

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

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

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| CERTIFIED | EXPIRATION |
|------------------|------------------|
| 21 December 2017 | 20 December 2022 |

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| DATE OF FIELD EVALUATION |
| 5 September, 2-3 October, and 14 December |
| DATE OF LAST UPDATE |
| 10 January 2019 |

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Foreword

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

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

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

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

Organization of the Report

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

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SECTION A – PUBLIC SUMMARY

1. General Information

1.1 Evaluation Team

| | | | |
|------------------------|---|----------------------|--------------|
| Auditor name: | Stefan A. Bergmann | Auditor role: | Lead Auditor |
| Qualifications: | Mr. Bergmann has been in the forestry and wood products field for 15 years, working across the US in forest policy, landowner extension, executive leadership, and forest certification. Prior to joining SCS in July 2017, he worked for Rainforest Alliance, overseeing the Forest Stewardship Council® (FSC®) Forest Management auditing program in the US. He has successfully completed FSC Forest Management Lead Auditor training, ISO 9001 Lead Auditor training, and is qualified to be a team SFI Auditor. He has served as lead and team auditors on numerous FSC FM audits. He holds a BS in Wildlife Science and an MS in Forest Resources, both from Oregon State University, Corvallis, Oregon, USA, and is pursuing an MBA at the University of California Davis. | | |
| Auditor name: | Tucker Watts | Auditor role: | Team Member |
| Qualifications: | Mr. Watts is a partner in Watts Consulting LLC. His primary focus is forest certification through auditing. Since 2008, Watts has been involved with SFI Forest Management, Fiber Sourcing, Certified Sourcing, and Chain of Custody auditing, FSC Forest Management and Chain of Custody auditing, Programme for the Endorsement of Forest Certification Chain of Custody auditing, auditing of the American Tree Farm System's Group certification, auditing of the Responsible Procurement Program of the National Wood Flooring Association and auditing of the Sustainable Biomass Partnership. Watts has 30-year experience in forest management with a large forest products corporation involved in the manufacturing of paper, lumber and plywood. For 10 years, Watts was a system manager for the forest certification system. | | |

1.2 Total Time Spent on Evaluation

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| A. Number of days spent on-site assessing the applicant: | 4 |
| B. Number of auditors participating in on-site evaluation: | 2 |
| C. Number of days spent by any technical experts (in addition to amount in line A): | 0 |
| D. Additional days spent on preparation, stakeholder consultation, and follow-up: | 4 |
| E. Total number of person days used in evaluation: | 12 |

1.3 Standards Used

All standards used are available on the websites of FSC International (www.fsc.org) or SCS Global Services (www.SCSglobalServices.com). All standards are available on request from SCS Global Services via the comment form on our website. When no national standard exists for the country/region, SCS Interim Standards are developed by modifying SCS's Generic Interim Standard to reflect forest management in the region and by incorporating relevant components of any Draft Regional/National Standard and comments from stakeholders. More than one month prior to the start of the field evaluation, SCS Draft Interim Standards are provided to stakeholders identified by FSC International, SCS, forest managers under evaluation, and the FSC National or Regional Office for comment. SCS's COC indicators for FMEs are based on the most current versions of the FSC Chain of Custody Standard, FSC Standard for Group Entities in Forest Management Groups (FSC-STD-30-005), and FSC Accreditation Requirements.

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

2. Certification Evaluation Process

2.1 Evaluation Itinerary, Activities, and Site Notes

| Date: 5 September 2018 (New York property) | |
|--|--|
| FMU / location / sites visited | Activities / notes |
| Audit Opening Meeting FME Office | Introductions, client update, review scope of evaluation, audit plan, intro/update to FSC and SCS standards, confidentiality and public summary, conformance evaluation methods and tools review of open CARs/OBS, emergency and security procedures for evaluation team, final site selection for New York portion of audit. |
| Site 1 (Cranberry Lake FMU): ST-18-1, Irish Brook | 147-acre first-stage shelterwood harvest. Trees to be harvested were marked. Goal was to remove poor quality soft maple and cherry, releasing the yellow birch. Small oil spot on deck from equipment; FME forester stated that he will have the operator address it next week when he returns. Pipe and logs had been used for equipment crossing of wet areas; they have since been removed. Waterbars installed and debris positioned to stabilize soil on trails and deck. Wheat and barley straw has been spread. Wildlife trees marked with 'W' to save. Snags were retained. SMZ on Grasse River is 100 feet above the high-water mark. Most of the buffer is a wetland. SMZ also has a 25' with no equipment buffer. |
| Site 2 (Cranberry Lake FMU): Closed Dump | Adirondack Park requested to investigate closed Olde Town Dump. During review, Japanese knotweed was found on property. The Nature Conservancy (TNC) provided notification for chemical control of invasive species, and FME provided a map to TNC. Adirondack Invasive Plant Program provides funds to TNC to control invasive species. Auditors witnessed spray reports from 2016 and 2017; report includes date, applicator, license number, location (lat/long), herbicide used, application rate, application volume, and invasive species. Auditors also observed recently-sprayed site of a newly-discovered invasives population. Location is marked in The Conservation Fund's GIS database. |
| Site 3 (Cranberry Lake FMU): Boundary Lines | Well-marked property boundaries with red paint and signs posted hunting clubs. Boundaries verified on GIS database. Annual budget |

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| | includes funds for boundary line maintenance. Gates witnessed for control of access. |
| Site 4 (Cranberry Lake FMU): Road Maintenance | Hunting club assisted in widening roads. Internal monitoring identified turnouts that has been incorrectly constructed around Grasse River. Corrective action was taken to redirect drainage of water from road. Witnessed area during field visits. Rock and natural vegetation were used to stabilize area. No sign of erosion. |
| Site 5 (Cranberry Lake FMU): LS-18-1, Dillon Pond | 147-acre first-stage shelterwood harvest. Trees to be harvested were marked. Goal was to remove poor quality soft maple and cherry, releasing the yellow birch. Small oil spot on deck from equipment; FME forester stated that he will have the operator address it next week when he returns. Pipe and logs had been used for equipment crossing of wet areas; they have since been removed. Waterbars installed and debris positioned to stabilize soil on trails and deck. Wheat and barley straw has been spread. Snag and cavity trees retained. Minor skinning on residual trees. Regeneration of maple and birch observed. |
| Closing Meeting, New York | Review preliminary findings for New York portion of audit (potential non-conformities and observations) and discuss next steps. |
| Date: 2 October 2018 (California properties) | |
| FMU / location / sites visited | Activities / notes |
| Opening Meeting, California Casper Field Office | Introductions, client update, review scope of evaluation, audit plan, intro/update to FSC and SCS standards, confidentiality and public summary, conformance evaluation methods and tools review of open CARs/OBS, emergency and security procedures for evaluation team, final site selection for California portion of audit. |
| Site 6 (Big River and Salmon Creek FMU): Two Log Creek Restoration | 2013 LWD stream restoration project with neighboring owner, Mendocino Redwood Company (MRC). Logs placed in stream with rubber-tired skidder to promote formation of pools for a 2.5-mile length of the creek; downstream of each log, pools had been created in the stream substrate. Some logs were intentionally wedged, while others placed to allow for movement with the streamflow. Each log is tagged, and the GPS location, species, size, and movement of each log were monitored by FME annually for the first few years. The project was funded by grants from the California Dept. of Fish & Wildlife (CDFW) and Trout Unlimited to benefit the Coho salmon and steelhead trout. Two Log Creek flows into Big River, which contains salmonid populations of Coho salmon (<i>Oncorhynchus kisutch</i>), chinook salmon (<i>O. tshawytscha</i>), and steelhead trout (<i>O. mykiss</i>)—all listed as endangered or threatened under the federal Endangered Species Act (ESA). |
| Site 7 (Big River and Salmon Creek FMU): Two Log Creek Bridge | 56-foot bridge crossing creek constructed of railroad bed with untreated wood. Bridge is owned by MRC, and FME has an easement to allow for passage to access property. Well-constructed and maintained. No sign of erosion. |

