

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

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*The Conservation Fund*  
*Working Forest Fund and Related Properties*  
United States

**SCS-FM/COC-00102N**

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CERTIFIED	EXPIRATION
21 December 2012	20 December 2017

DATE OF FIELD AUDIT
4 – 6 October 2016
DATE OF LAST UPDATE
11 November 2016

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## Foreword

Cycle in annual surveillance audits			
<input type="checkbox"/> 1 <sup>st</sup> annual audit	<input type="checkbox"/> 2 <sup>nd</sup> annual audit	<input type="checkbox"/> 3 <sup>rd</sup> annual audit	<input checked="" type="checkbox"/> 4 <sup>th</sup> annual audit
Name of Forest Management Enterprise (FME) and abbreviation used in this report:			
The Conservation Fund Working Forest Fund and Related Properties/TCF			

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

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

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

### Organization of the Report

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

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## SECTION A – PUBLIC SUMMARY

### 1. General Information

#### 1.1 Annual Audit Team

<b>Auditor Name:</b>	Dr. Walter R. Mark	<b>Auditor role:</b>	FSC Lead Auditor and SFI Auditor
<b>Qualifications:</b>	<p><b>Dr. Walter R. Mark</b> is a professor emeritus of forestry at California Polytechnic State University, San Luis Obispo and former Director of Swanton Pacific Ranch, the University’s FSC Certified school forest. He has a B.S. in Forest Management from Utah State University, an M.S. in Forest Science from Colorado State University, and a Ph.D. in Botany and Plant Pathology from Colorado State University. Dr. Mark specializes in forest health and silviculture. Dr. Mark is a consultant for SCS and is responsible for the audit. Dr. Mark is a registered professional forester in California (RPF No. 1250) and a Fellow and certified forester with the Society of American Foresters with over 40 years of forestry experience in public and private forestry and higher education sectors. He has served as audit team member and leader in Canada and the USA for certification, recertification, scoping, and annual audits since 2003.</p>		
<b>Auditor Name:</b>	Mike Ferrucci	<b>Auditor role:</b>	FSC Auditor and SFI Lead Auditor
<b>Qualifications:</b>	<p><b>Mike Ferrucci</b> is the SFI Program Manager for NSF – International Strategic Registrations and is responsible for all aspects of the firm’s SFI Certification programs. He is qualified as a RAB-QSA Lead Auditor (ISO 14001 Environmental Management Systems), as an SFI Lead Auditor for Forest Management, Procurement, and Chain of Custody, as an FSC Lead Auditor Forest Management and Chain of Custody, as a Tree Farm Group Certification Lead Auditor, and as a GHG Lead Auditor. Mike has led Sustainable Forest Initiative (SFI) certification and precertification reviews throughout the United States. He has also led or participated in joint SFI and Forest Stewardship Council (FSC) certification projects in nearly one dozen states and a joint scoping or precertification gap-analysis project on tribal lands throughout the United States. He also co-led the pioneering pilot dual evaluation of the Lakeview Stewardship Unit on the Fremont-Winema National Forest.</p> <p>Mike Ferrucci has 33 years of forest management experience. His expertise is in sustainable forest management planning; in certification of forests as sustainably managed; in the application of easements for large-scale working forests, and in the ecology, silviculture, and management of mixed species forests, with an emphasis on regeneration and management of native hardwood species. Mike has conducted or participated in assessments of forest management operations throughout the United States, with field experience in 4 countries and 33 states. Mike has been a member of the Society of American Foresters for over thirty-five years. He is Past Chair of the SFI Auditor’s Forum. Mike is also a Lecturer at the Yale School of Forestry and Environmental Studies, where he has taught graduate courses and workshops in forest management, harvesting operations, professional forest ethics, private forestry, and financial analysis.</p>		

## 1.2 Total Time Spent on Evaluation

A. Number of days spent on-site assessing the applicant:	3.0 Days with 2 auditors in CA, 1.0 Day with one auditor in other
B. Number of auditors participating in on-site evaluation:	2
C. Additional days spent on preparation, stakeholder consultation, and post-site follow-up:	4.0
<b>D. Total number of person days used in evaluation:</b>	<b>13.0</b>

## 1.3 Standards Employed

### 1.3.1. Applicable FSC-Accredited Standards

Title	Version	Date of Finalization
FSC US Forest Management Standard	1.0	July 2010
All standards employed are available on the websites of FSC International ( <a href="http://www.fsc.org">www.fsc.org</a> ), the FSC-US ( <a href="http://www.fscus.org">www.fscus.org</a> ) or the SCS Standards page ( <a href="http://www.scsglobalservices.com/certification-standards-and-program-documents">www.scsglobalservices.com/certification-standards-and-program-documents</a> ). Standards are also available, upon request, from SCS Global Services ( <a href="http://www.SCSglobalServices.com">www.SCSglobalServices.com</a> ).		

## 2 Annual Audit Dates and Activities

### 2.1 Annual Audit Itinerary and Activities

Date: 4 October 2016	
FMU / Location / sites visited	Activities / notes
The Conservation Fund/North Coast Program/Caspar Office/	In attendance were the audit team and TCF staff. Discussion and review included: Introductions, Review of audit plan, existing CARs and OBS, North Coast Policy Digest, Employee Handbook, Harvest Volume History 2007-2015, SYP Option A on file with Cal Fire, various IRMP's, Tax and deed records, Personnel postings, Maps, Olson Gulch THP Documentation, Inventory, FSC international generic standards, final site selection
Various Field Sites/TCF/Big River and Salmon Creek FMU's	<b>STOP 1 – Upper Hazel THP – Salmon Creek FMU</b> This was a selection harvest with 1/3 of the BA removed and tanoak <20" dbh cut. TCF may do a firewood cut program with tanoak on landings. Botanical surveys were conducted in the THP area in 2015 by qualified botanists. NSO sites are located adjacent to the sale area. The THP used single tree selection and demonstrated that NSO habitat was not degraded by the harvesting. Stream crossings were upgraded as part of the harvest with separate 1600 permits with Cal Dept of F&W. TCF has utilized the same licensed timber operator (LTO) on all sales for 2015 and 2016. COC training for contractors was discussed. The sale is a delivered log sale with COC to the mill gate. There is a Jubata

	<p>Grass invasive problem along some of the roads and there is no herbicide use on the FMU, so manual control with volunteers and equipment was discussed.</p> <p><b>Stop 2 – Pre-commercial Thinning – Big River FMU</b> A 2015 pre-commercial thinning (PCT) on a plantation from approximately 2000 was reviewed. There are several of these plantations on the FMU and about 100 acres per year are PCT'd.</p> <p><b>Stop 3 – Feldman Gulch THP – Big River FMU</b> This was a past single tree and group selection harvest. A temporary stream crossing removal was reviewed.</p> <p><b>Stop 4 – Hatch Gulch Bridge – Big River FMU</b> Decking replacement project on older bridge with concrete abutments and log stringers was reviewed.</p> <p><b>Stop 5 – East Branch Little North Fork Habitat Improvement – Big River FMU</b> This was a project to remove a fish barrier from the stream that resulted in a landslide in 2006. The slide originated from a landing from a sale from over 10 years ago. The project was funded through a 60 % matching grant from the Fish Restoration Grant Program (FRGP). Removal of the fish barrier provided an additional 1/2 mile of fish habitat. LWD will be placed in the stream after the new stream channel settles in.</p>
<p><b>Date:</b> 5 October 2016</p>	
<p><b>FMU / Location / sites visited</b></p>	<p><b>Activities / notes</b></p>
<p>Various Field Sites/TCF/Garcia River FMU</p>	<p><b>Stop 6 – Hollow Tree Road THP –Garcia River FMU</b> The focus of this stop was to examine group selection units from 2013 with herbicide control of competing tanoak and planting. All groups for TCF are &lt; 1 acre. This removes any impacts on NSO habitat. Group selection consolidates volume, reduces production costs and improves stocking of conifers. Limited single tree selection occurred between groups. Groups are limited to 20 % of the THP area. Planting stock was from local seed collected in 2009. Seedlings were grown at a nursery in WA. Seedling survival was over 90 % and control of tanoak was excellent. Some natural sugar pine regeneration occurred. The potential impact of a Mendocino County ordinance on standing dead trees was discussed at length. Road upgrades to reduce sediment production were part of the THP</p> <p><b>Stop 7 – Blue Water Hole Creek – Garcia River FMU</b> Coho salmon were just found in the creek as a result of ongoing fish survey work in the streams.</p> <p><b>Stop 8a – Graphite Road Project – Garcia River FMU</b> Through a matching grant from FRGP roads in the Graphite watershed were upgraded to meet 100 year storm criteria, reduce sediment production and decommission roads no longer needed. Stream crossing 1634 and 1630 upgrades were examined. Decommissioning of a section of road with stream crossing 1640 was walked and discussed.</p>

