required in Indicator 6.3.h.1.a (above).</p>	<p>NA</p>	<p>North Coast Timberlands This indicator pertains more so to even-aged management than to the individual tree and small group selection cuts that occur on TCF's properties, so this indicator is not applicable.</p>
<p>Pacific Coast 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</p>	<p>NA</p>	<p>North Coast Timberlands This indicator pertains more so to large, even-aged cuts than to the individual tree and small group selection cuts that occur on TCF's properties, so this indicator is not applicable.</p>

<p>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.</p>		
<p>6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> 1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture). 2. Is based on the totality of the best available information including peer-reviewed science regarding natural disturbance regimes for the FMU. 3. Is spatially and temporally explicit and includes maps of proposed openings or areas. 4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species. 5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings. 	<p>NA</p>	<p>TCF is not pursuing this option for any of its FSC-certified FMUs, so this indicator is not applicable.</p>
<p>6.3.h The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to</p>	<p>C</p>	<p>North Coast Timberlands TCF has invasive species management plans for the North Coast FMUs that includes</p>

<p>prevent or control <i>invasive species</i>, including:</p> <ol style="list-style-type: none"> 1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems; 2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread; 3. eradication or control of established invasive populations when feasible: and, 4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species. 		<p>detection, control and monitoring. Invasive species management is done primarily through herbicide use, focused on areas where invasives can be contained. The main invasives targeted are jubata grass (<i>Cortaderia jubata</i>), French broom (<i>Genista monspessulana</i>), bull thistle (<i>Cirsium vulgare</i>), and Italian thistle (<i>Carduus pycnocephalus</i>). No herbicides are used on the Big River and Salmon Creek FMU.</p> <p>Pennsylvania Properties Buckthorn is the primary invasive species on Clarion Junction and Penfield. All forest operations include steps for the control of Buckthorn. Witnessed and discussed during site visits.</p>
<p>6.3.i In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.</p>	<p>C</p>	<p>North Coast Timberlands On the North Coast, fuels management practices are generally limited to treatment of slash following logging. Wildfires are uncommon in the redwood belt of Northern California because of the relatively wet conditions, although they do occur occasionally, especially during extreme drought periods.</p> <p>In 2016, Mendocino County has passed an ordinance declaring trees intentionally killed and left standing as a public nuisance and establishing a fine for violations. This regulation could impact the application of herbicide using the hack-and-squirt method to tanoaks on the North Coast FMUs, although it is not clear that this would constitute a violation.</p> <p>Pennsylvania Properties Fires are uncommon and fuel management is rarely addressed on the Clarion Junction and Penfield.</p>

<p>6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</p>	<p>C</p>	<p>-</p>
<p>6.4.a The forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the landscape (see Criterion 7.1). The assessment for medium and large forests include some or all of the following: a) GAP analyses; b) collaboration with state natural heritage programs and other public agencies; c) regional, landscape, and watershed planning efforts; d) collaboration with universities and/or local conservation groups.</p> <p>For an area that is not located on the FMU to qualify as a Representative Sample Area (RSA), it should be under permanent protection in its natural state.</p>	<p>C</p>	<p>North Coast Timberlands The FME has developed much of its North Coast program based on regional ecologically-focused assessments and plans. <i>Conservation Prospects for the North Coast: A Review and Analysis of Existing Conservation Plans, Land Use Trends and Strategies for Conservation on the North Coast of California</i>, prepared by the FME in August 2005, provides a collection and synthesis of conservation plans on the North Coast. The accompanying report, <i>Program on High Conservation Value Forests, Imperiled Species, and Representative Sample Areas</i>, was updated in 2018 and includes a review of regional ecologically-focused assessments and plans.</p> <p>Pennsylvania Properties For Clarion Junction and Penfield, forest management plan has included the landscape context of the forest ecosystem, including communities that would naturally exist on the FMU.</p>
<p>6.4.b Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes.</p>	<p>C</p>	<p>North Coast Timberlands As described in <i>Conservation Prospects for the North Coast: A Review and Analysis of Existing Conservation Plans, Land Use Trends and Strategies for Conservation on the North Coast of California</i> (see discussion in 6.4.a) and in the updated reassessment, <i>Program on High Conservation Value Forests, Imperiled Species, and Representative Sample Areas</i>, the FME has concluded that because of the widespread protected nature of lands in the region, the regulatory system restricting land use change</p>

<p>Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU.</p>		<p>and harvest practices, and the existing pattern of habitat conditions and ecological processes present on the landscape, designating RSAs on their property is unnecessary and would not be ecologically beneficial.</p> <p>Pennsylvania Properties No RSAs have been identified on the Clarion Junction or Penfield FMUs.</p>
<p>6.4.c Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances:</p> <ul style="list-style-type: none"> a) harvesting activities only where they are necessary to restore or create conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated. 	<p>NA</p>	<p>No RSAs are designated, so this indicator is not applicable.</p>
<p>6.4.d The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.</p>	<p>C</p>	<p>North Coast Timberlands The FME has developed much of its North Coast program based on regional ecologically-focused assessments and plans. <i>Conservation Prospects for the North Coast: A Review and Analysis of Existing Conservation Plans, Land Use Trends and Strategies for Conservation on the North Coast of California</i>, prepared by the FME in August 2005, provides a collection and synthesis of conservation plans on the North Coast. The accompanying report, <i>Program on High Conservation Value Forests, Imperiled Species, and Representative Sample Areas</i>, was updated in 2018. Following a review of regional conservation plans, TCF maintains its previous position that because of the</p>