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| <p>Site 8 (Big River and Salmon Creek FMU): Ironing Board THP, Tanoak Control</p> | <p>10-acre tanoak removal. Trees had been felled and stumps sprayed with imazapyr. Spraying occurred on 13 September 2018, and signage remained onsite indicating the area had been treated as observed by auditors. The operation was a 2-person crew with one felling the trees with a chainsaw and the other spraying. Several snags were observed, which had been designated for retention. The primary goal of the treatment was to release fir, but the Forest Practices Act (FPA) requires the ratio of hardwood to softwood remain constant post-harvest. There was discussion about the potential fuel issue of leaving the tanoak on the forest floor.</p> |
| <p>Site 9 (Big River and Salmon Creek FMU): Ironing Board THP, Selection Harvest</p> | <p>Selection harvest included partial removal of tanoak (as opposed to complete removal at Site 13). Treatment focused on removing hardwoods competing with conifers and reducing the amount of hardwoods relative to that of conifers. Merchantable logs had been cable yarded, and corridors were evident. No residual damage noted. Tanoak stumps were treated with herbicide. There was discussion about the benefits to wildlife of the tanoak slash, as well as how chemical treatment is more effective and economical than other means of potentially controlling tanoak.</p> |
| <p>Site 10 (Big River and Salmon Creek FMU): Ironing Board THP, Harvest Road</p> | <p>Access road for THP developed in 2017 for harvesting. The ridgetop road contains rolling dips, water bars, and wide turnouts. Substrate is dirt (no gravel) and too soft to drive on. Minor erosion observed.</p> |
| <p>Site 11 (Big River and Salmon Creek FMU): Ironing Board THP, Selective Cut</p> | <p>Completed commercial thin. Steepness of slope necessitated use of yarding system. Corridors observed; residual trees showed minimal debarking. Goal of harvest was to improve forest health and reduce competition among species by removing white fir, defected, and diseased trees. All redwood was retained. The slope had been planted by the previous landowner, and FME is in the process of converting the stand from an even to an uneven age. This process will take several entries a number of years. There was discussion about management needed to move the stand to an uneven-age structure.</p> |
| <p>Site 12 (Big River and Salmon Creek FMU): Relic Clearcut</p> | <p>30-year old clearcut from previous landowner. Site was replanted in 2017 with redwood and D-fir; survival has been moderate. The regeneration is informally monitored, as stocking levels are not required by the state for planting a on old opening like this. The site has a southerly exposure with little water, so the trees had been planted in the shade of brush. FME plants approximately 60 acres/year of similar open areas. Planting stock for FME is produced from seed collected on the FMU; the Jackson State Demonstration Forest nursery grows the seeds and provides FME with containerized stock for planting.</p> |
| <p>Site 13 (Big River and Salmon Creek FMU): Salmon Creek Road Site 13 (Continued)</p> | <p>On the main haul road, auditors observed culverted crossing which had been replaced on a deeply-incised stream. The incision occurred several years ago during heavy rains. The original metal culvert was replaced with a double-walled 3-foot diameter black</p> |

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| | <p>plastic culvert. Outside of culvert is corrugated; inside is smooth. Culvert was installed correctly with the pitch aligned with the streambed angle. Large piles of metal culverts have accumulated long the roadside; as markets allow, the metal will be removed for salvage. The Salmon Creek watershed had recently had 5 stream crossings removed and sediment control implemented; the local group, Friends of Salmon Creek, was supportive.</p> |
| <p>Site 14 (Big River and Salmon Creek FMU): Dump Site</p> | <p>FMU is gated to control access. At one gate, 3 junk cars had been dumped along with numerous tires. Reports from law enforcement were attached to the vehicles. The process for dealing with illegal activity involves notifying law enforcement. There are 2 security officers that are employed by FME; they will work with law enforcement on any issues that come up, including dump sites like this one. Employees are knowledgeable of the process for handling dumping and other illegal activities and work well with security employees and law enforcement.</p> |
| <p>Site 15 (Big River and Salmon Creek FMU): Carbon Plot</p> | <p>1/10-acre fixed point carbon plot next to Salmon Creek. Permanent plots have been established for development of carbon credits. The center of each plot is identified by a permanent tag (observed in field by auditors) with GIS location, date, and identification number. Inventory is conducted on a 10-year cycle. 1,500 to 2,000 plots have been established across the FME properties on the North Coast. During carbon inventories, woody material is counted in three consecutive rings around the plot center in accordance with the California Air Resources Board (CARB) protocol.</p> |
| <p>Site 16 (Big River and Salmon Creek FMU): WLPZ area</p> | <p>Second growth redwood forest stand in WLPZ area along stream. Overstory comprised of very large redwood. Forest floor contains several large stumps from the removal of the primary forest during historic logging; a nearby old railroad bed, now overgrown, had been used historically to log the stand. This WLPZ is protected from any harvest by FME.</p> |
| <p>Site 17 (Big River and Salmon Creek FMU): Pygmy Forest</p> | <p>4-acre example of pygmy forest; the ecotype is designated as HCV by FME. Tree growth is stunted due to poor site and growing conditions; soil is rocky and thin. Area is protected from active management.</p> |
| <p>Date: 3 October 2018 (California properties)</p> | |
| <p>FMU / location / sites visited Activities / notes</p> | |
| <p>Site 18 (Garcia River FMU): Fish Rock THP, Group Selection Active Operation</p> | <p>Witnessed and discussed active timber harvesting operation and guidelines along Fish Rock Road. In NSO area, group selection areas are no more than 1-acre in size. Twenty percent of the total harvest area can be up to 2.5 acres in size with 200 feet between each group opening. Single tree selection along road in unit. Tanoak is removed to promote conifer regeneration. Group openings will be planted with D-fir and redwood containerized seedlings. Slash and debris used to stabilize slopes, retain moisture for regeneration, protect against deer browsing of seedlings, and</p> |
| <p>Site 18 (Continued)</p> | |

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| | reduce establishment of grasses. Interviewed supervisor of active operation, who is a faller; he is an employee of the LTO (not a contractor, as is typically the case). Crew is well trained and wore appropriate PPE. |
| Site 19 (Garcia River FMU): Fish Rock THP, Group Selection Active Operation, Rare Plant Protected Area | Approximately 25-foot in diameter protected area flagged by RPF for the rare white flowered rein orchid (<i>Piperia candida</i>). No harvesting is to occur in the protection area, which occurs along the haul road. The plant is designated as rare by the California Native Plant Society. |
| Site 20 (Garcia River FMU): Fish Rock THP, Group Selection Active Operation, WLPZ Area | Class 2 WLPZ buffered with flagging. Some trees marked inside zone. Per state law, 50% of canopy must be retained for harvesting in a Class 2 WLPZ. Trees must be directionally felled away from creek. The goal is to retain adequate shading and not alter of hydrology. |
| Site 21 (Gualala River FMU): New Water Crossing | Along Fish Creek Road, FME is in final stages of improving a water crossing. The crossing occurs at the junction of a Class 2 stream and Class 3 stream. For the Class 2 stream, a ditch on the hillside of the road was constructed, draining to a galvanized metal culvert. A downspout will be installed at the outlet of the culvert to minimize erosion in the stream. Steep banks below the road and culvert have been armored with rock. For the Class 3 stream, a low water crossing was constructed with larger substrate below road level capped with gravel. Road in the vicinity is rocked with various sizes of rock and gravel. No evidence of erosion. |
| Site 22 (Gualala River FMU): Pond | Small spring-fed pond located roadside. Biologist who was conducting surveys for FME stated that the pond is ideal habitat for the California red-legged frog (<i>Rana draytonii</i>), although the species has not been seen there. The species is listed as threatened under the federal ESA. Water from the spring feeding the pond is diverted for drafting as needed. |
| Closing Meeting, California | Review preliminary findings for California portion of audit (potential non-conformities and observations) and discuss next steps. |
| Date: 14 December 2018 (Maine property) | |
| FMU / location / sites visited | Activities / notes |
| Opening Meeting, Maine FME Office, Prentiss & Carlisle | Introductions, client update, review scope of evaluation, audit plan, intro/update to FSC and SCS standards, confidentiality and public summary, conformance evaluation methods and tools review of open CARs/OBS, emergency and security procedures for evaluation team, final site selection for Maine portion of audit. |
| Site 23 (Reed Plantation FMU): FME Office | Discussed organization and operation of Reed Plantation, including: <ul style="list-style-type: none"> • Existing supply agreement for spruce/fir • AAC calculation • Protection of special sites, HCVF, and T&E species • Maps and GIS • Public recreational use of area |
| Site 23 (Continued) | |

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| | <ul style="list-style-type: none"> • Monitoring for invasive species; applicator license and chemical use log witnessed • Operation of conservation easement • Witnessed contracts for harvesting and road maintenance • Forest product markets • Communication with contractors • Installation of fish passage culverts • Planning for spruce budworm |
| Site 24 (Reed Plantation FMU): Timber Sale | 125-acre shelterwood harvest. Equipment is onsite to plow roads for winter harvest. Plan includes wildlife considerations and LUPC zones for Prouty Brook. Witnessed flagging of SMZ no equipment buffer. Witnessed pre-harvest conference checklists for 7 tracts. Skid trails were placed parallel to the roads to minimize negative aesthetic impacts. Also buffered around adjacent houses. Debris will be scattered on trails. |
| Closing Meeting, Maine* | Review preliminary findings for Maine portion of audit (potential non-conformities and observations) and discuss next steps. |

* There was no formal closing meeting for the full audit. There was only one finding from the audit, which was closed during the audit process. Additionally, closing meetings has been held for each of the three FMUs evaluated.

2.2 Evaluation of Management Systems

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

3. Changes in Management Practices

There were no significant changes in the management and/or harvesting methods that affect the FME’s conformance to the FSC standards and policies.

Significant changes occurred since the last evaluation that may affect the FME’s conformance to FSC standards and policies (*describe*):

4. Results of Evaluation

4.1 Definitions of Major CARs, Minor CARs and Observations

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

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

Observations: These are subject areas where the evaluation team concludes that there is conformance, but either future nonconformance may result due to inaction or the FME could achieve exemplary status through further refinement. Action on observations is voluntary and does not affect the maintenance of the certificate. However, observations can become CARs if performance with respect to the indicator(s) triggering the observation falls into nonconformance.