	<p><b>Stop 8b – Alder Retention Stand – Garcia River FMU</b> A large stand of red alder retention along the North Fork Road was discussed.</p> <p><b>Stop 9 – Olson Gulch THP – Garcia River THP</b> This is a 2016 single tree selection harvest which was marked and partially felled. The THP contains part of the ecological reserve, so two different marks were utilized, a 15% BA removal with gaps was utilized on the ecological reserve with a 30% BA removal on the rest of the property. A new NSO site was detected in Unit One of the THP and this was removed from the sale in the spring of 2016.</p>
<p><b>Date:</b> 6 October 2016</p>	
<p><b>FMU / Location / sites visited</b></p>	<p><b>Activities / notes</b></p>
<p>Various Field Sites/TCF-SCI/Buckeye FMU</p>	<p>The Buckeye FMU was purchased in 2013 and the IRMP is not approved at this date. An OBS was issued about the FMP approval in 2015 and is extended in 2016. The purpose of the visit to this FMU was to determine that no resource impacting operations have been done, as is indicated by TCF staff. The day of the visit the Evans Ridge Road was undergoing road work as part of the winterization effort on the FMU.</p>
<p>Closing Meeting/TCF-SCI/Buckeye FMU</p>	<p>The closing meeting was held on the Buckeye FMU with the audit team and TCF staff attending. Preliminary findings were presented to TCF staff by the audit team. What to expect next from the audit and the tentative schedule of events was discussed. Meeting ended at 1430.</p>

## 2.2 Evaluation of Management Systems

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

## 3. Changes in Management Practices

No significant changes have occurred since the recertification in 2012.

## 4. Results of the Evaluation

### 4.1 Existing Corrective Action Requests and Observations

<b>Finding Number: 2015.1</b>	
<b>Select one:</b> <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <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):
<b>FSC Indicator:</b>	SCS CoC Indicators for Forest Management Enterprises 3.2 (see also FSC-STD-50-001 (V1-2), Indicator 1.15 and Annex 1).
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): Examples of the use of Forest Stewardship Council trademarks in various documents were observed during the 2014 annual surveillance audit and again during the 2015 annual surveillance audit on the TCF website without the required registered trademark symbol. Since this was Minor CAR 2014.1, this CAR has been upgraded to Major CAR 2015.1	
<b>Corrective Action Request</b> (or Observation): The appropriate symbol shall be added to “FSC” or “Forest Stewardship Council” for the first use in any text and approval for trademark uses sought from SCS. The registration status of the FSC trademarks for the respective country is listed in Annex 1 of FSC-STD-50-001 (V1-2).	
<b>FME response</b> (including any evidence submitted)	On October 7, 2015 TCF submitted language to SCScertified.com for approval to use the registered trademark on the TCF website. Approval was received from SCS on October 7, 2015. The change was made to the TCF website on October 16, 2015, and can be seen here: <a href="http://www.conservationfund.org/projects/north-coast-forest-conservation-initiative">http://www.conservationfund.org/projects/north-coast-forest-conservation-initiative</a>
<b>SCS review</b>	FME received approval for trademark use from SCS per the records demonstrated. Website was also reviewed for the trademark use, which conforms to FSC requirements.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2015.2</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
<b>FSC Indicator:</b>	FSC-US Forest Management Standard v1.0, 8.5.a
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): A public summary of monitoring results is now available for all FMUs in the scope of the certificate. This is available upon request according to the monitoring guidelines document. An annual summary of monitoring efforts and results for the California properties is published as part of an annual report, but no corresponding summary exists for other the other properties. The methodology for requesting the public summary of the monitoring results is not clear in the monitoring guidelines document posted under the WFF portion of the TCF website.	
<b>Corrective Action Request</b> (or Observation): The methodology for requesting a public summary of the monitoring guidelines should be clarified to make the process as easy and transparent as possible.	
<b>FME response</b> (including any evidence submitted)	<p>TCF has added a link on their website for a request of the monitoring results. In addition the SYP Option A approved by Cal Fire is on line at the Cal Fire website.</p> <p><a href="http://www.conservationfund.org/what-we-do/working-forest-fund/certification">http://www.conservationfund.org/what-we-do/working-forest-fund/certification</a></p> <p><a href="ftp://thp.fire.ca.gov/thplibrary/North_Coast_Region/Option%20As/">ftp://thp.fire.ca.gov/thplibrary/North Coast Region/Option%20As/</a></p> <p>In addition the North Coast Forest Conservation Initiative produces the Caspar Index annually to show the production and the social impact of the program in the local area.</p>
<b>SCS review</b>	The monitoring results are readily available to the public at this time. As a result this observation is closed.
<b>Status of CAR:</b>	<input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2015.3</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input checked="" type="checkbox"/> Other deadline (specify): none
<b>FSC Indicator:</b>	FSC-US Forest Management Standard v1.0, 7.1
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): The Buckeye FMU was acquired in 2013 and a 2 <sup>ND</sup> draft of the management plan has been prepared by TCF and has undergone a first round of review and modification. The draft management plan is in the final review process with the Advisory Committee and Sonoma County. The timeline for the completion of the review is beyond the control of TCF, therefore this item is issued as an observation. While review and final adoption is underway, TCF adopted a policy of no action on the Buckeye FMU. This provides protection to any resources present on the FMU. The resources on the Buckeye FMU are also protected under the general management guidelines in place for all of the TCF WFF FMUs.	
<b>Corrective Action Request</b> (or Observation): TCF should expedite the process of adoption of the management plan for the Buckeye FMU.	