		<p>widespread protected nature of the region, the extensive regulatory system restricting land use change and harvest practices, and the existing pattern of habitat conditions and ecological processes present on the landscape, the designation of additional RSAs is unnecessary and would not be ecologically beneficial.</p> <p>Pennsylvania Properties On Clarion Junction and Penfield, a survey was conducted during the development of the Forest Management Plan. Property has been in forest management for an extensive period of time. Ongoing assessment is conducted prior to management activities.</p>
<p>6.4.e Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.</p>	NA	<p>TCF is not a public forest, so this indicator is not applicable.</p>
<p>6.5 Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.</p>	C	-
<p>6.5.a The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.</p>	C	<p>North Coast Timberlands TCF has written road management policies contained in its policy digest for the North Coast properties.</p> <p>Pennsylvania Properties Strategy for dealing with erosion control is documented in the Working Forest Fund Guidelines Digest. Additional guidelines are included in the erosion control areas of the HCVF Assessment and Management Plan.</p>
<p>6.5.b Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the</p>	C	<p>North Coast Timberlands On the North Coast FMUs, field inspections overall showed compliance with BMPs.</p>

<p>operation takes place.</p>		<p>Interviews with FME staff and contracted operators demonstrate a thorough knowledge of proper BMP installation.</p> <p>Pennsylvania Properties For Clarion Junction and Penfield, review of monitoring reports confirm BMPs are met during operations. Field inspections showed compliance with best management practices.</p>
<p>6.5.c Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed:</p> <ul style="list-style-type: none"> • Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard. • Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site. • Rutting and compaction is minimized. • Soil erosion is not accelerated. • Burning is only done when consistent with natural disturbance regimes. • Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives. • Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed. • Low impact equipment and technologies is used where 	<p>C</p>	<p>North Coast Timberlands On the North Coast, field inspections showed overall compliance with this indicator. Slash was often lopped and scattered onsite to protect from soil erosion. No rutting or compaction was observed at field sites. Cable yarding is used on steeper slopes, which reduces soil impacts associated with logging. No prescribed fire is used.</p> <p>Pennsylvania Properties For Clarion Junction and Penfield, field inspections showed timing of activities and matching of contractors equipment to ground conditions meet requirement.</p>

appropriate.		
<p>6.5.d The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes:</p> <ul style="list-style-type: none"> • access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel, is controlled, as possible, to minimize ecological impacts; • road density is minimized; • erosion is minimized; • sediment discharge to streams is minimized; • there is free upstream and downstream passage for aquatic organisms; • impacts of transportation systems on wildlife habitat and migration corridors are minimized; • area converted to roads, landings and skid trails is minimized; • habitat fragmentation is minimized; • unneeded roads are closed and rehabilitated. 	C	<p>North Coast Timberlands</p> <p>TCF’s transportation system on the FMUs evaluated this year are generally well-designed, well-maintained, and in excellent shape. TCF works to minimize road density and closes unnecessary roads with the goal of making them “hyrdologically invisible,” meaning that the fill is pulled up to make them impassable, crossings are removed, and tree planting is done. The organization is also making a strong push to locate new roads in upland areas rather than in sensitive riparian zones as previous owners had done. Most roads are gated to control vehicle use and damage to the road network.</p> <p>On the Buckeye FMU, some roads on the were observed with rilling, rutting, and slides. A road assessment has been started for the FMU, but there is no timeline for completion. The audit team recognizes that the FME is only just now beginning to conduct timber management activities on the Buckeye FMU; these activities may serve as opportunities to upgrade and improve such roads. The FME would benefit from clarifying the priority and plan for addressing roads on the FMU. An OBS was issued (see Finding 2019.2).</p> <p>Pennsylvania Properties</p> <p>For Clarion Junction and Penfield, site visits confirmed that TCF’s transportation network met the requirements in this indicator.</p>
<p>6.5.e.1 In consultation with appropriate expertise, the forest owner or manager implements written <i>Streamside Management Zone (SMZ) buffer</i> management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water</p>	C	<p>North Coast Timberlands</p> <p>The California FPA Rules include explicit requirements for designation and protection of SMZs on the North Coast FMUs; TCF’s internal requirements are generally even more restrictive. SMZ buffers are delineated and implemented through consultation with CAL</p>

<p>quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers.</p> <p>In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.</p>		<p>FIRE, fisheries biologists, and other experts as required. Field visits confirm implementation of SMZ buffers.</p> <p>Pennsylvania Properties For Clarion Junction and Penfield, SMZs were sufficient per site visits.</p>
<p>Pacific Coast Indicator 6.5.e.1.a 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:</p> <ul style="list-style-type: none"> 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 	<p>C</p>	<p>North Coast Timberlands TCF has a 50-foot no harvest buffer on Class 1 watercourses (equivalent to Category A).</p>