4.2 History of Findings for Certificate Period

| FM Principle | Cert/Re-cert Evaluation 2017 | 1 st Annual Evaluation 2018 | 2 nd Annual Evaluation 2019 | 3 rd Annual Evaluation 2020 | 4 th Annual Evaluation 2021 |
|--------------|--|--|--|--|--|
| No findings | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| P1 | | | | | |
| P2 | | | | | |
| P3 | OBS 2017.6 (3.3.a) | | | | |
| P4 | | | | | |
| P5 | OBS 2017.1 (5.3.b) | | | | |
| P6 | OBS 2017.2 (6.5.d); Minor CAR 2017.3 (6.4.d); OBS 2017.1 (6.5.d) | | | | |
| P7 | | | | | |
| P8 | | | | | |
| P9 | | | | | |
| P10 | | | | | |

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|--------------|--|----------------------------|--|--|--|
| COC for FMEs | Minor CAR 2017.5 (3.1, 3.2, and 3.3) | | | | |
| Trademark | Minor CAR 2017.5 (1.15 and 1.16) | Major CAR 2018.1 (1.15) | | | |
| Group | NA | | | | |
| Other | NA | | | | |

4.3 Existing Corrective Action Requests and Observations

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| Finding Number: 2017.1 | |
| Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation | |
| FMU CAR/OBS issued to (when more than one FMU): North Coast (California) | |
| Deadline | <input type="checkbox"/> Pre-condition to certification <input 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 |
| FSC Indicator: | FSC-US Forest Management Standard v1.0, Indicator 5.3.b |
| Non-Conformity (or Background/ Justification in the case of Observations): Residual damage was observed by auditors in Stand 5 of the Ironing Board THP, a closed-out harvest on the Big River Forest, near milepost 4. The damage was greatest along a cable-yarding corridor. Staff explained that this resulted from insufficient deflection to keep the logs off of the ground by the logging contractor. Bark damage was significant to the extent that the health and growth of damaged trees was noticeably affected. Since this condition was detected at only one location and therefore appears to be an isolated event, an OBS and not a CAR is appropriate. | |
| Corrective Action Request (or Observation): The FME should ensure that harvest practices are managed to protect residual trees and other forest resources, including residual trees not being significantly damaged to the extent that health, growth, or values are noticeably affected. | |
| FME response (including any evidence submitted) | TCF has instructed our logging contractors to use care in selective harvests and employ damage prevention measures such as designating “rub” trees to be harvested after skidding is done thereby leaving a clean stand upon completion. |
| SCS review | No significant residual damage was noted at harvest sites in 2018 on the North Coast, Cranberry Lake, nor Reed Plantation FMUs. The damage observed in 2017 appears to have been an isolated situation and not indicative of a systemic problem. |
| Status of CAR: | <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above) |

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| Finding Number: 2017.2 | |
| Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation | |
| FMU CAR/OBS issued to (when more than one FMU): North Coast (California) | |
| Deadline | <input type="checkbox"/> Pre-condition to certification <input 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 |
| FSC Indicator: | FSC-US Forest Management Standard v1.0, Indicator 6.5.d |
| Non-Conformity (or Background/ Justification in the case of Observations): Two of three culverted crossings examined along Olsen Gulch Road in the Garcia River Forest had “bed load” sediment build-up behind the trash racks at the upstream inlets. Additionally, staff acknowledged that trash racks had not been installed correctly. Water passage through the culverts was not significantly impeded; however, the build-up of material presents a potential source of sediment discharge into the streams and further contributes to the ability for the culverts to efficiently move water, particularly in high-volume storm events. | |
| Corrective Action Request (or Observation): The FME’s transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, should be designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, soil and water disturbance and cumulative adverse effects and include measures to minimize sediment discharge to streams. | |
| FME response (including any evidence submitted) | <p>TCF’s transportation system is being systematically upgraded to the highest industry standard developed by Pacific Watershed and Associates, whose road construction practices have been published in “The Handbook of Forest and Ranch Roads”. TCF’s Road Management Plan, including our Erosion Control Plan and Site-Specific Management Plan, are in conformance with the Garcia River TMDL and the Garcia River Action Plan and have been approved by the California State Water Quality Control Board.</p> <p>Our staff regularly checks culverts during winter storm events to ensure they are not plugged and working correctly.</p> |
| SCS review | Site visits confirmed that TCF’s transportation system is in excellent shape, including culverted crossings. All culverts observed were in good working order with no bed load sediment. Water crossings and landings reviewed were designed, constructed, and maintained to reduce short and long-term environmental impacts, soil and water disturbance, and cumulative adverse effects and include measures to minimize sediment discharge to streams (see notes for Sites 12, 18, and 26). |
| Status of CAR: | <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above) |

| | |
|--|---|
| Finding Number: 2017.3 | |
| Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation | |
| FMU CAR/OBS issued to (when more than one FMU): North Coast (California) | |
| Deadline | <input type="checkbox"/> Pre-condition to certification <input 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 |
| FSC Indicator: | FSC-US Forest Management Standard v1.0, Indicator 6.4.d |
| <p>Non-Conformity (or Background/ Justification in the case of Observations):</p> <p>The FME has developed most of its program on the basis of regional ecologically-focused assessments and plans. <i>Conservation Prospects for the North Coast: A Review and Analysis of Existing Conservation Plans, Land Use Trends and Strategies for Conservation on the North Coast of California</i>, prepared by the FME in August 2005, provides a collection and synthesis of conservation plans in the North Coast.</p> <p>Based on this and other work, the FME has concluded that because of the widespread protected nature of lands in the region, the regulatory system restricting land use change and harvest practices, and the existing pattern of habitat conditions and ecological processes present on the landscape, designating RSAs on their property is unnecessary and would not be ecologically beneficial (see policy document, <i>The Conservation Fund North Coast Forest Conservation Program Policy Digest</i>; July 2017 version). The FME further concludes that HCvFs on their properties protect the ecological values that RSAs supply.</p> <p>In the <i>North Coast Forest Conservation Program Policy Digest</i>, the FME commits to re-evaluating its decision on RSAs at least every 10 years, with stakeholder input, as part of planned updates to its management policies. The FME’s forestry staff confirmed that no such re-evaluation of its RSA policy has been conducted since the August 2005 collection and synthesis of all of North Coast conservation plans, and thus the re-evaluation is overdue.</p> | |
| <p>Corrective Action Request (or Observation):</p> <p>The FME shall ensure that the RSA assessment (Indicator 6.4.a) is reviewed at a minimum once every 10 years in order to determine if the need for RSAs has changed. Designation of RSAs (Indicator 6.4.b) must be revised as a result of this review, as necessary.</p> | |
| FME response (including any evidence submitted) | TCF did an updated RSA assessment, and updated the Policy Digest to reflect this updated review. TCF did not find any change in the designation of RSAs. |
| SCS review | The updated document, <i>Program on High Conservation Value Forests, Imperiled Species, and Representative Sample Areas</i> , describes the RSA assessment conducted in 2018. Following this review of regional conservation plans, TCF maintains its previous position that because of the widespread protected nature of the region, the extensive regulatory system restricting land use change and harvest practices, and the existing pattern of habitat conditions and ecological processes present on the landscape, the designation of additional RSAs is unnecessary and would not be ecologically beneficial. |
| Status of CAR: | <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above) |

| | |
|---|--|
| Finding Number: 2017.4 | |
| Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation | |
| FMU CAR/OBS issued to (when more than one FMU): North Coast (California) | |
| Deadline | <input type="checkbox"/> Pre-condition to certification <input 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 |
| FSC Indicator: | FSC-US Forest Management Standard v1.0, Indicators 1.1.a and 6.5.d |
| Non-Conformity (or Background/ Justification in the case of Observations): | |
| <p>The roads appurtenant to the active harvest on the Olsen Gulch THP in the Garcia River Forest on the day the auditors reviewed them had a deep layer of fine, dusty silt powder that was being stirred up by trucks using the road. Water availability limited the extent of the road that could be watered each evening, but dust levels were at problematic levels. The Timberlands Manager for the FME was concerned enough to be exploring options with the LTO to remedy the problem.</p> <p>The California Practice Rules (version 2017) requires in that use and maintenance of logging roads occur in a manner that avoids or substantially lessens significant adverse impacts to water quality and the beneficial uses of water, soil resources, and air quality (see Article 12. [Article 11. Northern] Logging Roads, Landings, and Logging Road Watercourse Crossings; Sec. 923, 943, 963 (b) Intent for Logging Roads, Landings, and Logging Road Watercourse Crossings. [All Districts]). Dust conditions on the Olsen Gulch THP roads being actively used by the LTO may be at risk of approaching these legal limits.</p> | |
| Corrective Action Request (or Observation): | |
| <p>The FME’s forest management plans and operations must demonstrate compliance with all applicable federal, state, county, municipal, and tribal laws, and administrative requirements such as regulations (Indicator 1.1.a). Likewise, the FME’s transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, should be designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, soil and water disturbance and cumulative adverse effects and include measures to minimize ecological impacts, erosion, and sediment discharge into streams (Indicator 6.5.d).</p> | |
| FME response (including any evidence submitted) | <p>TCF’s road construction and maintenance practices are to the highest standard as explained in 2017.2 above. Water availability for dust control in California’s anadromous fish-bearing watersheds is restricted by California Department of Fish and Wildlife permitting and mitigation requirements. In most cases we have converted to the use of Dust Off for soil stabilization which requires limited water prior to application. Where possible, we have water tanks “drafting” from non-fish bearing streams or we have dug water wells powered by generator or solar panels. We are taking proactive measures on all our properties to reduce watershed impacts, while securing adequate water for dust control.</p> |
| SCS review | <p>Site visits confirmed that TCF’s transportation system is in excellent shape, including the implementation of dust control practices. Roads evaluated and travelled during the audit had Dust Off and/or water applied to control dust, as necessary. No issues were observed.</p> |