<p><b>FME response</b> <i>(including any evidence submitted)</i></p>	<p>TCF staff have been working with both the advisory committee and Sonoma County in an attempt to get final approval of the IRMP for the Buckeye FMU. Chronology of events since October 2015 regarding the Buckeye Integrated Resource Management Plan to the easement holder; the Sonoma County Agricultural Preservation and Open Space District.</p> <p>September 24, 2015: Second draft of the IRMP submitted by TCF to the County.</p> <p>November 6, 2015: TCF received a response letter from the County with additional items to be inserted in IRMP.</p> <p>December 10, 2015: TCF sent a response letter and updated IRMP.</p> <p>January 26, 2016: The County asked for additional clarification on items and TCF responded.</p> <p>February 2, 2016: TCF and the County have an in-person meeting to come to an agreement regarding the Public Access portion of the IRMP, which is the only outstanding issue.</p> <p>March 11, 2016: Scott Kelly sent an email to the County requesting an update on the status of IRMP approval.</p> <p>April 19, 2016: The County sent a letter to TCF regarding the public access issues. The letter contains the following text regarding approval of the IRMP: This letter follows up on our meeting of February 1, 2016, and your latest version of the draft Buckeye Forest Integrated Resource Management Plan ("IRMP"), which is dated January 26, 2016, and which appendices are dated February 1, 2016. Except in regard to the Recreational Use Plan, we are satisfied that the IRMP meets the requirements of the District's conservation easement ("Easement").</p> <p>April 22, 2016: TCF responded to the letter with an email requesting that TCF and the County enter into a Memorandum of Understanding as a way to move forward with approval of the IRMP while committing to work together on public access.</p> <p>May 9, 2016: TCF sent an email to the County requesting that we move forward on the MOU before TCF has our FSC &amp; SFI certification audits in October.</p> <p>May-August 2016: Negotiations were ongoing with TCF and the County on the language in the MOU.</p> <p>August 19, 2016: A MOU is agreed upon by TCF, the County staff and the CA Coastal Conservancy (a major funder of the purchase of the property).</p> <p>September 1, 2016: TCF received an email that the County: It looks like we'll be bringing the MOU to our Board for its initial consideration in closed session on Oct 18. Final approval of the MOU will need to occur in an open session board action to follow, likely in early November. The reason for this delay is that we need to first meet with department heads from County General Services, Regional Parks, and Transportation &amp; Public Works to discuss Kelly Road as it relates to Soda Springs Reserve.</p>
<p><b>SCS review</b></p>	<p>Since the final approval of the Buckeye FMP is dependent upon outside entities and TCF staff have been diligently working to obtain that final approval, Observation 2015.3 will be extended for up to another year awaiting action by the outside entities that must approve the IRMP. TCF should report the final approval to the CB as soon as that is obtained.</p>
<p><b>Status of CAR:</b></p>	<p><input type="checkbox"/> Closed</p> <p><input type="checkbox"/> Upgraded to Major</p> <p><input checked="" type="checkbox"/> <i>Other decision (refer to description above)</i></p>

## 4.2 New Corrective Action Requests and Observations

<b>Finding Number: 2016.1</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify): none
<b>FSC Indicator:</b>	FSC-US Forest Management Standard v1.0, 7.2.a
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): The Garcia River FMU Management Plan was approved in August 2006. According to the GR-IRMP on page 121 there is a requirement that the plan be updated at least once every ten years. The FSC indicator states that the management plan undergo a “full revision” at least every ten years. Since the plan was approved in August 2006, more than 10 years have elapsed and there is no full revision in place.	
<b>Corrective Action Request</b> (or Observation): TCF must complete and obtain approval for a full revision of the GR-IRMP and submit it for approval. The timing for revision of the other FMU FM Plans should be reviewed and plans made to maintain currency of the management plans.	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2016.2</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify): none
<b>FSC Indicator:</b>	FSC-US Forest Management Standard v1.0, 7.4.a

<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): The FME is required to provide the management plan summaries and monitoring result summaries which are available to the public. The monitoring results have a link on TCF's website for obtaining monitoring results. The four approved IRMP's are available on TCF's website, although navigating to them is not an obvious pathway. The SYP Option A is not available on TCF's website, although it is available on the Cal Fire website.	
<b>Corrective Action Request</b> (or Observation): TCF should provide a more direct path of navigation to the IRMP's and the SYP Option A plan on the Cal Fire website for the public or provide another public summary to fulfill this requirement.	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	
<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above)

<b>Finding Number: 2016.3</b>	
<b>Select one:</b> <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation	
<b>FMU CAR/OBS issued to</b> (when more than one FMU):	
<b>Deadline</b>	<input type="checkbox"/> Pre-condition to certification <input type="checkbox"/> 3 months from Issuance of Final Report <input checked="" type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify): none
<b>FSC Indicator:</b>	FSC-US Forest Management Standard v1.0, 7.3.a and SCS FSC Chain of Custody Indicators for Forest Management Enterprises, Ver. 5-1: 12/03/12, 5.1 and 5.2
<b>Non-Conformity</b> (or Background/ Justification in the case of Observations): The FME must assure that all forest workers are provided with sufficient guidance and supervision to adequately implement their respective components of the plan. During discussions on training provided to contractors, it was determined that the COC training provided to the LTO's is not formally organized, nor is it documented. In addition, since the sales of logs are delivered log sales and the COC must be maintained to the mill gate, the trucking contractor must also receive COC training. The trucking contractor in these cases is a subcontractor of the LTO.	
<b>Corrective Action Request</b> (or Observation): TCF must provide COC training for the LTO and assure that the subcontractors are also provided the necessary training. The FME shall maintain up-to-date records of its COC training and/or communications program, such as a list of trained employees, completed COC trainings, the intended frequency of COC training (i.e. training plan), and related program materials (e.g., presentations, memos, contracts, employee handbooks).	
<b>FME response</b> (including any evidence submitted)	
<b>SCS review</b>	

<b>Status of CAR:</b>	<input type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> <i>Other decision (refer to description above)</i>
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## 5. Stakeholder Comments

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

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

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

### 5.1 Stakeholder Groups Consulted

FME employees	

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

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

<input type="checkbox"/> <i>FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual audit.</i>	
Stakeholder comments	SCS Response
<b>Economic concerns</b>	

<b>Social concerns</b>	
<b>Environmental concerns</b>	
One landowner has expressed concern over the road maintenance taking place on the Buckeye FMU.	The audit team reviewed all the correspondence on this concern and concluded that TCF staff have addressed the concerns and are proceeding with BMP's for road management and winterizing procedures on the road in question.

## 6. Certification Decision

The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual audit team recommends that the certificate be sustained, subject to subsequent annual audits and the FME's response to any open CARs.	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
<b>Comments:</b> TCF continues to practice exemplary sustainable forestry on their FMU's. Their concern for and attention to public input on their management is also exemplary. Of special note are their continued efforts to enhance habitat through road system improvements and habitat improvement projects. They continue to seek and receive substantial grant funds for matching grants. The latest grants have come from the Fisheries Restoration Grant Program.	

## 7. Changes in Certification Scope

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

### Name and Contact Information

<b>Organization name</b>	The Conservation Fund		
<b>Contact person</b>	David Whitehouse and Holly Newberger		
<b>Address</b>	David Whitehouse 410 Market St Suite 360 Chapel Hill NC 27516; 919-951-0118	<b>Telephone</b>	919-951-0118; 707-962-0712
		<b>Fax</b>	866-426-4496
		<b>e-mail</b>	<a href="mailto:hnewberger@conservationfund.org">hnewberger@conservationfund.org</a> <a href="mailto:dwhitehouse@conservationfund.org">dwhitehouse@conservationfund.org</a>
	Holly Newberger 14951 "A" Caspar Road, Box 50 Caspar, CA 95420 United States	<b>Website</b>	<a href="http://www.conservationfund.org">http://www.conservationfund.org</a>