<p>the use of such equipment is the lowest impact alternative</p> <p>avoid disturbance of mineral soil; where disturbance is unavoidable, mulch and seed are applied before the rainy season</p> <p>avoid the spread of pathogens and noxious weeds</p> <p>avoid road construction and reconstruction.</p>		
<p>Pacific Coast Indicator 6.5.e.1.b 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:</p> <p>single-tree or group selection silviculture is used</p> <p>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</p> <p>new road construction is avoided and reconstruction enhances riparian functions and reduces sedimentation;</p> <p>disturbance of mineral soil is avoided; where disturbance is unavoidable, mulch and seed are applied before the rainy season</p>	C	<p>North Coast Timberlands</p> <p>TCF’s general management practices are limited to single tree or group selection, meaning this indicator for Category A streams is met by default for harvests within the outer buffer zone (where only single-tree selection occurs currently).</p>
<p>Pacific Coast Indicator 6.5.e.1.c 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</p>	C	<p>North Coast Timberlands</p> <p>For Category B streams, the interior buffer is within a no harvest area, and the outer buffer falls within a single tree selection area.</p>

<p>100 feet) is created and managed according to provisions for outer buffer for Category A.</p>		
<p>Pacific Coast Indicator 6.5.e.1.d 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.</p>	<p>C</p>	<p>North Coast Timberlands For Category C streams, buffer requirements are met through use of single tree selection.</p>
<p>Pacific Coast Indicator 6.5.e.1.e 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.</p>	<p>C</p>	<p>North Coast Timberlands For Category D streams, buffer are requirements met through use of single tree selection.</p>
<p>6.5.e.2 Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or</p>	<p>NA</p>	<p>No variations have been requested for any of TCF's FMUs, so this indicator is not applicable.</p>

<p>manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.</p>		
<p>6.5.f Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of <i>aquatic habitat</i>. Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.</p>	C	<p>North Coast Timberlands Stream crossings on the North Coast were inspected and found to be in overall compliance with BMPs.</p> <p>Pennsylvania Properties On the Clarion Junction and Penfield FMUs, stream crossings were inspected during site visits and found to be in overall compliance with BMPs. Review of monitoring reports indicated no issues were found and stream crossings were in compliance with BMPs.</p>
<p>6.5.g Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.</p>	C	<p>North Coast Timberlands On the North Coast, recreation is managed through a permit system. A dedicated patrol officer helps to enforce the limited recreation and ensure that recreation does not negatively impact soils, water, plants, fisheries and wildlife, and wildlife habitats.</p> <p>Pennsylvania Properties For Clarion Junction and Penfield, the parcels are generally open to recreation throughout the year, with restricted motorized access.</p>

<p>6.5.h Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.</p>	<p>C</p>	<p>No domestic grazing occurs on any of TCF's properties.</p>
<p>6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</p>	<p>C</p>	<p>-</p>
<p>6.6.a No products on the FSC list of Highly Hazardous Pesticides are used (see FSC-POL-30-001 EN FSC Pesticides policy 2005 and associated documents).</p>	<p>C</p>	<p>Chemicals used for forest management provided to the audit team are not listed on FSC list of Highly Hazardous Pesticides. List of chemicals used were provided to the audit team for all FMUs. Chemicals are commonly used for forest management on all FMUs.</p> <p>The Big River FMU has an easement with a utility company that allows the easement holder to control vegetation in the utility right-of-way; FME management and staff stated that pesticides are applied by the utility company in the right-of-way. The holder of an easement for a pipeline right-of-way may also be using chemicals. The audit team clarified via interviews with FME personnel that the FME has not requested pesticide use from or placed pesticide use restrictions on the utility company nor any other parties holding</p>

		<p>easements with use rights. An OBS was issued (see Finding 2019.1).</p>
<p>6.6.b All toxicants used to control pests and competing vegetation, including rodenticides, insecticides, herbicides, and fungicides are used only when and where non-chemical management practices are: a) not available; b) prohibitively expensive, taking into account overall environmental and social costs, risks and benefits; c) the only effective means for controlling invasive and exotic species; or d) result in less environmental damage than non-chemical alternatives (e.g., top soil disturbance, loss of soil litter and down wood debris). If chemicals are used, the forest owner or manager uses the least environmentally damaging formulation and application method practical.</p> <p>Written strategies are developed and implemented that justify the use of chemical pesticides. Whenever feasible, an eventual phase-out of chemical use is included in the strategy. The written strategy shall include an analysis of options for, and the effects of, various chemical and non-chemical pest control strategies, with the goal of reducing or eliminating chemical use.</p>	<p>C</p>	<p>North Coast Timberlands Herbicides are the primary method of control for invasive species and undesirable tanoak. Alternate methods have been investigated and used, such mechanical control, although these options are usually prohibitively expensive. TCF is committed to reducing pesticide use through a targeted approach that only focuses on individual tanoaks that would shade out competing conifers, not the broad scale application to all hardwoods that past managers of the land used. Justification of herbicide use and application is in <i>Herbicide Application and Hardwood Management Policy</i>.</p> <p>Pennsylvania Properties Written plans are developed by applicator for a stated forest management purpose. Chemical plans were witnessed by audit team during site visits. Application rates were prescribed on a site-by-site basis based on the site and the planned outcome.</p>
<p>6.6.c Chemicals and application methods are selected to minimize risk to non-target species and sites. When considering the choice between aerial and ground application, the forest owner or manager evaluates the comparative risk to non-target species and sites, the comparative risk of worker exposure, and the overall amount and type of chemicals required.</p>	<p>C</p>	<p>North Coast Timberlands No aerial spraying is used. Herbicide application is typically done through frilling – hand application where the chemical is inserted into the tree (i.e., hack and squirt method of application).</p> <p>Pennsylvania Properties For all FMUs, chemicals and application methods are site specific. Prescriptions are developed by applicators to achieve desired objective for forest management. Application</p>