| | |
|-----------------------|--|
| Status of CAR: | <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above) |
|-----------------------|--|

| | |
|--|--|
| Finding Number: 2017.5 | |
| Select one: <input type="checkbox"/> Major CAR <input checked="" type="checkbox"/> Minor CAR <input type="checkbox"/> Observation | |
| FMU CAR/OBS issued to (when more than one FMU): North Coast (California) | |
| Deadline | <input type="checkbox"/> Pre-condition to certification <input 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 |
| FSC Indicator: | FSC Trademark Standard (FSC-STD-50-001), Indicators 1.15 and 1.16 |
| Non-Conformity (or Background/ Justification in the case of Observations): The FME is using the FSC trademark in publicly-facing materials, including on its website, annual reports, and IRMPs. It has approval for use of the trademark on the website and their annual reports. However, on the website for the Working Forest Fund (https://www.conservationfund.org/our-work/working-forest-fund/certification), the acronym “FSC” is missing a trademark symbol. Additionally, FSC trademarks in the Garcia River IRMP lack the trademark symbols; there is also no record of approval of the use of trademarks for the Garcia River IRMP. | |
| Corrective Action Request (or Observation): The use of the trademark symbol ® (in superscript font) must accompany the first use of “FSC” and “Forest Stewardship Council” in any text (Indicator 1.15). All FSC trademark uses must be submitted to SCS for approval (Indicator 1.16). | |
| FME response (including any evidence submitted) | The website has been updated to include the use of the trademark symbol. https://www.conservationfund.org/our-work/working-forest-fund/certification The Garcia River IRMP has been updated to include the trademark symbol on page 2. https://www.conservationfund.org/images/projects/files/GRF_IRMP_3.27.18_w_Appendix.pdf The North Coast Annual Review includes the trademark symbol. https://www.conservationfund.org/images/2017_North_Coast_5.7.18.pdf Screenshots of two separate SCS approvals were provided to auditors. |
| SCS review | Auditors have verified that the FSC trademark is being correctly used on the updated Garcia River IRMP and North Coast Annual Review and that approval from SCS was secured. However, the acronym “FSC” is missing a trademark symbol on the website for the Working Forest Fund (https://www.conservationfund.org/our-work/working-forest-fund/certification). The finding has been upgraded to a Major CAR. |
| Status of CAR: | <input type="checkbox"/> Closed <input checked="" type="checkbox"/> Upgraded to Major – See Finding 2018.1 . <input type="checkbox"/> Other decision (refer to description above) |

| | |
|---|---|
| Finding Number: 2017.6 | |
| Select one: <input type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input checked="" type="checkbox"/> Observation | |
| FMU CAR/OBS issued to (when more than one FMU): Success Pond (New Hampshire) | |
| Deadline | <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 |
| FSC Indicator: | FSC-US Forest Management Standard v1.0, Indicator 3.3.a |
| Non-Conformity (or Background/ Justification in the case of Observations): The "Multiple Resource Management Plan" for Success Pond Tract identifies four communities of indigenous people in the Success Pond area. TCF has conducted outreach to two of the communities of indigenous people (currently, there are no federally-recognized tribes in New Hampshire), however there is an opportunity to improve outreach to other locally recognized indigenous groups referenced in the management plan. | |
| Corrective Action Request (or Observation): The forest manager could include the other two communities of indigenous people in their consultation to identify sites of current or traditional cultural, archeological, ecological, economic, or religious significance. | |
| FME response (including any evidence submitted) | Two letters were sent on March 17, 2017 to the Abenaki Nation and Pennacook New Hampshire Tribe. |
| SCS review | Copies of the letters sent to the Abenaki Nation and Pennacook New Hampshire Tribe were reviewed by auditors. The letters invited input. |
| Status of CAR: | <input checked="" type="checkbox"/> Closed <input type="checkbox"/> Upgraded to Major <input type="checkbox"/> Other decision (refer to description above) |

4.4 New Corrective Action Requests and Observations

| | |
|---|---|
| Finding Number: 2018.1 | |
| Select one: <input checked="" type="checkbox"/> Major CAR <input type="checkbox"/> Minor CAR <input type="checkbox"/> Observation | |
| FMU CAR/OBS issued to (when more than one FMU): North Coast (California) | |
| Deadline | <input type="checkbox"/> Pre-condition to certification <input checked="" type="checkbox"/> 3 months from Issuance of Final Report <input type="checkbox"/> Next audit (surveillance or re-evaluation) <input type="checkbox"/> Other deadline (specify): none |
| FSC Indicator: | FSC Trademark Standard (FSC-STD-50-001), Indicators 1.15 |
| Non-Conformity (or Background/ Justification in the case of Observations): On the website for the Working Forest Fund (https://www.conservationfund.org/our-work/working-forest-fund/certification), the acronym "FSC" is missing a trademark symbol. | |

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

5. Stakeholder Comments

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

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

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

5.1 Stakeholder Groups Consulted

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

5.2 Summary of Stakeholder Comments and Evaluation Team Responses

The table below summarizes the major comments received from stakeholders and the assessment team’s response. Where a stakeholder comment has triggered a subsequent investigation during the evaluation, the corresponding follow-up action and conclusions from SCS are noted below.

| <input type="checkbox"/> <i>FME has not received any stakeholder comments from interested parties as a result of stakeholder outreach activities during this annual evaluation.</i> | |
|--|---|
| Stakeholder Comment | SCS Response |
| <p>In reviewing TCF’s inventory data on the North Coast, their objective of harvesting at a rate far below growth is showing a measurable rate of overall inventory growth (which is good). However, the low inventory in the problem areas will take many years to recover to meet the FME’s target levels.</p> | <p>Per FM Indicator 5.6.a, TCF’s rate of harvest is below that of growth, which is increasing total inventory on its FMUs. FME is aware that previous landowners on the North Coast had heavily cut some areas, resulting in a prevalence of tanoak; forest management the FME undertakes in these areas aims to reduce the hardwood component and increase stocking and inventory of redwoods.</p> |
| <p>TCF does an exemplary job of road management and monitoring impacts of those roads (temperature, sediment, biologic factors, etc.).</p> | <p>Per FM Indicator 6.5.d, TCF’s transportation system on its FMUs is in good to excellent condition. Per FM Indicator 8.2.d.2, TCF regularly monitors the impact of its transportation system on the environmental values that this stakeholder notes.</p> |
| <p>TCF is respecting the Mendocino County Ordinance by not leaving standing dead or dying trees that have been treated.</p> | <p>Adhering to the county ordinance demonstrates evidence of conformance with FM Indicator 1.1.a, which pertains to compliance with all applicable federal, state, county, municipal, and tribal laws, and administrative requirements. Auditors note this as evidence of conformance under 1.1.a.</p> |
| <p>I have personally toured TCF’s property and have found it to be managed in a way that benefits wildlife with the long-term restoration goal of improving the structural diversity of the forest. I have not found any issues with how TCF manages their property. I consider the organization a strong stewardship partner that is actively working to improve the land they own.</p> | <p>TCF demonstrates conformance with environmentally-related FM indicators, including 6.3.f that pertains to maintaining, enhancing, and restoring habitat components and associated stand structures such as vertical and horizontal complexity. Large live trees, legacy trees, and snags are maintained across the landscape on its FMUs, as confirmed by auditor site visits.</p> |
| <p>TCF is probably the best example of an organization taking in and actively seeking out public input.</p> | <p>TCF actively consults with external stakeholders (per FM Indicator 2.2.b), including American Indians (per FM Indicators 3.2.a and 3.3.a) and others impacted (per FM Indicator 4.4.a).</p> |
| <p>On the North Coast, TCF stands out in that they have really shown an interest in NSO surveys. The organization took a proactive approach to NSO, even conducting more surveys than what is required for THPs. No concerns at all. Can’t say enough good stuff about TCF.</p> | <p>Per FM Indicator 6.2.a, for the North Coast FMUs, the state natural heritage database is reviewed by TCF as part of the THP process; any listed species are assumed to be present. Prior to the commencement of any planned site-disturbing</p> |