### FSC Sales Information

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

**Scope of Certificate**

<b>Certificate Type</b>	<input type="checkbox"/> Single FMU		<input checked="" type="checkbox"/> Multiple FMU	
	<input type="checkbox"/> Group			
<b>SLIMF (if applicable)</b>	<input type="checkbox"/> Small SLIMF certificate		<input type="checkbox"/> Low intensity SLIMF certificate	
	<input type="checkbox"/> Group SLIMF certificate			
<b># Group Members (if applicable)</b>				
<b>Number of FMUs in scope of certificate</b>	10			
<b>Geographic location of non-SLIMF FMU(s)</b>	<i>Latitude &amp; Longitude: Various in CA, TX, and Eastern US (VT, PA, NH, and ME)</i>			
<b>Forest zone</b>	<input type="checkbox"/> Boreal		<input checked="" type="checkbox"/> Temperate	
	<input type="checkbox"/> Subtropical		<input type="checkbox"/> Tropical	
<b>Total forest area in scope of certificate which is:</b> Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac				
privately managed	109,075			
state managed				
community managed				
<b>Number of FMUs in scope that are:</b>				
less than 100 ha in area	0	100 - 1000 ha in area	10	
1000 - 10 000 ha in area	0	more than 10 000 ha in area	0	
<b>Total forest area in scope of certificate which is included in FMUs that:</b> 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	109,075			
meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs				
<b>Division of FMUs into manageable units:</b>				
Divided among 10 properties in various states				
<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 acres;				
<u>Texas:</u>				
Bobcat Ridge – 7,051 acres;				
<u>Vermont:</u>				
McConnell Pond – 4,500 acres;				

<p><u>Maine:</u> East Grand Lake – 5,947 acres;</p> <p><u>Pennsylvania:</u> Penfield Forest – 2,041 acres;</p> <p><u>Virginia:</u> Chesapeake Forest – 8,600 acres;</p> <p><u>New Hampshire:</u> Success Pond – 8,900 acres</p>
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**Non-SLIMF Group Members**

Name	Contact information	Latitude / longitude of Non-SLIMF FMUs

**Production Forests**

Timber Forest Products	Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac
Total area of production forest (i.e. forest from which timber may be harvested)	97,032
Area of production forest classified as 'plantation'	0
Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems	5,047
Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems	86,985
Silvicultural system(s)	Area under type of management
Even-aged management	12,509
Clearcut (clearcut size range 37.3 acre avg)	
Shelterwood	
Other: Existing plantations from prior owners	12,509
Uneven-aged management	79,523
Individual tree selection Primarily w/ groups scattered	79,523
Group selection	
Other:	
<input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.)	0
The sustainable rate of harvest (usually Annual Allowable Harvest or AAH where available) of commercial timber (m3 of round wood)	CA 8.5 mmbf/yr Others 43,490 tons/yr
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, none are harvested on the FMU's.
Other areas managed for NTFPs or services	0
Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type	0

<b>Explanation of the assumptions and reference to the data source upon which AAH and NTFP harvest rates estimates are based:</b>
Management plans include discussion or documentation with model outputs or other rationale explaining assumptions for Annual Allowable Harvest rates.
<b>Species in scope of joint FM/COC certificate: (Scientific / Latin Name and Common / Trade Name)</b>
<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	W1.1 (Roundwood logs)	All
W3	W3.1 (Woodchips)	<i>Abies balsamea, Acer rubrum, Acer saccharum, Betula alleghaniensis, Betula nigra, Betula papyrifera, Carya spp., Fagus grandifolia, Fraxinus americana, Fraxinus nigra, Larix laricina, Picea glauca, Picea mariana, Picea rubens, Pinus strobus, Populus balsamifera, Populus grandidentata, Populus tremuloides, Prunus serotina, Quercus alba, Quercus rubra, Quercus spp., Thuja occidentalis, Tilia americana, Tsuga canadensis</i>
Non-Timber Forest Products		
Product Level 1	Product Level 2	Product Level 3 and Species
None are harvested.		

**Conservation Areas**

<b>Total area</b> of forest and non-forest land protected from commercial harvesting of timber and managed primarily for conservation objectives:	4,699 ac		
High Conservation Value Forest / Areas			
<b>High Conservation Values present and respective areas:</b> Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac			
Code	HCV Type	Description & Location	Area
<input checked="" type="checkbox"/> HCV1	Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia).	North Coast, CA; Northern Spotted Owl habitat	2,737

<input type="checkbox"/>	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.		
<input checked="" type="checkbox"/>	HCV3	Forests or areas that are in or contain rare, threatened or endangered ecosystems.	North Coast, CA; Oak woodlands and grasslands.	1,195
<input checked="" type="checkbox"/>	HCV4	Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control).	Class I Streams North Coast, CA Bottomland Hardwoods, TX Forested wetlands, NH Forested wetlands, ME	4,162
<input type="checkbox"/>	HCV5	Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health).		
<input type="checkbox"/>	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).		
<b>Total Area of forest classified as 'High Conservation Value Forest / Area'</b>				<b>8,094</b>

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

<input type="checkbox"/> <i>N/A – All forestland owned or managed by the applicant is included in the scope.</i>		
<input checked="" type="checkbox"/> <i>Applicant owns and/or manages other FMUs not under evaluation.</i>		
<input type="checkbox"/> <i>Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification.</i>		
<b>Explanation for exclusion of FMUs and/or excision:</b>	The Conservation Fund is a national organization, with land holdings throughout the United States. The North Coast forests are the only properties owned by TCF in the Western states that support timber harvesting. TCF's other forested properties either: a) are not managed for timber, b) are set to be sold in the near future, or c) are in the process of becoming FSC-certified under a multiple FMU certificate.	
<b>Control measures to prevent mixing of certified and non-certified product (C8.3):</b>	All properties where harvesting occurs use an invoicing system that must state the property of origin.	
<b>Description of FMUs excluded from, or forested area excised from, the scope of certification:</b>		
<b>Name of FMU or Stand</b>	<b>Location (city, state, country)</b>	<b>Size (<input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac)</b>
4 State Forest	NY, VT, NH, ME	30,250 ac
Twin Lakes	Iron County, WI	13,732 ac

Sansavilla	Wayne and Glynn Counties, GA	16,565 ac
Fraser-Reed	Aroostook County, ME	32,341 ac
Brunswick	Brunswick County, GA	3,670 ac
Cranberry Lake	New York	8,162 ac
Kendall	New York	4,638 ac
Logan	West Virginia	32,396

## 8. Annual Data Update

### 8.1 Social Information

Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender):		
# of male workers 97	# of female workers 8	
Number of accidents in forest work since last audit: 1	Serious: # 0	Fatal: #

### 8.2 Annual Summary of Pesticide and Other Chemical Use

<input type="checkbox"/> FME does not use pesticides.				
Commercial name of pesticide / herbicide	Active ingredient	Quantity applied annually (kg or lbs)	Size of area treated during previous year	Reason for use
Arsenal	Imazapyr	4 oz/ac	40.9 ac	Hardwood control, post plant
Oust extra	Sulfometeron methyl + metsulferon methyl	2 oz/ac	40.9 ac	Hardwood control, post plant
Polaris AC	Imazapyr	8 lbs	78 ac	Tanoak reduction
GlyStar	Glyphosate	2 lbs	21 ac	Foliar Veg Mgmt

## SECTION B – APPENDICES (CONFIDENTIAL)

### Appendix 1 – List of FMUs Selected For Evaluation

FME consists of a single FMU

FME consists of multiple FMUs or is a Group

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

FMU Name	FMU Size Category: - SLIMF - non-SLIMF - Large > 10,000 ha	Forest Type: - Plantation - Natural Forest	Rationale for Selection: - Random Sample - Stakeholder issue - Ease of access - Other – please describe
Garcia River Forest – 24,000 acres;	Non - SLIMF	Natural Forest	Activity level , ease of access, rain prior to audit limited access to some areas
Big River and Salmon Creek – 16,000 acres;	Non – SLIMF	Natural Forest	Activity level , ease of access, rain prior to audit limited access to some areas
Buckeye Forest – 18,120 acres	Non – SLIMF	Natural Forest	IRMP has not been approved, needed to confirm no management activities that might threaten resources were undertaken without approved FMP

### Appendix 2 – List of Stakeholders Consulted

#### List of FME Staff Consulted

Name	Title	Contact Information	Consultation method
David Whitehouse	Forest Operations Manager	All TCF staff may be contacted through the directory here, <a href="http://www.conservationfund.org/about-us/staff-list">http://www.conservationfund.org/about-us/staff-list</a>	Email, Personal Interview
Holly Newberger	North Coast Program Coordinator		Email, Personal Interview
Scott Kelly	Timberlands Manager		Personal Interview
Madison Thomson	Forester NC		Personal Interview
Lauren Fety	Forest Analyst		Personal Interview

**List of other Stakeholders Consulted**

Name	Organization	Contact Information	Consultation method	Requests Cert. Notf.
Kirk Zeigler	Neighbor	kirkzeigler@gmail.com	Reviewed emails and record of telephone conversaztions	No

**Appendix 3 – Additional Audit Techniques Employed**

No additional audit techniques were employed.