		<p>method is also determined during the site visit to minimize the risk of off-site spray and impact on adjoining landowners, as confirmed through interviewed with Service Providers.</p> <p>During site visit on Clarion Junction, it was observed that the prescriptions and application methods varied by site to meet specific needs. Off-site risk was minimized with prescription. Chemicals were applied at the appropriate season to avoid damaging non-target species. Applications were by ground.</p>
<p>6.6.d Whenever chemicals are used, a written prescription is prepared that describes the site-specific hazards and environmental risks, and the precautions that workers will employ to avoid or minimize those hazards and risks, and includes a map of the treatment area. Chemicals are applied only by workers who have received proper training in application methods and safety. They are made aware of the risks, wear proper safety equipment, and are trained to minimize environmental impacts on non-target species and sites.</p>	<p>C</p>	<p>Written maps, and shape files are provided to the applicator. Prescriptions are developed by the applicator, discussed, and approved by the service provider prior to application. Applicators are state-licensed and their employees have received proper training for chemical use. Insurance, contracts, and license were witnessed for all applicators.</p>
<p>6.6.e If chemicals are used, the effects are monitored and the results are used for adaptive management. Records are kept of pest occurrences, control measures, and incidences of worker exposure to chemicals.</p>	<p>C</p>	<p>North Coast Timberlands Records are kept of pest occurrences and application of chemicals. Monitoring occurs following application.</p> <p>Pennsylvania Properties During application, the third-party service provider is present onsite with contractors on all FMUs. Applicator provides application records following prescription. Third-party forest managers monitor results periodically for effectiveness following application. Application records and monitoring records were witnessed by the audit team. Effectiveness of application was witnessed</p>

		during site visit. No negative impacts were witnessed.
6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.	C	-
6.7.a The forest owner or manager, and employees and contractors, have the equipment and training necessary to respond to hazardous spills	C	<p>North Coast Timberlands Contractors are required to carry spill kits and be trained in their use. Onsite inspections of active harvest sites and interviews with contractors confirmed that these requirements are met.</p> <p>Pennsylvania Properties Interviews confirm service providers are knowledgeable on spill response. Loggers receive training in spill response during state logger training programs. Chemical applicators receive training during licensing. No issues identified during site visits.</p>
6.7.b In the event of a hazardous material spill, the forest owner or manager immediately contains the material and engages qualified personnel to perform the appropriate removal and remediation, as required by applicable law and regulations.	C	Spills are promptly contained when they occur. Spills above the reporting threshold are reported to the state regulators.
6.7.c. Hazardous materials and fuels are stored in leak-proof containers in designated storage areas, that are outside of riparian management zones and away from other ecological sensitive features, until they are used or transported to an approved off-site location for disposal. There is no evidence of persistent fluid leaks from equipment or of recent groundwater or surface water contamination.	C	<p>No evidence of hazardous materials or equipment near RMZs or sensitive areas. All RMZs include equipment exclusion zones as a standard protection measure. No leaks or spills were noted around equipment.</p> <p>Contracts require safe handling and spills prevention. All herbicide contractors are licensed applicators. A sample of licenses and contracts witnessed. Herbicide contractors are responsible for transporting, handling and disposition of containers.</p>
6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with	C	-

national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.		
6.8.a Use of <i>biological control agents</i> are used only as part of a pest management strategy for the control of invasive plants, <i>pathogens</i> , insects, or other animals when other pest control methods are ineffective, or are expected to be ineffective. Such use is contingent upon peer-reviewed scientific evidence that the agents in question are non-invasive and are safe for native species.	NA	FME does not use biological control agents.
6.8.b If biological control agents are used, they are applied by trained workers using proper equipment.	NA	FME does not use biological control agents.
6.8.c If biological control agents are used, their use shall be documented, monitored and strictly controlled in accordance with state and national laws and internationally accepted scientific protocols. A written plan will be developed and implemented justifying such use, describing the risks, specifying the precautions workers will employ to avoid or minimize such risks, and describing how potential impacts will be monitored.	NA	FME does not use biological control agents.
6.8.d Genetically Modified Organisms (GMOs) are not used for any purpose	C	FME does not use GMOs.
6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.	C	No exotic species are used by the FME.
6.9.a The use of <i>exotic species</i> is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.	C	FME does not use exotic species.
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	FME does not use exotic species.