| | |
|--|---|
| | activity, surveys are conducted to determine the presence of any RTE species. |
| They have been receptive to a lot of suggestions including stuff that goes above and beyond what's required. They have more of a holistic, long term approach to the work. Really a pleasure to be able to work with an organization like them. | This comment is consistent with other comments received through other internal and external interviews, observations in the field, and other data collected by auditors. |
| My experience with the organization has been completely positive. I think their approach to forest management is exceptional and their mission is laudable. I'm a huge fan. | This comment is consistent with other comments received through other internal and external interviews, observations in the field, and other data collected by auditors. |
| Their forester on the North Coast one of the best out there. I don't see any that good in the area. He really works hard at making things work and is experimenting with different treatment applications. | This comment is consistent with other comments received through other internal and external interviews, observations in the field, and other data collected by auditors. |
| Can't say enough good things about their forester on the North Coast. We have left the regulatory part of the process to him, which has been great. He has knowledge at every step of the process, including calling for NSOs and working with regulatory agencies. | Forester on North Coast conveyed a thorough understanding of the regulatory process, demonstrating compliance with Indicator 1.1.b. However, this indicator was not evaluated this year. |
| They are a very good client. They consistently have work, which is important. They know what they want. Projects tend to be well designed. They also pay competitively. Visit active operations regularly. Nothing but good comments about everything that involved with at TCF. | This comment is consistent with other comments received through other internal and external interviews, observations in the field, and other data collected by auditors. |
| TCF's mission of keeping forestland in large tracts without subdivision is critical. | Noted as positive evidence of conformance under FM Indicator 6.10.a. |
| On the North Coast, TCF maintains or recruits a significant component of large old trees, both conifer and hardwood, within each planning sub-watershed, including trees that are allowed to continue to grow unharvested. | Per FM Indicator 6.3.f, large live trees, legacy trees, and snags are maintained across the landscape on the three FMUs sampled this year, as confirmed by auditors. |
| TCF limits the use of herbicides on the North Coast to the bare minimum necessary, using manual thinning where at all possible. | This comment suggests compliance with FM Criterion 6.6. Auditors note this as evidence of conformance under Criterion 6.6. |
| TCF provides a strong program for the protection and enhancement of habitat for state and federal T&E species, both plant and animal. | Per FM Indicator 6.2.a, for the North Coast FMUs, the state natural heritage database is reviewed by TCF as part of the THP process; any listed species are assumed to be present. Prior to the commencement of any planned site-disturbing activity, surveys are conducted to determine the presence of any RTE species. |

| | |
|---|--|
| TCF maintains open communication with the surrounding community and interested professionals, including organizing periodic field trips to highlight successes and challenges, | Per FM Indicator 8.2.d.4, TCF staff maintains logs of outreach and communication with the local public for each FMU. |
| TCF has been a great company to work for and the people I work with are caring, knowledgeable, professional people that I really enjoy working with. Everyone tries to help each other. | Duly noted. |
| They really do care about the company and their job as stewards of the land. Each time I go out there with them, I learn more and find it has changed my understanding of forestry. The people and the company are the best I have ever worked for and I love what I do with TCF. | Duly noted. |
| They are very good landowners to work for. We have great communication on the management of the forests we manage for them including FSC protocol and policies. We enjoy working for a client who wants to see good silviculture and in the end a better property than it was before. | Per FM Indicator 8.2.d.1, FME foresters are in regular communication with operators during active harvests, dropping by at least twice a week. These site visits serve to ensure that harvest plans are properly implemented, including silvicultural prescriptions. |
| TCF is a good community supporter. During a recent conservation easement process a meeting with town officials and hunt club (lessee) representatives was conducted. One of the group mentioned this was the first time they were ever invited to such a meeting where their thoughts and concerns were being heard. This went a long way in the community and within the hunting clubs that lease the lands. | Per MF Indicator 4.4.a, TCF is highly aware of and considers carefully the potential social impacts of its management impacts on the resources and local community. |

6. Certification Decision

| | |
|--|---|
| The certificate holder has demonstrated continued overall conformance to the applicable Forest Stewardship Council standards. The SCS annual evaluation team recommends that the certificate be sustained, subject to subsequent annual evaluations and the FME's response to any open CARs. | Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> |
| Comments: | |

7. Annual Data Update

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

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

Name and Contact Information

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

FSC Sales Information

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

Scope of Certificate

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

| | | | |
|--|--------------------------------------|---|---|
| Forest zone | <input type="checkbox"/> Boreal | <input checked="" type="checkbox"/> Temperate | |
| | <input type="checkbox"/> Subtropical | <input type="checkbox"/> Tropical | |
| Total forest area in scope of certificate which is: | | | Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac |
| privately managed | 132,647 | | |
| state managed | | | |
| community managed | | | |
| Number of FMUs in scope that are: | | | |
| less than 100 ha in area | | 100 - 1000 ha in area | 1 |
| 1000 - 10 000 ha in area | 8 | more than 10 000 ha in area | 1 |
| Total forest area in scope of certificate which is included in FMUs that: | | | Units: <input type="checkbox"/> ha or <input type="checkbox"/> ac |
| are less than 100 ha in area | | | |
| are between 100 ha and 1000 ha in area | 2,041 | | |
| meet the eligibility criteria as <i>low intensity</i> SLIMF FMUs | | | |
| Division of FMUs into manageable units: | | | |
| Divided among the following 10 properties. | | | |
| <u>California</u> | | | |
| Garcia River Forest – 24,000 acres | | | |
| Gualala Forest – 14,000 acres | | | |
| Big River and Salmon Creek – 16,000 acres | | | |
| Buckeye Forest – 18,120 acre | | | |
| <u>Vermont</u> | | | |
| McConnell Pond – 4,665 acres | | | |
| <u>Maine</u> | | | |
| East Grand Lake – 4,544 acres | | | |
| Reed Plantation – 32,431 acres | | | |
| <u>Pennsylvania</u> | | | |
| Penfield Forest – 2,041 acres | | | |
| <u>New Hampshire</u> | | | |
| Success Pond – 8,900 acres | | | |
| <u>New York</u> | | | |
| Cranberry Lake – 8,162 acres | | | |

Non-SLIMF FMUs (Group or Multiple FMU Certificates)

| Name | Contact information | Latitude/ longitude of Non-SLIMF FMUs | |
|------|---------------------|---------------------------------------|----|
| NA | NA | NA | NA |

Social Information

| | | |
|---|-------------------|----------|
| Number of forest workers (including contractors) working in forest within scope of certificate (differentiated by gender): | | |
| male workers: 70 | female workers: 8 | |
| Number of accidents in forest work since previous evaluation: | Serious: 1 | Fatal: 0 |

Pesticide and Other Chemical Use

| <input type="checkbox"/> FME does not use pesticides. | | | | |
|---|-------------------|---|---|--|
| Commercial name of pesticide / herbicide | Active ingredient | Quantity applied since previous evaluation (kg or lbs.) | Total area treated since previous evaluation (ha or ac) | Reason for use |
| | Glyphosate | 5.16 gallons | 26 acres | Invasive species management |
| Rodeo | Glysohate | 2.92 fluid Oz. | Multiple spots single stems/small patches | Japanese Knotweed along Grasse River. Trying to eradicate and prevent spread |
| Accord XRT-II | Glysohate | 0.24 fluid oz. | 10 sq. ft. – small patch | Japanese Knotweed |
| Rodeo | Glysohate | 6.4 fluid oz. | Less than 1 acre | Common Reed Grass - Phragmites |

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) | 117,305 |
| Area of production forest classified as 'plantation' | 0 |
| Area of production forest regenerated primarily by replanting or by a combination of replanting and coppicing of the planted stems | 0 |
| Area of production forest regenerated primarily by natural regeneration, or by a combination of natural regeneration and coppicing of the naturally regenerated stems | 117,305 |
| Silvicultural system(s) | Area under type of management |
| Even-aged management | 0 |
| Clearcut (clearcut size range) | |
| Shelterwood | |
| Other: | |

| | |
|---|---------|
| Uneven-aged management | 117,305 |
| Individual tree selection | |
| Group selection | |
| Other: | |
| <input type="checkbox"/> Other (e.g. nursery, recreation area, windbreak, bamboo, silvo-pastoral system, agro-forestry system, etc.) | |
| Non-timber Forest Products (NTFPs) | |
| Area of forest protected from commercial harvesting of timber and managed primarily for the production of NTFPs or services | 0 |
| Other areas managed for NTFPs or services | 0 |
| Approximate annual commercial production of non-timber forest products included in the scope of the certificate, by product type | 0 |
| Species in scope of joint FM/COC certificate: (Scientific / Latin Name and Common / Trade Name) | |
| <i>Abies balsamea, Abies concolor, Acer rubrum, Acer saccharum, Alnus rubra, Betula alleghaniensis, Betula nigra, Betula papyrifera, Carya spp., Fagus grandifolia, Fraxinus americana, Fraxinus nigra, Larix laricina, Liquidambar styraciflua, Liriodendron tulipifera, Notholithocarpus densiflorus, Picea glauca, Pinus lambertiana, Picea mariana, Picea rubens, Pinus strobus, Pinus taeda, Populus balsamifera, Populus grandidentata, Populus tremuloides, Prunus serotina, Pseudotsuga menziesii, Quercus alba, Quercus rubra, Quercus spp., Sequoia sempervirens, Thuja occidentalis, Tilia americana, Tsuga canadensis</i> | |