**Appendix 4 – Pesticide Derogations**

<input checked="" type="checkbox"/> There are no active pesticide derogations for this FME.		
Name of pesticide / herbicide (active ingredient)		Date derogation approved
Condition	Conformance (C / NC)	Evidence of progress

**Appendix 5 – Detailed Observations**

Evaluation Year	FSC P&C Reviewed
2012	All – (Re)certification Evaluation
2013	P 7 & 9 plus obligatory
2014	P6 & 8 plus obligatory
2015	2 & 5 plus obligatory
2016	1, 3, & 4 plus obligatory

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

# FSC Principles Checklist

## FSC Forest Management Standard (v1.0)—United States

REQUIREMENT	C/ NC	COMMENT/CAR
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<p><b>Principle #1: Compliance with Laws and FSC Principles</b>  <b>Forest management shall respect all applicable laws of the country in which they occur, and international treaties and agreements to which the country is a signatory, and comply with all FSC Principles and Criteria.</b></p>		
<p><b>1.1 Forest management shall respect all national and local laws and administrative requirements.</b></p>	C	
<p><b>1.1.a</b> Forest management plans and operations demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and <b>administrative requirements</b> (e.g., regulations). Violations, outstanding complaints or investigations are provided to the <b>Certifying Body (CB)</b> during the annual audit.</p>	C	<p>No violations, complaints or investigations have been received since the last annual audit.</p> <p>Mendocino County has passed a new regulation related to the creation of standing dead trees on private property. The ordinance does indicate 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. TCF has utilized this method to control tanoak as part of their ecological objectives to increase or maintain conifer stocking levels on the property. The FPR's in California require that species composition related to type A species is not decreased through management. Tanoak could be reduced by other methods, but these are much more costly. Future audit teams need to discuss this and review the impact of this ordinance.</p>
<p><b>1.1.b</b> To facilitate legal compliance, the <b>forest owner or manager</b> ensures that employees and contractors, commensurate with their responsibilities, are duly informed about applicable laws and regulations.</p>	C	<p>Contracts for all types of contractors were reviewed during the course of the audit and all include language requiring compliance with all applicable laws at the federal, state and county levels. Employees have appropriate training and licenses to carry out their duties with full compliance to applicable laws.</p>
<p><b>1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid.</b></p>	C	
<p><b>1.2.a</b> The forest owner or manager provides written evidence that all applicable and legally prescribed fees, royalties, taxes and other charges are being paid in a timely manner. If payment is beyond the control of the landowner or manager, then there is evidence that every attempt at payment was made.</p>	C	<p>The tax bills for property taxes and yield taxes and the corresponding payment checks for these for 2015 were examined during the course of the audit. All taxes were paid in full.</p>
<p><b>1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected.</b></p>	C	
<p><b>1.3.a.</b> Forest management plans and operations comply with relevant provisions of all applicable binding international agreements.</p>	C	<p>TCF does not harvest nor sell any products covered under CITES, labor conventions on the FMU comply with ILO Conventions. The management of the FMU's actually includes many projects with the objective of maintaining diversity of species and habitats in accordance with the Convention on Biological Diversity.</p>

<p><b>1.4. Conflicts between laws, regulations and the FSC Principles and Criteria shall be evaluated for the purposes of certification, on a case by case basis, by the certifiers and the involved or affected parties.</b></p>	<p>C</p>	
<p><b>1.4.a.</b> Situations in which compliance with laws or regulations conflicts with compliance with FSC Principles, 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&amp;C, and I were found with laws or regulations pertaining to the forest or its management.</p>
<p><b>1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities.</b></p>	<p>C</p>	
<p><b>1.5. a.</b> The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the <i>Forest Management Unit</i> (FMU).</p>	<p>C</p>	<p>TCF provides protection from illegal and unauthorized activities on the forest by gating most access avenues and keeping the gates locked. They also hire a patrol person to look for illegal access and activities. Some activities, such as hiking are permitted with a written permit. TCF staff and contractors also provide security through their day to day activities on the FMU's. In addition, due to the pervasive nature of illegal marijuana plantations on the FMU's, all of the FMU's in CA were flown with a helicopter to survey for any plantations that might be present. No new plantations were discovered.</p>
<p><b>1.5.b.</b> If illegal or unauthorized activities occur, the forest owner or manager implements actions designed to curtail such activities and correct the situation to the extent possible for meeting all land management objectives with consideration of available resources.</p>	<p>C</p>	<p>The main types of illegal activities include unpermitted access and illegal marijuana growing. The unpermitted access is most often handled by requiring the people to fill out a permit for access. Illegal marijuana growing is handled by reporting and cooperating with the appropriate law enforcement.</p>
<p><b>1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</b></p>	<p>C</p>	
<p><b>1.6.a.</b> The forest owner or manager demonstrates a long-term commitment to adhere to the FSC Principles and Criteria and FSC and FSC-US policies, including the FSC-US Land Sales Policy, and has a publicly available statement of commitment to manage the FMU in conformance with FSC standards and policies.</p>	<p>C</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</p>

		Sustainable Forestry Initiative® (SFI) and/or Forest Stewardship Council® (FSC).” <a href="http://www.conservationfund.org/what-we-do/working-forest-fund/certification">http://www.conservationfund.org/what-we-do/working-forest-fund/certification</a>
<b>1.6.b.</b> If the certificate holder does not certify their entire holdings, then they document, in brief, the reasons for seeking partial certification referencing FSC-POL-20-002 (or subsequent policy revisions), the location of other managed forest units, the natural resources found on the holdings being excluded from certification, and the management activities planned for the holdings being excluded from certification.	C	TCF does not certify all of their holdings. The Conservation Fund is a national organization, with land holdings throughout the United States. The North Coast forests are the only properties owned by TCF in the Western states that support timber harvesting. TCF’s other forested properties either: a) are not managed for timber, b) are set to be sold in the near future, or c) are in the process of becoming FSC-certified under a multiple FMU certificate or d) are included in the FSC Certificate.
<b>1.6.c.</b> The forest owner or manager notifies the Certifying Body of significant changes in ownership and/or significant changes in management planning within 90 days of such change.	C	TCF provides the CB with significant changes when they occur, and TCF plans to notify the CB as soon as the IRMP for the Buckeye FMU is approved. <b>OBS 2015.3</b>
<b>Principle #3: The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected.</b>		
<b>3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies.</b>	NA	
<b>3.1.a</b> Tribal forest management planning and implementation are carried out by authorized tribal representatives in accordance with tribal laws and customs and relevant federal laws.	NA	No indigenous peoples lands are included in the FMU’s managed by TCF.
<b>3.1.b</b> The manager of a tribal forest secures, in writing, informed consent regarding forest management activities from the tribe or individual forest owner prior to commencement of those activities.	NA	No indigenous peoples lands are included in the FMU’s managed by TCF, so no written informed consent is required.
<b>3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples.</b>	C	
<b>3.2.a</b> During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights.	C	TCF contacts the appropriate American Indian groups during management planning to confirm that no harm will come to their resources or rights. In CA under the FPR contact with the appropriate groups is