<p>6.9.c The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species</p>	<p>NA</p>	<p>FME does not use exotic species.</p>
<p>6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion: a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</p>	<p>C</p>	<p>-</p>
<p>6.10.a Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion entails a very limited portion of the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	<p>C</p>	<p>FME has not converted forest to non-forest land.</p>
<p>6.10.b Forest <i>conversion</i> to non-forest land uses does not occur on high conservation value forest areas (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	<p>C</p>	<p>FME has not converted forest to non-forest land.</p>
<p>6.10.c Forest <i>conversion</i> to non-forest land uses does not occur, except in circumstances where conversion will enable clear, substantial, additional, secure, long term conservation benefits across the forest management unit (note that Indicators 6.10.a, b, and c are related and all need to be conformed with for conversion to be allowed).</p>	<p>C</p>	<p>FME has not converted forest to non-forest land.</p>
<p>6.10.d Natural or semi-natural stands are not converted to plantations. Degraded, semi-natural stands may be converted to restoration plantations.</p>	<p>C</p>	<p>FME has not converted forest to non-forest land.</p>

<p>6.10.e Justification for land-use and stand-type conversions is fully described in the long-term management plan, and meets the biodiversity conservation requirements of Criterion 6.3 (see also Criterion 7.1.l)</p>	<p>NA</p>	<p>FME has not converted forest to non-forest land.</p>
<p>6.10.f Areas converted to <i>non-forest use</i> for facilities associated with subsurface mineral and gas rights transferred by prior owners, or other conversion outside the control of the certificate holder, are identified on maps. The forest owner or manager consults with the CB to determine if removal of these areas from the scope of the certificate is warranted. To the extent allowed by these transferred rights, the forest owner or manager exercises control over the location of surface disturbances in a manner that minimizes adverse environmental and social impacts. If the certificate holder at one point held these rights, and then sold them, then subsequent conversion of forest to non-forest use would be subject to Indicator 6.10.a-d.</p>	<p>NA</p>	<p>FME has not converted forest to non-forest land.</p>
<p>Principle #7: A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</p> <p>Not evaluated this year.</p>		
<p>Principle #8: Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.</p> <p><i>Applicability Note: On small and medium-sized forests (see Glossary), an informal, qualitative assessment may be appropriate. Formal, quantitative monitoring is required on large forests and/or intensively managed forests.</i></p>		
<p>8.1 The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over</p>	<p>NE</p>	<p>-</p>

<p>time to allow comparison of results and assessment of change.</p>		
<p>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.</p>	<p>C</p>	<p>-</p>
<p>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.</p>	<p>C</p>	<p>North Coast Timberlands On the North Coast, inventory plots are established as part of TCF’s forest carbon assessment. Data is collected on species, volume, general stand composition, regeneration, brush species, snags and course woody material, and timber quality. Additionally, an inventory of timber is conducted approximately every 10 years when Option A, the primary harvest planning document, is updated. There are permanent plots on some forests that are re-measured every 10 years to assess forest growth. Pre- and post-harvest cruises are conducted for harvest sites. Inventory is updated at that time for the harvested areas.</p> <p>Pennsylvania Properties For Clarion Junction and Penfield, inventory is developed at that time of acquisition. Annual updated are made for changes in inventory. A 10-year planning horizon is used. Required elements witnessed in inventory.</p>
<p>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</p>	<p>C</p>	<p>North Coast Timberlands On the North Coast, unanticipated removal is accounted for in the forest inventory system and is monitored. Back in 2012, there was a 700-acre wildfire that resulted in removal of</p>

<p>disturbance, extent and severity of loss, and may be both quantitative and qualitative.</p>		<p>timber (the area was re-inventoried), but there have been no significant unanticipated removals since. TCF staff have a regular presence on the ground, so they can quickly detect, record, and monitor such losses.</p> <p>Pennsylvania Properties For Clarion Junction and Penfield, no such losses have occurred.</p>
<p>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.</p>	<p>C</p>	<p>North Coast Timberlands The FME keeps records of all harvested timber on the North Coast, including volume, product, and grade. For forest carbon (the only commercial NTFP on the parcels), meticulous records are kept of numerous metrics.</p> <p>Pennsylvania Properties The FME also keeps records of all harvested timber on Clarion Junction and Penfield, including volume, product, and grade. No NTFPs are harvested in commercial quantities.</p>
<p>8.2.c The forest owner or manager periodically obtains data needed to monitor presence on the FMU of:</p> <ol style="list-style-type: none"> 1) Rare, threatened and endangered species and/or their <i>habitats</i>; 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). 	<p>C</p>	<p>North Coast Timberlands On the North Coast, monitoring of RTE species occurs prior to harvest when such species have been identified as part of the THP process. The FME annually contracts NSO and rare plant surveys. Invasive species and control measures are monitored as part of the THP process. The Garcia River ERN is monitored by TNC. HCVF monitoring is recorded as part of FME’s annual review.</p> <p>Pennsylvania Properties For Clarion Junction and Penfield, various databases are used to continually update the GIS. A team of 3 GIS professional manage the GIS. Witness layers in the GIS for required elements.</p>
<p>8.2.d.1 Monitoring is conducted to ensure that site specific plans and operations are</p>	<p>C</p>	<p>FME foresters are in regular communication with operators during active harvests. A</p>