FSC Product Classification

| | | |
|--------------------------------------|------------------------|---|
| Timber products | | |
| Product Level 1 | Product Level 2 | Species |
| W1 Rough Wood | W1.1 Roundwood (logs) | All |
| Non-Timber Forest Products | | |
| Product Level 1 | Product Level 2 | Product Level 3 and Species |
| W3 Wood in chips or particles | W3.1 Wood chips | <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> |

Conservation and High Conservation Value Areas

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

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

| High Conservation Value Forest / Areas | | | Units: <input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac |
|---|---|---|---|
| Code | HCV Type | Description & Location | Area |
| HCV1 | Forests or areas containing globally, regionally or nationally significant concentrations of biodiversity values (e.g. endemism, endangered species, refugia). | North Coast, CA; Northern Spotted Owl habitat Reed Plantation; Wood Turtle, Creeper, Brook Floater | 2,737 283 |
| HCV2 | Forests or areas containing globally, regionally or nationally significant large landscape level forests, contained within, or containing the management unit, where viable populations of most if not all naturally occurring species exist in natural patterns of distribution and abundance. | | |
| HCV3 | Forests or areas that are in or contain rare, threatened or endangered ecosystems. | North Coast, CA; Oak woodlands and grasslands. | 1,195 |
| HCV4 | Forests or areas that provide basic services of nature in critical situations (e.g. watershed protection, erosion control). | Class I Streams North Coast, CA Forested wetlands, Success Pond, NH | 3,066 106 |
| HCV5 | Forests or areas fundamental to meeting basic needs of local communities (e.g. subsistence, health). | | |
| HCV6 | Forests or areas critical to local communities’ traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities). | | |
| Total area of forest classified as ‘High Conservation Value Forest / Area’ | | | 7,387 |

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

| |
|---|
| <input type="checkbox"/> N/A – All forestland owned or managed by the applicant is included in the scope. |
|---|

| | | |
|--|--|---|
| <input checked="" type="checkbox"/> Applicant owns and/or manages other FMUs not under evaluation. | | |
| <input type="checkbox"/> Applicant wishes to excise portions of the FMU(s) under evaluation from the scope of certification. | | |
| Explanation for exclusion of FMUs and/or excision: | The Conservation Fund is a national organization, with land holdings throughout the United States. Some of the organization’s properties are FSC-certified, some SFI-certified, and some are dual FSC- and SFI-certified. The certified lands are the properties that support timber harvesting. TCF’s other forested properties are either not managed for timber or are set to be sold in the near future. | |
| Control measures to prevent mixing of certified and non-certified product (C8.3): | All properties where harvesting occurs use an invoicing system that must state the property of origin. | |
| Description of FMUs excluded from, or forested area excised from, the scope of certification: | | |
| Name of FMU or Stand | Location (city, state, country) | Size (<input type="checkbox"/> ha or <input checked="" type="checkbox"/> ac) |
| 4 State Forest | VT, NH | 21,916 |
| Twin Lakes | Iron County, WI | 14,029 |
| Brunswick | Brunswick, NC | 3,670 |
| Clarion Junction | McKean and Elk Counties, PA | 32,598 |
| Bly Hollow | NY, VT | 22,563 |
| Haynes | Hancock, Washington CO, ME | 17,881 |
| Skinner Mountain | Overton and Fentress Co, TN | 14,770 |
| Logan | Logan and Mingo, WV | 16,229 |
| CFI | Bulloch, Bryan, Jeff Davis, Appling, GA | 14,225 |
| Chesapeake Forest | Eastern Shore, VA | 8,710 |

SECTION B – APPENDICES (CONFIDENTIAL)

Appendix 1 – List of FMUs Selected for Evaluation

- FME consists of a single FMU
 FME consists of multiple FMUs or is a Group

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

| FMU Name | FMU Size Category: - SLIMF - non-SLIMF - Large > 10,000 ha | Forest Type: - Plantation - Natural Forest | Rationale for Selection: - Random Sample - Stakeholder issue - Ease of access - Other (please describe) |
|---------------------------------|---|--|---|
| Cranberry Lake (NY) | non-SLIMF | Natural Forest | New FMU |
| Big River and Salmon Creek (CA) | non-SLIMF | Natural Forest | Random sample stratified by region |
| Garcia River Forest (CA) | non-SLIMF | Natural Forest | Random sample stratified by region |
| Gualala Forest (CA) | non-SLIMF | Natural Forest | Random sample stratified by region |
| Reed Plantation (ME) | Large | Natural Forest | New FMU |

Appendix 2 – Staff and Stakeholders Consulted

List of FME Staff Consulted

| Name | Title | Contact Information | Consultation method |
|------------------|--|--|---------------------|
| David Whitehouse | Forest Operations Manager, Working Forest Fund | dwhitehouse@conservationfund.org 919-951-0118 North Carolina Office | in person |
| Scott Kelly | Timberlands Manager | skelly@conservationfund.org 707-272-4497 Ukiah Office, CA | in person |
| Holly Newberger | North Coast Program Coordinator | hnewberger@conservationfund.org Phone: 707-962-0712 Casper Office, CA | in person |
| Lauren Fety | Forest Analyst | lfety@conservationfund.org 541-727-2094 Ukiah Office, CA | in person |
| Madison Thomson | Registered Professional Forester | mthomson@conservationfund.org 707-272-4497 Ukiah Office, CA | in person |

| | | | |
|------------------|---|---|-----------|
| Trevor Cutsinger | Business Manager Working Forest Fund | tcutsinger@conservationfund.org 803-295-2598 North Carolina Office | in person |
| Scott Tison | Real Estate Legal Manager | stison@conservationfund.org Headquarters, Arlington, VA | in person |
| Olivia Fiori | Forestry Technician | 831-245-9868 Ukiah Office, CA | in person |
| Tom Gilman | F & W, Regional Manager | (518) 359-3089 | in person |
| P J Kavanaugh | F & W, Forester | Company number: 229-883-0505 | in person |
| David Dow | Prentiss & Carlisle, Chief Forester | dbdow@prentissandcarlisle.com | in person |
| Bob Chandler | Prentiss & Carlisle, Forester | Company number: 207-942-8295 | in person |

List of other Stakeholders Consulted*

| Name | Organization | Contact Information | Consultation method | Requests Cert. Notf. |
|-----------------|---|------------------------------|---------------------|----------------------|
| Gerardo Sanchez | Piper Logging, faller | 707-895-2674 | in person | no |
| Steve Agius | US Fish & Wildlife Service | steve_agius@fws.gov | email | yes |
| Greg Giusti | University of California, Division of Agriculture & Natural Resources | gagiusti@ucanr.edu | email | no |
| Mike Stephens | Mike Stephens Wildlife Consulting | 707-489-6919 | phone | yes |
| Ben Machin | Redstart, Inc. | ben@redstartconsulting.com | email | yes |
| Brian Hurt | Wylatti Resource Management | 707-489-1463 | phone | no |
| Anonymous | - | - | email | yes |
| Don Miller | Security Contractor, TCF | millerdllt@hotmail.com | email | no |
| Thomas Gilman | F&W Forestry Services, Inc. | thomas.gilman@fwforestry.com | email | yes |
| Alan Levine | Coast Action Group | alevine@mcn.org | email | yes |
| Anonymous | - | - | phone | no |

* Note: SCS may maintain additional records of stakeholder consultation activities (e.g., email notifications) in its recordkeeping system. Stakeholders included in Appendix 2 have given their permission to include their name, contact details, and comments in the report. Anonymous stakeholders may have provided comments as a part of stakeholder outreach activities.

Appendix 3 – Additional Evaluation Techniques Employed

None.

Additional techniques employed (*describe*):

Appendix 4 – Pesticide Derogations

There are no active pesticide derogations for this FME.