		a legal requirement that must be met prior to approval of a THP.
<b>3.2.b</b> Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.	C	Protection measures for tribal resources are incorporated into the THP prior to approval. Consultation with the appropriate tribal groups is required and the State archeologist reviews protection measures.
<b>3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.</b>	C	
3.3.a. The forest owner or manager invites consultation with tribal representatives in identifying sites of current or traditional cultural, archeological, ecological, economic or religious significance.	C	Consultation with tribal representatives is required as a part of the THP approval process. This was reviewed during the audit by reviewing the contacts made and the responses from tribal representative for the Olson Gulch THP. CA provides a search capability for significant cultural or historical sites and this search is part of the process for planning of THP's. Other activities such as road improvements and pesticide work are covered, since these take place in areas where THP processes have already occurred.
<b>3.3.b</b> In consultation with tribal representatives, the forest owner or manager develops measures to protect or enhance areas of special significance (see also Criterion 9.1).	C	Protective measures are developed in consultation with the tribal representatives, the State Archeologist or the archeology certified forester and reviewed as part of the THP process.
<b>3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.</b>	C	
<b>3.4.a</b> The forest owner or manager identifies whether <i>traditional knowledge</i> in forest management is being used.	C	No examples of the use of traditional knowledge in forest management were discovered during the 2016 audit.
<b>3.4.b</b> When traditional knowledge is used, written protocols are jointly developed prior to such use and signed by local tribes or tribal members to protect and fairly compensate them for such use.	C	See explanation under 3.4.a.

<p><b>3.4.c</b> The forest owner or manager respects the confidentiality of tribal traditional knowledge and assists in the protection of such knowledge.</p>	<p>C</p>	<p>All of the archeological data and communication is included in a confidential section of the THP and is not available to anyone without a right to access the knowledge and information.</p>
<p><b>Principle #4: Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</b></p>		
<p><b>4.1. The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</b></p>	<p>C</p>	
<p><b>4.1.a</b> Employee compensation and hiring practices meet or exceed the prevailing <i>local</i> norms within the forestry industry.</p>	<p>C</p>	<p>TCF has done some comparisons to other non-profits for compensation packages and they appear to be in the upper end of compensation in benefits overall. These charts for FY 2016/17 were reviewed during the 2016 audit.</p>
<p><b>4.1.b</b> Forest work is offered in ways that create high quality job opportunities for employees.</p>	<p>C</p>	<p>Forest work outside of TCF employees is offered through contracts which are issued following a bid process.</p>
<p>4.1.c Forest workers are provided with fair wages.</p>	<p>C</p>	<p>Forest workers are mostly hired by contractors who are hired through the bid process. They must meet employment standards specified in the contracts.</p>
<p><b>4.1.d</b> Hiring practices and conditions of employment are non-discriminatory and follow applicable federal, state and local regulations.</p>	<p>C</p>	<p>TCF is an equal opportunity employer and all the required labor postings are posted in a prominent place in the Caspar Offices. In 2014 received an award from Minorities and Success for their practices.</p>
<p><b>4.1.e</b> The forest owner or manager provides work opportunities to qualified local applicants and seeks opportunities for purchasing local goods and services of equal price and quality.</p>	<p>C</p>	<p>Local contractors and suppliers are utilized whenever there are qualifies local contractors and suppliers available. The logging and silvicultural contractors in use since the 2015 audit are all local. The botanical surveys are handled by two local botanists under contract.</p>
<p><b>4.1.f</b> Commensurate with the size and scale of operation, the forest owner or manager provides and/or supports learning opportunities to improve public understanding of forests and forest management.</p>	<p>C</p>	<p>TCF has an advisory committee for the North Coast Program and this group and others are provided an opportunity for participation in a field trip to review all planned timber harvests.  TCF has identified social elements as integral to our program and organizes evaluation of potential social impacts/benefits around these elements. Some of the elements and examples of how they are addressed, are:</p>

		<p>Creative arts (eg. College of the Redwoods and Mendocino Art Center photography and painting workshops, elementary school writing and art projects, etc.)</p> <p>Recreational (e.g. interpretive walks, passive recreational access, Boy Scouts and Sierra Club hikes, Audubon trips, etc.)</p> <p>Science/education (e.g. EMAP project, UC Davis research, Humboldt State and other surveys, SONAR projects, PWA workshops, stakeholder tours, etc.)</p> <p>Spiritual (e.g. open space values, Children and Nature programs, Leopold and Thoreau philosophy based programs, and access/utilization by Native tribes)</p>
<p><b>4.1.g</b> The forest owner or manager participates in local economic development and/or civic activities, based on scale of operation and where such opportunities are available.</p>	C	<p>TCF are members of the local community as are their contractors and participate in local development and activities. A good example is their current participation in the Educational Tall Ship program and the donation of logs to support the construction of the ship.</p>
<p><b>4.2. Forest management should meet or exceed all applicable laws and/or regulations covering health and safety of employees and their families.</b></p>	C	
<p><b>4.2.a</b> The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).</p>	C	<p>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. All appropriate documents related to health and safety and worker’s rights are prominently displayed in the Caspar Office.</p>
<p><b>4.2.b</b> The forest owner or manager and their employees and contractors demonstrate a safe work environment. Contracts or other written agreements include safety requirements.</p>	C	<p>Appropriate PPE is utilized by employees and was provided to the audit team as part of the 2016 audit. Contracts require that the contractors provide all the required PPE for the forest work being done. Minimal expectations are listed, but the contract specifies that the specific safety requirements be met by the contractors.</p>
<p><b>4.2.c</b> The forest owner or manager hires well-qualified service providers to safely implement the management plan.</p>	C	<p>All outside service providers are well-qualified to carry out the portions of the management plan they are contracted to complete. For example, all logging in CA is carried out by a CA LTO, herbicide contractors are licensed PCA’s in CA, and the botanical surveys</p>

		are carried out by trained botanists. When pesticide application is handled by TCF staff, a forester who is certified as a QAL is utilized.
<b>4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).</b>	C	
<b>4.3.a</b> Forest workers are free to associate with other workers for the purpose of advocating for their own employment interests.	C	This opportunity is provided and the postings covering this are located in a prominent place in the Caspar Offices.
<b>4.3.b</b> The forest owner or manager has effective and culturally sensitive mechanisms to resolve disputes between workers and management.	C	TCF has an employee manual which covers dispute resolution for employees. This manual was updated in 2016. Disputes for contractors are handled through mechanisms in the contract.
<b>4.4. Management planning and operations shall incorporate the results of evaluations of social impact. Consultations shall be maintained with people and groups (both men and women) directly affected by management operations.</b>	C	
<b>4.4.a</b> The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on: <ul style="list-style-type: none"> <li>• Archeological sites and sites of cultural, historical and community significance (on and off the FMU);</li> <li>• Public resources, including air, water and food (hunting, fishing, collecting);</li> <li>• Aesthetics;</li> <li>• Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health;</li> <li>• Community economic opportunities;</li> <li>• Other people who may be affected by management operations.</li> </ul> A summary is available to the CB.	C	TCF is probably more aware of and considers more completely the potential social impacts of their management impacts on the resources and community than most other forest managers. They have an advisory committee which is actively engaged in planning and review of planned activities. They annually publish the North Coast Forest Conservation Initiative. The latest edition from 2015 was reviewed during the audit. Included in this is the Caspar Index, which includes a number of cultural, environmental, economic, and social activities.
<b>4.4.b</b> The forest owner or manager seeks and considers input in management planning from	C	The THP review process in CA includes a mandatory contact of adjacent landowners and downstream landowners as part of the process. Public review of