<p>properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.</p>		<p>forester drops by each active site at least twice a week, according to interviews with staff and contractors. These site visits serve to ensure that harvest plans are properly implemented, including harvest prescriptions and the installation of BMPs. Post-harvest review of volume harvested (e.g., post-harvest inventory) occurs by the forester administering the sale. Foresters also monitor harvested sites for regeneration and survival of any plantings, persistence of BMPs, longevity of snags, and other important environmental attributes.</p>
<p>8.2.d.2 A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.</p>	<p>C</p>	<p>North Coast Timberlands On the North Coast, the FME has conducted a road inventory of all forests. Per state law, any new road construction requires a 1600 permit and general discharge waiver, which essentially functions as a monitoring mechanism for the FME. Additionally, completed THPs have a mandatory 3-year monitoring requirement per state law. Security patrol personnel continuously monitor the road system conditions on the forests. After the first big rain even of the wet season or after major storms, FME personnel drive the roads to assess any damage needing repairs.</p> <p>Pennsylvania Properties The FME keeps records of all harvested timber on Clarion Junction and Penfield, including volume, product, and grade. No NTFPs are harvested in commercial quantities.</p>
<p>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</p>	<p>C</p>	<p>North Coast Timberlands TCF documents the results of its social impacts monitoring as part of annual reports found on its web page. For example, North Coast Forest Conservation Initiative Annual Reports include economic indicators, such as number of</p>

<p>4.1.b), and local purchasing opportunities (see Indicator 4.1.e).</p>		<p>contractors hired and local purchases made in a given year.</p> <p>Pennsylvania Properties For Clarion Junction and Penfield, inventory is continually updated for changes from harvesting and silviculture operations.</p>
<p>8.2.d.4 Stakeholder responses to management activities are monitored and recorded as necessary.</p>	<p>C</p>	<p>North Coast Timberlands TCF staff maintains logs of outreach and communication with the local public for each FMU, as well as documents any complaints or conflicts that arise. Based on interviews with stakeholders, TCF is well regarded in the local communities as a good forest steward and an important contributor to local economies.</p> <p>Pennsylvania Properties A complaint process is in place for Clarion Junction and Penfield. Witnessed folder for Clarion Junction.</p>
<p>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).</p>	<p>C</p>	<p>North Coast Timberlands On the North Coast, no sites of cultural significance have yet been found. While planning a THP, the lead forester consults with tribes who historically occupied the area; this is a requirement of the California FPA Rules if an archeological site is found.</p> <p>Pennsylvania Properties The FME also keeps records of all harvested timber on Clarion Junction and Penfield, including volume, product, and grade. No NTFPs are harvested in commercial quantities.</p>
<p>8.2.e The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency.</p>	<p>C</p>	<p>North Coast Timberlands All costs and revenues, including those for each harvest unit and other management activities, are tracked as part of normal business operations.</p> <p>Pennsylvania Properties</p>

		For Clarion Junction and Penfield, inventory is updated based on activities. Harvest volumes are calculated during the time of harvests.
8.3 Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody."	NE	-
8.4 The results of monitoring shall be incorporated into the implementation and revision of the management plan.	NE	-
8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.	NE	-
<p>Principle #9: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</p> <p>High Conservation Value Forests are those that possess one or more of the following attributes:</p> <ul style="list-style-type: none"> a) Forest areas containing globally, regionally or nationally significant: concentrations of biodiversity values (e.g., endemism, endangered species, refugia); and/or large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance b) Forest areas that are in or contain rare, threatened or endangered ecosystems c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control) d) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities' traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities). <p>Examples of forest areas that <i>may have</i> high conservation value attributes include, but are not limited to:</p> <p>Central Hardwoods:</p> <ul style="list-style-type: none"> • Old growth – (see Glossary) (a) • Old forests/mixed age stands that include trees >160 years old (a) • Municipal watersheds –headwaters, reservoirs (c) 		

- Rare, Threatened, and Endangered (RTE) ecosystems, as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund’s Forest Communities of Highest Conservation Concern, and/or Great Lakes Assessment (b)
- Intact forest blocks in an agriculturally dominated landscape (refugia) (a)
- Intact forests >1000 ac (valuable to interior forest species) (a)
- Protected caves (a, b, or d)
- Savannas (a, b, c, or d)
- Glades (a, b, or d)
- Barrens (a, b, or d)
- Prairie remnants (a, b, or d)

North Woods/Lake States:

- Old growth – (see Glossary) (a)
- Old forests/mixed age stands that include trees >120 years old (a)
- Blocks of contiguous forest, > 500 ac, which host RTEs (b)
- Oak savannas (b)
- Hemlock-dominated forests (b)
- Pine stands of natural origin (b)
- Contiguous blocks, >500 ac, of late successional species, that are managed to create old growth (a)
- Fens, particularly calcareous fens (c)
- Other non-forest communities, e.g., barrens, prairies, distinctive geological land forms, vernal pools (b or c)
- Other sites as defined by GAP analysis, Natural Heritage Inventory, and/or the World Wildlife Fund’s Forest Communities of Highest Conservation Concern (b)