Appendix 5 – Forest Management Standard Conformance Table

| | |
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| Criteria required by FSC at every surveillance evaluation (<i>check all situations that apply</i>) | <input type="checkbox"/> NA – all FMUs are exempt from these requirements. <input type="checkbox"/> Plantations > 10,000 ha (24,710 ac): 2.3, 4.2, 4.4, 6.7, 6.9, 10.6, 10.7, and 10.8 <input checked="" type="checkbox"/> Natural forests > 50,000 ha (123,553 ac) ('low intensity' SLIMFs exempt): 1.5, 2.3, 3.2, 4.2, 4.4, 5.6, 6.2, 6.3, 8.2, and 9.4 <input checked="" type="checkbox"/> FMUs containing High Conservation Values ('small forest' SLIMFs exempt): 6.2, 6.3, 6.9 and 9.4 |
| Documents and records reviewed for FMUs/sites sampled | <input checked="" type="checkbox"/> All applicable documents and records as required in section 7 of audit plan were reviewed; or <input type="checkbox"/> The following documents and records as required in section 7 of the audit plan were NOT reviewed (<i>provide explanation</i>): |

Requirements Reviewed in Annual Evaluation

| Evaluation Year | Requirements Reviewed (FSC P&C Reviewed, FM/COC Indicators, Trademark Indicators, Group Standard Indicators, etc.) |
|-----------------|--|
| 2017 | All – (Re)certification Evaluation |
| 2018 | This year's assessment will include a review of FM Indicators 1.5, 4.2, 4.4, 5.3, 5.6, 6.2, 6.3, 6.4, 6.5, 6.9, 8.2, and 9.4; FM Principles 2 and 3; and Trademark Standard. |
| 2019 | |
| 2020 | |
| 2021 | |

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

| REQUIREMENT | C/NC | COMMENT/CAR |
|---|------|-------------|
| P1 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. | | |

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| This principle was not evaluated this year, and no findings were issued for any of the indicators in the principle. | | |
| C1.1 Forest management shall respect all national and local laws and administrative requirements. | NE | - |
| C1.2. All applicable and legally prescribed fees, royalties, taxes and other charges shall be paid. | NE | - |
| C1.3. In signatory countries, the provisions of all binding international agreements such as CITES, ILO Conventions, ITTA, and Convention on Biological Diversity, shall be respected. | NE | - |
| 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. | NE | - |
| C1.5. Forest management areas should be protected from illegal harvesting, settlement and other unauthorized activities. | C | - |
| 1.5.a. The forest owner or manager supports or implements measures intended to prevent illegal and unauthorized activities on the <i>Forest Management Unit (FMU)</i> . | C | On the North Coast, TCF provides protection from illegal and unauthorized activities on the forest by gating most access roads and keeping the gates locked. They also hire a patrol person to look for illegal access and activities. Some activities, such as hiking, are allowed with a written permit. FME staff and contractors also provide security through their day-to-day activities on the FMUs. In addition, due to the pervasive nature of illegal marijuana plantations in the region, each year (approximately in June) the FME flies the properties to look for marijuana grows. GPS coordinates for any discovered marijuana grows are provided to the sheriff, although the prevalence of the illegal grow sites has been declining in recent years and the frequency of flyovers may be reduced. There also |

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| | | <p>have not been significant water diversions or land clearing related to marijuana grows in recent years.</p> <p>On Cranberry Lake and Reed Plantation FMUs, TCF provides protection from illegal and unauthorized activities on the forest by gating most access avenues and keeping the gates locked or by rock barriers. Local law enforcement is used if issues arise.</p> |
| <p>1.5.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> | C | <p>On the North Coast, the main types of illegal activities include unpermitted access and illegal marijuana growing. Illegal marijuana growing is handled by reporting and cooperating with the appropriate law enforcement. The sheriff won't take action on illegal grows under 200 plants, but it will eradicate the following summer. No instances of timber theft. If timber theft was discovered, then it would be referred to CAL FIRE. Unauthorized trespass is most often avoided by requiring the people to fill out a permit for access.</p> <p>There are no issues pertaining to illegal or unauthorized activities on the Cranberry Lake and Reed Plantation FMUs. Local authorities will be contacted should issues arise.</p> |
| <p>C1.6. Forest managers shall demonstrate a long-term commitment to adhere to the FSC Principles and Criteria.</p> | NE | - |
| <p>P2 Long-term tenure and use rights to the land and forest resources shall be clearly defined, documented and legally established.</p> | | |
| <p>C2.1. Clear evidence of long-term forest use rights to the land (e.g., land title, customary rights, or lease agreements) shall be demonstrated.</p> | C | - |
| <p>2.1.a. The forest owner or manager provides clear evidence of <i>long-term</i> rights to use and manage the FMU for the purposes described in the management plan.</p> | C | <p>Parcels on the North Coast are held in fee simple by TCF. Forest management activities allowed in conservation easement areas provide long-term rights to use and manage the FMU for the purposes described in the FMP.</p> |

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| | | <p>Cranberry Lake and Reed Plantation are owned in fee by TCF. Titles are clear, and there are no restrictive easements or encumbrances that might interfere with management of the property. Witnessed deeds for ownership and records for payment of taxes. Tax payment is current.</p> |
| <p>2.1.b. The forest owner or manager identifies and documents legally established use and access rights associated with the FMU that are held by other parties.</p> | <p>C</p> | <p>The property deeds for the North Coast FMUs are held in the North Carolina office and in TCF’s central office in Arlington, VA. Digital copies are available at the Caspar Office in CA.</p> <p>Reciprocal right-of-way agreements exists with some adjacent properties. Conservation easements are on Garcia and Gualala FMUs; the easements require management to facilitate long-term late seral growth and prohibits subdivision. TCF owns the mineral rights.</p> <p>Deeds for Cranberry Lake and Reed Plantation FMUs are also held in the North Carolina office and in TCF’s central office in Arlington, VA. Witnessed deeds for ownership.</p> |
| <p>2.1.c. Boundaries of land ownership and use rights are clearly identified on the ground and on maps prior to commencing management activities in the vicinity of the boundaries.</p> | <p>C</p> | <p>Excellent maps were available for field visits to all FMUs; these maps accompany the harvest plan for each unit that is provided to the operator. Property lines are clearly marked on the ground, as confirmed by auditor observations. FME foresters review ownership boundaries while meeting with each operator before harvesting commences.</p> <p>Additionally, FME foresters check in regularly through site visits (typically at least 2 times per week) during active operations, at which point any questions about ownership boundaries are addressed.</p> |
| <p>C2.2. Local communities with legal or customary tenure or use rights shall maintain control, to the extent necessary to protect their rights or resources, over forest operations unless they delegate control with free and informed consent to other agencies.</p> | <p>C</p> | <p>-</p> |

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| <p>2.2.a. The forest owner or manager allows the exercise of <i>tenure</i> and <i>use rights</i> allowable by law or regulation.</p> | <p>C</p> | <p>Although they are not legal use rights, TCF allows recreational access and collecting on the North Coast FMUs by permit.</p> <p>For Cranberry Lake and Reed Plantation, there are longstanding, 5-party crossing rights to access nearby parcels of forest land. Snowmobile trail is a permanent easement access right.</p> |
| <p>2.2.b. In FMUs where tenure or use rights held by others exist, the forest owner or manager consults with groups that hold such rights so that management activities do not significantly impact the uses or benefits of such rights.</p> | <p>C</p> | <p>The FME actively consults with TNC as the conservation easement holder on the North Coast. TNC monitors the conservation easements.</p> <p>For Cranberry Lake and Reed Plantation FMUs, consultation is done when needed, e.g., annual lease agreements are negotiated with camp owners, ATV groups, snowmobile organizations, etc. TCF carries liability insurance on camps on leased lands.</p> |
| <p>C2.3. Appropriate mechanisms shall be employed to resolve disputes over tenure claims and use rights. The circumstances and status of any outstanding disputes will be explicitly considered in the certification evaluation. Disputes of substantial magnitude involving a significant number of interests will normally disqualify an operation from being certified.</p> | <p>C</p> | <p>-</p> |
| <p>2.3.a. If <i>disputes</i> arise regarding tenure claims or use rights then the forest owner or manager initially attempts to resolve them through open communication, negotiation, and/or mediation. If these good-faith efforts fail, then federal, state, and/or local laws are employed to resolve such disputes.</p> | <p>C</p> | <p>No disputes have arisen over tenure rights on any of the FMUs. FME staff explain that if a dispute were to arise, the organization would make a good-faith effort to resolve the issue outside of court through open communication, negotiation, and/or mediation.</p> |
| <p>2.3.b. The forest owner or manager documents any significant disputes over tenure and use rights.</p> | <p>C</p> | <p>Records of disputes are kept on file along with an explanation of the course of action that was implemented to address the issue. Issues have been</p> |

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| | | minor and not over tenure or use rights. Witnessed log. |
| P3 The legal and customary rights of indigenous peoples to own, use and manage their lands, territories, and resources shall be recognized and respected. | | |
| C3.1. Indigenous peoples shall control forest management on their lands and territories unless they delegate control with free and informed consent to other agencies. | NA | TCF property does not include any lands owned or claimed by Native Americans, so this criterion and associated indicators is not applicable. |
| 3.1.a. 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 | - |
| 3.1.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 | - |
| C3.2. Forest management shall not threaten or diminish, either directly or indirectly, the resources or tenure rights of indigenous peoples. | C | - |
| 3.2.a. During management planning, the forest owner or manager consults with American Indian groups that have legal rights or other binding agreements to the FMU to avoid harming their resources or rights. | C | <p>A list of Mendocino County Native American contacts is maintained and updated regularly by CAL FIRE. This list is used in the management of the North Coast FMUs. As part of the state-required THP process for private forest management, the FME utilizes the agency’s database to identify tribal representatives to which letters requesting input on planned activities are mailed in order to confirm that no harm will come to their resources or rights.</p> <p>For Cranberry Lake and Reed Plantation FMUs, TCF has conducted outreach to 5 communities of indigenous people. Responses were for areas not on TCF property.</p> |