<p>people who would likely be affected by management activities.</p>		<p>the SYP and THP's is provided by Cal Fire. Public access to these documents is provided at the Cal Fire website. The Advisory Committee is part of the planning process. Public notices of activities such as herbicide use are posted at least 30 days prior to planned activities and are filed with the County Ag Commissioner.</p>
<p><b>4.4.c</b> People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.</p>	<p>C</p>	<p>See discussion under 4.4..b</p>
<p><b>4.4.d</b> For <b>public forests</b>, consultation shall include the following components:</p> <ol style="list-style-type: none"> <li>1. Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans;</li> <li>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;</li> <li>3. An accessible and affordable appeals process to planning decisions is available.</li> </ol> <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>NA</p>	<p>No public forests are managed by TCF.</p>
<p><b>4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</b></p>	<p>C</p>	
<p><b>4.5.a</b> The forest owner or manager does not engage in negligent activities that cause damage to other people.</p>	<p>C</p>	<p>TCF does not engage in negligent activities that cause damage to other people. No examples or instances of such activities were found during the 2016 annual audit.</p>
<p><b>4.5.b</b> The forest owner or manager provides a known and accessible means for interested</p>	<p>C</p>	<p>TCF provides contact information on their website for anyone who is interested in voicing grievances or</p>

<p>stakeholders to voice grievances and have them resolved. If significant disputes arise related to resolving grievances and/or providing fair compensation, the forest owner or manager follows appropriate dispute resolution procedures. At a minimum, the forest owner or manager maintains open communications, responds to grievances in a timely manner, demonstrates ongoing good faith efforts to resolve the grievances, and maintains records of legal suites and claims.</p>		<p>disputes. TCF maintains a log of all such grievances or disputes and the resolution of those. One such complaint was reviewed during the 2016 audit related to a road dispute on the Buckeye FMU. This complaint was handled by several back-and-forth communications and setting up meetings to resolve the issues. Disputes that were examined were handled without having to provide compensation directly to the complaining person or persons.</p>
<p><b>4.5.c</b> Fair compensation or reasonable mitigation is provided to local people, communities or adjacent landowners for substantiated damage or loss of income caused by the landowner or manager.</p>	<p>C</p>	<p>No cases of substantiated damage or loss of income caused by TCF were discovered during the course of the 2016 audit.</p>
<p><b>Principle #6: Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.</b></p>		
<p><b>6.2 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.</b></p>	<p>C</p>	
<p><b>6.2.a</b> If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present.</p> <p>Surveys are conducted by biologists with the appropriate expertise in the species of interest and with appropriate qualifications to conduct the surveys. If a species is determined to be present, its location should be reported to the manager of the appropriate database.</p>	<p>C</p>	<p>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 botanist working as contractors. NSO surveys are conducted prior to commencement of site disturbing activities by trained NSO survey crews. When new sites are located they are recorded and proper protection is provided to the site. An example of this was observed on the Olson Gulch THP, where a new NSO nest site was located and one entire block was removed from the sale. Another example of the finding of a new location for Coho Salmon in Blue Water Hole Creek was reported from a fish survey</p>

		conducted by a biologist from The Nature Conservancy. The CNDDDB is queried prior to any planned site disturbing activity to provide an indication of known RTE Species in the plan area.
<b>6.2.b</b> When RTE species are present or assumed to be present, modifications in management are made in order to maintain, restore or enhance the extent, quality and viability of the species and their habitats. <b>Conservation zones</b> and/or <b>protected areas</b> are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.	C	Several examples of modifications in management to protect or enhance RTE species were observed during the course of the field audit. These included NSO protection, red alder protection, fisheries habitat enhancement projects, road improvement projects, ecological reserves, HCV management and monitoring, and species composition management.
<b>6.2.c</b> For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as landscape level biodiversity conservation goals.	NA	No public lands are managed by TCF.
<b>6.2.d</b> Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).	C	Access to and use of the FMU's is limited to hiking by permit only and occasionally woodcutting, under the supervision of the patrol person.
<b>6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</b>	C	
<b>6.3.a.</b> Landscape-scale indicators	C	
<b>6.3.a.1</b> The forest owner or manager maintains, enhances, and/or restores under-represented <b>successional</b> 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	C	There are no examples of old growth present on the FMU. There are numerous examples in the area on lands protected to preserve those features. Under-represented types are protected and enhance on the FMU's. Examples include oak trees, red alder trees, grasslands, riparian communities, and species

<p>natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.</p>		<p>composition with regard to conifer and hardwood mix.</p>
<p><b>6.3.a.2</b> When a <i>rare ecological community</i> is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the viability of the community. Based on the vulnerability of the existing community, <i>conservation zones</i> and/or <i>protected areas</i> are established where warranted.</p>	<p>C</p>	<p>Numerous examples of rare ecological community management to maintain, restore or enhance the viability of the community were observed during the field audit. Included were oak retention, red alder retention, grasslands, ecological reserves, RMZ's along fish and non-fish bearing streams, road repairs to reduce impacts including upgrading stream crossing to provide 100-year storm flows, stream restoration to provide additional spawning areas, large woody debris projects in stream to increase habitat, NSO habitat retention and many other examples.</p>
<p><b>6.3.a.3</b> When they are present, management maintains the area, structure, composition, and processes of all <i>Type 1</i> and <i>Type 2 old growth</i>. Type 1 and 2 old growth are also protected and buffered as necessary with conservation zones, unless an alternative plan is developed that provides greater overall protection of old growth values.</p> <p>Type 1 Old Growth is protected from harvesting and road construction. Type 1 old growth is also protected from other timber management activities, except as needed to maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).</p> <p>Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).</p>		<p>No Type I or Type II old growth is present on TCF FMU's.</p>

<p>On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning from below in forest types when and where restoration is appropriate).</p> <p>On American Indian lands, timber harvest may be permitted in Type 1 and Type 2 old growth in recognition of their sovereignty and unique ownership. Timber harvest is permitted in situations where:</p> <ol style="list-style-type: none"> <li>1. Old growth forests comprise a significant portion of the tribal ownership.</li> <li>2. A history of forest stewardship by the tribe exists.</li> <li>3. High Conservation Value Forest attributes are maintained.</li> <li>4. Old-growth structures are maintained.</li> <li>5. Conservation zones representative of old growth stands are established.</li> <li>6. Landscape level considerations are addressed.</li> <li>7. Rare species are protected.</li> </ol>		
<p><b>6.3.b</b> To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.</p>	C	TCF is exemplary in their efforts to maintain, enhance or restore habitat conditions. See the discussion under 6.3.a.2.
<p><b>6.3.c</b> Management maintains, enhances and/or restores the plant and wildlife habitat of <b>Riparian Management Zones (RMZs)</b> to provide:</p> <ol style="list-style-type: none"> <li>a) habitat for aquatic species that breed in surrounding uplands;</li> <li>b) habitat for predominantly terrestrial species that breed in adjacent <b>aquatic habitats</b>;</li> <li>c) habitat for species that use riparian areas for feeding, cover, and travel;</li> </ol>	C	Several examples of projects to maintain, enhance and/or restore the riparian vegetation and the fish and wildlife habitat of RMZ's were reviewed during the field audit. Examples visited included LWD placement to improve habitat, clearing of a landslide from blocking and preventing access to over ½ mile of spawning area along a stream for anadromous fish, the Graphite Road Project to improve stream crossings to accommodate 100 year storm flows,