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

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

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

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

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

<p>9.1 Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</p>	<p>NE</p>	<p>-</p>
<p>9.2 The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</p>	<p>NE</p>	<p>-</p>
<p>9.3 The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.</p>	<p>NE</p>	<p>-</p>
<p>9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</p>	<p>C</p>	<p>-</p>
<p>9.4.a The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.</p>	<p>C</p>	<p>North Coast Timberlands TCF conducts extensive monitoring to assure that HCVs are maintained and that the management program for HCVFs is effective. For example, TCF has some specific monitoring programs associated with HCVF features, such as EMAP aquatic monitoring on Class 1 streams. The results of HCVF monitoring is recorded in as part of the annual program meeting review.</p> <p>Pennsylvania Properties TCF conducts extensive monitoring to assure that HCVs are maintained and that the management program for HCVFs is effective. Monitoring is conducted during and following all forest operations. The schedule includes monitoring at 3 months following timber harvesting and road construction projects. Additional monitoring is conducted at 1, 3,</p>

		and 5 years following timber harvesting and 1 year following other forest operations.
9.4.b When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.	C	No observed threats have occurred in relation to TCF’s HCV attributes, so this indicator is not applicable.
<p>Principle #10: Plantations shall be planned and managed in accordance with Principles and Criteria 1-9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.</p> <p>Through observation of species composition and management practices, SCS has determined that the FME’s forest management system consists entirely of natural/ semi-natural management.</p>		

Appendix 6 – Chain of Custody Indicators for FMEs Conformance Table

Chain of Custody indicators were not evaluated during this evaluation.

Appendix 7 – Trademark Standard Conformance Table

- N/A, does not use/intend to use FSC trademarks for any purposes (finished with this section); or
- N/A, is fully integrated and all trademark uses are treated under the COC Annex to this report that includes a full review of FSC-STD-40-004 and FSC-STD-50-001.

PART I: General Requirements for Use of the FSC Trademarks

(FSC “checkmark-and-tree” logo, initials “FSC,” and/or name “Forest Stewardship Council”)

Description of how the FME currently uses, or intends to use, FSC trademarks and/or labels, including but not limited to printed materials, Internet applications, on-product labeling, and other public-facing media:	The FME uses the FSC trademark in publicly-facing materials, including on its website, annual reports, and IRMPs.
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<p>1.2 Trademark License Agreement and valid certificate In order to use these FSC trademarks, the FME shall have a valid FSC trademark license agreement and hold a valid certificate. <i>Note: Consultations for certification Organizations applying for forest management certification or conducting activities related to the implementation of controlled wood requirements, may refer to FSC by name and initials for stakeholder consultation.</i></p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs</p>
<p>1.6 Product Group List The products intended to be labeled or promoted as FSC certified have been included in the FME’s certified product group list.</p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs</p>
<p>Section 1.2 and 1.6 Evidence: Reviewed website, 2017 annual report, and a sample of IRMPs. Reviewed product group list.</p>	
<p>1.3 Trademark License Code The FSC trademark license code assigned by FSC to the FME accompanies any use of the FSC trademarks. It is sufficient to show the code once per product or promotional material.</p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs</p>
<p>1.4 Trademark Symbol The FSC logo and the ‘Forests For All Forever’ marks shall include the trademark symbol ® in the upper right corner when used on products or materials to be distributed in a country where the relevant trademark is registered. For use in a country where the trademark is not yet registered, use of the symbol ™ is recommended. The Trademark Registration List document is available in the FSC trade-mark portal and marketing toolkit. The symbol ® shall also be added to ‘FSC’ and ‘Forest Steward-ship Council’ at the first or most prominent use in any text; one use per material is sufficient (e.g. website or brochure). <i>NOTE: The use of the trademark symbol is not required for FSC claims in sales and delivery documents, or for the disclaimer statement specified in requirement 6.2.</i></p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, one or more noted exceptions apply</p>

<p>2.1 Restrictions on using FSC trademarks The FME has not used the FSC trademarks in the following ways:</p> <ul style="list-style-type: none"> a) in a way that could cause confusion, misinterpretation, or loss of credibility to the FSC certification scheme; b) in a way that implies that FSC endorses, participates in, or is responsible for activities performed by the FME, outside the scope of certification; c) to promote product quality aspects not covered by FSC certification; d) in product brand or company names, such as ‘FSC Golden Timber’ or website domain names; e) in connection with FSC controlled wood or controlled material – they shall not be used for labelling products or in any promotion of sales or sourcing of controlled material or FSC controlled wood; the initials FSC shall only be used to pass on FSC controlled wood claims in sales and de-livery documentation, in conformity with FSC chain of custody requirements. 	<table border="1"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> </table>	<input checked="" type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs		
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<p>2.2 Translations The name ‘Forest Stewardship Council’ has not been replaced with a translation. A translation may be included in brackets after the name, for example: Forest Stewardship Council® (translation)</p>	<table border="1"> <tr><td><input type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> <tr><td><input checked="" type="checkbox"/></td><td>N/A, no translations</td></tr> </table>	<input type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs	<input checked="" type="checkbox"/>	N/A, no translations
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<input checked="" type="checkbox"/>	N/A, no translations								
<p>Sections 1.3, 1.4, 2.1, and 2.2 Evidence: Reviewed website, 2018 annual report, and a sample of IRMPs.</p>									
<p>Sections 8 and 9 Graphic Rules The FME has only used FSC logos that conform to the standard requirements governing:</p> <ul style="list-style-type: none"> • color and font (8.1-8.3); • format and size (8.4-8.9); • label placement (8.10); and • ‘Forests For All Forever’ marks (9.1-9.7). 	<table border="1"> <tr><td><input type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> <tr><td><input checked="" type="checkbox"/></td><td>N/A, not using FSC logo</td></tr> </table>	<input type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs	<input checked="" type="checkbox"/>	N/A, not using FSC logo
<input type="checkbox"/>	C								
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<input type="checkbox"/>	C w/Obs								
<input checked="" type="checkbox"/>	N/A, not using FSC logo								
<p>1.5 Trademark Use Approval The FME has submitted all intended uses of the FSC trademarks to SCS for approval. OR The FME has an approved trademark use management system in place. (If the FME has a trademark use management system, complete Annex A.)</p> <p><i>4.6 FSC trademarks may be used to identify FSC-certified materials in the chain of custody before the products are finished. It is not necessary to submit such segregation marks for approval. All segregation marks shall be removed before the products go to the final point of sale or are delivered to uncertified organizations.</i></p>	<table border="1"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> </table>	<input checked="" type="checkbox"/>	C	<input type="checkbox"/>	NC	<input type="checkbox"/>	C w/Obs		
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<p>Sections 1.5 Evidence: Reviewed approvals.</p>									

PART II: On-Product Use of FSC Trademarks

N/A, not using on-product trademarks (skip Part II)

PART III: Promotional Use of FSC Trademarks

N/A, not using promotional trademarks (skip Part III)

<p>6.1 Catalogues, Brochures, and Websites When the FSC trademarks have been used in catalogues, brochures, or websites, the following requirements apply:</p> <ul style="list-style-type: none"> • It is sufficient to present the promotional elements only once in catalogues, brochures, websites, etc. • If both FSC-certified and uncertified products are listed, then a text such as “Look for our FSC®-certified products” shall be used next to the promotional elements and the FSC-certified products shall be clearly identified. • If some or all the products are available as FSC certified on request only, this is clearly stated. 	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, not using trademarks in catalogues/ brochures/websites</p>
<p>6.2 Sales and Delivery Documents When the FSC trademarks are included on sales or delivery document templates that may be used for both FSC and non-FSC products, the following or a similar statement is included: “Only the products that are identified as such on this document are FSC certified”.</p> <p><i>NOTE: Use of the FSC claim and certificate code on invoices does not qualify as FSC trademark use.</i></p>	<p><input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, not using trademarks on templates for FSC & non-FSC products</p>
<p>6.3 Promotional Items All promotional items (e.g., mugs, pens, T-shirts, caps, banners, vehicles, etc.) have displayed, at minimum, the FSC logo and FSC trademark license code.</p>	<p><input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, not labeling promotional items</p>
<p>6.5 Trade Fairs When the FSC trademarks are used for promotion at trade fairs, the FME has:</p> <ol style="list-style-type: none"> a) clearly marked which products are FSC certified, or b) add an add a visible disclaimer stating “Ask for our FSC®-certified products” or similar if no FSC-certified products are displayed. <p><i>NOTE: Use of text to describe the FSC certification of the FME does not require a disclaimer.</i></p>	<p><input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, not using trademarks at trade fairs</p>

<p>Section 6.6 and 6.7 Investment/Financial Claims When investment companies or others are making financial claims based on the FME’s FSC certified operations, the FME has taken full responsibility for the use of the FSC trademarks. Any such claims have been accompanied by the disclaimer, “FSC is not responsible for and does not endorse any financial claims on returns on investments.”</p>	<p><input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, not making financial claims about FSC status</p>
<p>7.1 and 7.2 Other Forestry Certification Scheme Logos The FSC trademarks have not been used together with the marks of other forest certification schemes in a way which implies equivalence, or in a way which is disadvantageous to the FSC trademarks in terms of size or placement.</p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, not using other scheme logos</p>
<p>7.3 Business Cards The FSC trademarks have not used on business cards to promote the FME’s certification. The FSC logo or ‘Forests For All Forever’ marks are not used on business cards for promotion. A text reference to the FME’s FSC certification, with license code, is allowed, for example “We are FSC® certified (FSC® C#####)” or “We sell FSC®-certified products (FSC® C#####)”.</p>	<p><input type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs <input checked="" type="checkbox"/> N/A, approval granted prior to July 1, 2011</p>
<p>7.4 Promotion with CB Logo FSC certified products have not been promoted using only the SCS Kingfisher and/or SCS Global Services logo.</p>	<p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs</p>
<p>Sections 6.1 - 6.3, 6.5-6.7, 7.1-7. 4 Evidence: Reviewed website, 2017 annual report, and a sample of IRMPs. Reviewed sales documents. Interviewed with FME staff.</p>	
<p>Number of trademark uses reviewed and rationale that sample choice is sufficient to confirm requirements are met: Four samples reviewed, one for each type of use.</p>	

Annex A: Trademark use management system

N/A, not using a trademark management system

Annex B. Additional trademark rules for group FM certificate holders

N/A, not a group FM certificate holder or group does not use any FSC trademarks

Appendix 8 – Group Management Program

This is not a group certificate, so this appendix is not applicable.