<p>d) habitat for plant species associated with riparian areas; and, e) stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem.</p>		<p>decommissioning of roads in the Graphite Road Project, Replacement of decking on two bridges to reduce sediment deposition coming through the deck of the bridges, RMZ protection during timber harvesting and herbicide treatment, and retention of shade canopy along streams. Many of these projects were funded through matching fund grants. Two of the came from the FRGP funding.</p>
<p><b>Stand-scale Indicators</b> <b>6.3.d</b> Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p>	<p>C</p>	<p>All of the lands in the FMU's have been harvested at some time in the past and the resulting vegetation is a mix of natural and planted stands. Forest composition is maintained through harvesting of conifer species and control of some types of hardwoods, notably tanoak to maintain the species composition. This is also a requirement of the CA FPR's.</p>
<p><b>6.3.e</b> When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. <b>Native species</b> suited to the site are normally selected for regeneration.</p>	<p>C</p>	<p>Local seed is utilized for all planting projects. The seed was collected from the Jackson State Forest and MRC Gualala Unit in 2009 and maintained in a speed bank. The seedlings were grown under contract in a nursey in WA. Planted species are mainly redwood and Douglas-fir in CA.</p>
<p><b>6.3.f</b> Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include: a) large live trees, live trees with decay or declining health, <b>snags</b>, and well-distributed coarse down and dead woody material. <b>Legacy trees</b> where present are not harvested; and b) vertical and horizontal complexity. Trees selected for <b>retention</b> are generally representative of the dominant species found on the site.</p>	<p>C</p>	<p>The use of single-tree selection and group selection on no more than 20% of the area provides habitat components required for the wildlife species in the area, notably NSO foraging and nesting habitat. 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. Trees retained during harvest are considered future crop trees and are selected for species and health, after the trees to be retained are selected.</p>
<p><b>6.3.g.1</b> In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific</p>	<p>C</p>	<p>Even-aged management is generally limited to plantation management, where those plantations</p>

<p>Coast Regions, when <i>even-aged systems</i> are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit as described in Appendix C for the applicable region.</p> <p>In the Lake States Northeast, Rocky Mountain and Southwest Regions, when even-aged silvicultural systems are employed, and during salvage harvests, live trees and other native vegetation are retained within the harvest unit in a proportion and configuration that is consistent with the characteristic natural disturbance regime unless retention at a lower level is necessary for the purposes of restoration or rehabilitation. See Appendix C for additional regional requirements and guidance.</p>		<p>were in existence when the property was acquired by TCF. Currently the age of these requires Pre-commercial thinning as the management technique.</p>
<p><b>6.3.g.2</b> Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> <li>1. Is developed by qualified experts in ecological and/or related fields (wildlife biology, hydrology, landscape ecology, forestry/silviculture).</li> <li>2. Is based on the totality of the <i>best available information</i> including peer-reviewed science regarding natural disturbance regimes for the FMU.</li> <li>3. Is spatially and temporally explicit and includes maps of proposed openings or areas.</li> <li>4. Demonstrates that the variations will result in equal or greater benefit to wildlife, water quality, and other values compared to the normal opening size limits, including for sensitive and rare species.</li> <li>5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.</li> </ol>	<p>C</p>	<p>No openings larger than the size limits specified have been created. Group openings are limited to &lt;1 acre.</p>

<p><b>6.3.h</b> The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control <i>invasive species</i>, including:</p> <ol style="list-style-type: none"> <li>1. a method to determine the extent of invasive species and the degree of threat to native species and ecosystems;</li> <li>2. implementation of management practices that minimize the risk of invasive establishment, growth, and spread;</li> <li>3. eradication or control of established invasive populations when feasible: and,</li> <li>4. monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.</li> </ol>	<p>C</p>	<p>TCF has an invasive species management plan that includes detection, control and monitoring. The main species of concern are Jubata grass, French broom, bull thistle, and Italian thistle. On the Salmon Creek FMU and the FMU's in VT, no herbicides are utilized. The method of control on these FMU's is mechanical and by hand. A group of local residents volunteers to assist in exotic control on the Salmon Creek FMU.</p>
<p><b>6.3.i</b> In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.</p>	<p>C</p>	<p>Slash management is part of every harvest on the FMU's.</p>
<p><b>Principle #7: A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</b></p>		
<p><b>7.2</b> The management plan shall be periodically revised to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances.</p>	<p>NC</p>	
<p><b>7.2.a</b> The management plan is kept up to date. It is reviewed on an ongoing basis and is updated whenever necessary to incorporate the results of monitoring or new scientific and technical information, as well as to respond to changing environmental, social and economic circumstances. At a minimum, a full revision occurs every 10 years.</p>	<p>NC</p>	<p>During the audit it was determined that the management plan for the Garcia River FMU had not been updated since 2006, The Garcia River FMU Management Plan was approved in August 2006. According to the GR-IRMP on page 121 there is a requirement that the plan be updated at least once every ten years. The FSC indicator states that the management plan undergo a "full revision" at least every ten years. Since the plan was approved in August 2006, more than 10 years have</p>

		<p>elapsed and there is no full revision in place. The FMU was included in the Option A SYP approved; however, the IRMP is more comprehensive and covers areas required in the management plan that are not included in the SYP. CAR 2016.1</p>
<p><b>Principle #8: Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.</b> <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><b>8.5 While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of monitoring indicators, including those listed in Criterion 8.2.</b></p>	<p>C</p>	
<p><b>8.5.a</b> While protecting landowner confidentiality, either full monitoring results or an up-to-date summary of the most recent monitoring information is maintained, covering the Indicators listed in Criterion 8.2, and is available to the public, free or at a nominal price, upon request.</p>	<p>C</p>	<p>A new link to request the monitoring results has been placed on TCF’s website. <a href="http://www.conservationfund.org/what-we-do/working-forest-fund/certification">http://www.conservationfund.org/what-we-do/working-forest-fund/certification</a> The SYP Option A for the California Forest Initiative for four of the 5 FMU’s is posted on the CalFire website. The four approved IRMP’s for the California Forest Conservation Initiative are available on TCF’s website, although navigation to them is not obvious. <b>OBS 2016.2</b></p>
<p><b>Principle #9: Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</b></p> <p><b>High Conservation Value Forests are those that possess one or more of the following attributes:</b></p> <ul style="list-style-type: none"> <li>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</li> <li>b) Forest areas that are in or contain rare, threatened or endangered ecosystems</li> <li>c) Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control)</li> <li>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).</li> </ul> <p><b>Examples of forest areas that <i>may have</i> high conservation value attributes include, but are not limited to:</b> Central Hardwoods:</p>		

- 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><b>9.4 Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</b></p>	<p>C</p>	
<p><b>9.4.a</b> The forest owner or manager monitors, or participates in a program to annually monitor, the</p>	<p>C</p>	<p>TCF conducts extensive monitoring to assure that the HCV attributes are maintained and that the</p>

<p>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>management program for HCV's is effective. If any HCV's are included in a THP, protective buffers or mitigation is included in the THP. Included in the monitoring are botanical surveys anytime a site disturbing action is planned. NSO hooting surveys. Raptor surveys as part of the THP planning process. Fish surveys done by TNC on at least some of the streams in the FMU's. Road assessments done for THP planning to determine if upgrades should be done as part of the THP. Marking of RMZ's for protection during THP preparation. Archeological information requests and surveys by archeology certified forester during THP preparation. Invasive species monitoring to assure that floral resources are not lost due to invasive plant species. Sudden Oak Death management to keep the spread of SOD at a minimum, since SOD is an exotic invasive pest.</p>
<p><b>9.4.b</b> When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.</p>	<p>C</p>	<p>TCF utilizes adaptive management for all of their management objectives and actions. This includes HCV monitoring. To date no increasing risks to HCV's have been observed.</p>

## Appendix 6 – Chain of Custody Indicators for FMEs

Chain of Custody indicators were not evaluated during this annual audit.