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| <p>3.2.b. Demonstrable actions are taken so that forest management does not adversely affect tribal resources. When applicable, evidence of, and measures for, protecting tribal resources are incorporated in the management plan.</p> | <p>C</p> | <p>Most rights of Native Americans related to protection of archaeological sites. Per California Forest Practice Rules, these sites must be protected, and their protection must take input from tribes into account. Protection measures for tribal resources are incorporated into the THP prior to approval for all harvests occurring on the North Coast FMUs. Consultation with the appropriate tribal groups is required and the state archeologist reviews protection measures.</p> <p>For Cranberry Lake and Reed Plantation FMUs, tribal resources have not been identified onsite. However, foresters are aware of the need to protect these resources if found.</p> |
| <p>C3.3. Sites of special cultural, ecological, economic or religious significance to indigenous peoples shall be clearly identified in cooperation with such peoples, and recognized and protected by forest managers.</p> | <p>C</p> | <p>-</p> |
| <p>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.</p> | <p>C</p> | <p>Per comments in 3.2.a., consultation with tribal representatives is required as a part of the THP approval process for harvests on the North Coast. CAL FIRE provides a search capability for significant cultural or historical sites, and this search is part of the process for planning of THP's.</p> <p>For Cranberry Lake and Reed Plantation FMUs, per comments in 3.2.a., consultation with tribal representatives is required as a part of the THP approval process. Letters have been sent to 5 local communities of indigenous people in the Success Pond area inviting consultation. Responses were for areas not on TCF property.</p> |
| <p>3.3.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).</p> | <p>C</p> | <p>Per comments in 3.2.b., most rights of Native Americans relate to protection of archaeological sites, and these sites must be protected based on input from tribes for harvests that occur on the North Coast. Protection measures for tribal resources are incorporated into the THP prior to</p> |

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| | | <p>approval. Consultation with the appropriate tribal groups is required and the state archeologist reviews protection measures.</p> <p>For Cranberry Lake and Reed Plantation FMUs, responses were for areas not on TCF property. If areas of special significance are found, they will be protected, per interview with area forester.</p> |
| <p>C3.4. Indigenous peoples shall be compensated for the application of their traditional knowledge regarding the use of forest species or management systems in forest operations. This compensation shall be formally agreed upon with their free and informed consent before forest operations commence.</p> | NA | <p>Forest management activities on TCF properties does not use traditional knowledge of indigenous peoples, so this criterion and associated indicators is not applicable.</p> |
| <p>3.4.a. The forest owner or manager identifies whether <i>traditional knowledge</i> in forest management is being used.</p> | NA | - |
| <p>3.4.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.</p> | NA | - |
| <p>3.4.c. The forest owner or manager respects the confidentiality of tribal traditional knowledge and assists in the protection of such knowledge.</p> | NA | - |
| <p>P4 Forest management operations shall maintain or enhance the long-term social and economic well-being of forest workers and local communities.</p> | | |
| <p>C4.1. - The communities within, or adjacent to, the forest management area should be given opportunities for employment, training, and other services.</p> | NE | - |
| <p>C4.2. Forest management should meet or exceed all applicable laws</p> | C | - |

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| <p>and/or regulations covering health and safety of employees and their families.</p> | | |
| <p>4.2.a. The forest owner or manager meets or exceeds all applicable laws and/or regulations covering health and safety of employees and their families (also see Criterion 1.1).</p> | <p>C</p> | <p>TCF has a <i>Commitment to Safety and Health</i> document that details its approach to maintaining a safe working environment. Specific company safety policies include: (1) frequent tailgate safety meetings—at least a half hour per month of safety training; (2) wearing personal protective equipment, including at all active harvest sites; (3) reporting all injuries, near-accidents, and hazardous conditions; and (4) holding employees accountable for poor safety performance by re-training and taking disciplinary action.</p> <p>Based on observations and interviews with FME staff and contractors, TCF appears to meet all applicable laws and regulations covering the health and safety of employees and their families. This is also true for contractors hired by TCF. All appropriate documents related to health and safety and worker’s rights are prominently displayed in the Caspar, CA office. Documents were also witnessed in the office of field service providers.</p> |
| <p>4.2.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> | <p>C</p> | <p>Based on field observations, TCF’s employees and contractors demonstrate a safe work environment. Appropriate PPE was utilized by employees and provided to the audit team, logging crews were seen wearing appropriate PPE on active sites, and FME staff were cognizant of the need to wear seat belts and drive safely. Interviews with contractors and review of FME documents indicates that both the FME and its contracted workers have a good safety track record.</p> <p>Contracts require that the contractors provide appropriate PPE for the forest work being done. Minimal expectations are listed, but the contract specifies that the specific safety requirements must be met by the contractors.</p> |
| <p>4.2.c. The forest owner or manager hires well-qualified service providers</p> | <p>C</p> | <p>Based on interviews with FME staff and observations of in-woods work, the service</p> |

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| <p>to safely implement the management plan.</p> | | <p>providers contracted by the FME are well-qualified. For example, all logging in CA is carried out by LTOs, herbicide contractors are licensed PCAs in CA, and botanical and wildlife surveys are carried out by trained professionals. When pesticide application is handled by TCF staff, a forester who is certified as QAL is utilized.</p> <p>For the</p> <p>At Reed Plantation and Cranberry Lake, loggers have completed state logger training program and are current with training. The state logger training program provide safety, endangered species, and BMP training. Chemical contractors have completed state applicator licensing. Witnessed training records for logger and applicators license.</p> |
| <p>C4.3 The rights of workers to organize and voluntarily negotiate with their employers shall be guaranteed as outlined in Conventions 87 and 98 of the International Labor Organization (ILO).</p> | <p>NE</p> | <p>-</p> |
| <p>C4.4. 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.</p> | <p>C</p> | <p>-</p> |
| <p>4.4.a. The forest owner or manager understands the likely social impacts of management activities, and incorporates this understanding into management planning and operations. Social impacts include effects on: Archeological sites and sites of cultural, historical and community significance (on and off the FMU); Public resources, including air, water and food (hunting, fishing, collecting);</p> | <p>C</p> | <p>TCF is highly aware of and considers carefully the potential social impacts of its management impacts on the resources and local community. For the North Coast FMUs, the FME has a local advisory committee actively engaged in planning and review of planned activities. The FME annually publishes and makes available to the public an annual report about the North Coast Forest Conservation Initiative. The latest edition from 2017 was reviewed during the audit. Included in this is the Caspar Index, which includes several environmental, economic, and social metrics demonstrating impact.</p> |

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| <p>Aesthetics; Community goals for forest and natural resource use and protection such as employment, subsistence, recreation and health; Community economic opportunities; Other people who may be affected by management operations. A summary is available to the CB.</p> | | <p>For all FMUs sampled this year, TCF maintains a list of stakeholders in the local communities that they use to invite people to their tours and for other consultation purposes. They have actively sought out the engagement of community members who may be affected by or have an interest in their forest management activities. Specialist have been contacted, and databases have been used to assist in conducting assessment of archeological, cultural, historical, and community significance.</p> |
| <p>4.4.b. The forest owner or manager seeks and considers input in management planning from people who would likely be affected by management activities.</p> | <p>C</p> | <p>As described in 4.4.a, TCF takes effort to seek and considers the input from people who would most likely be affected by management activities; this is especially evident on the North Coast. The THP review process in CA includes a mandatory contact of adjacent and downstream landowners. Public access to the SYP and each THP is provided by CAL FIRE. Public notices of activities such as herbicide use are posted at least 30 days prior to planned activities and are filed with the county agriculture commissioner.</p> <p>TCF also considers input in management planning from local people when it undertakes forest management planning on the Cranberry Lake and Reed Plantation FMUs. Properties are in conservation easements for the continued management of the ecosystem. Witnessed email for town meeting for Reed Plantation.</p> |
| <p>4.4.c. People who are subject to direct adverse effects of management operations are apprised of relevant activities in advance of the action so that they may express concern.</p> | <p>C</p> | <p>Following the California Forest Practice Act Rules, each proposed THP on the North Coast FMUs is announced to all relevant parties with a request for input. Relevant parties include neighbors, tribes, and other members of the local community. This announcement is critical to the stakeholder consultation process for THPs.</p> <p>For Cranberry Lake and Reed Plantation FMUs, TCF notifies adjacent landowners when needed, confirmed per interview. Properties are in conservation easements for the continued</p> |

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| | | management of the ecosystem. Witnessed email for town meeting for Reed Plantation. |
| <p>4.4.d. For <i>public forests</i>, consultation shall include the following components:</p> <p>Clearly defined and accessible methods for public participation are provided in both long and short-term planning processes, including harvest plans and operational plans;</p> <p>Public notification is sufficient to allow interested stakeholders the chance to learn of upcoming opportunities for public review and/or comment on the proposed management;</p> <p>An accessible and affordable appeals process to planning decisions is available.</p> <p>Planning decisions incorporate the results of public consultation. All draft and final planning documents, and their supporting data, are made readily available to the public.</p> | NA | TCF is not a public forest, so this criterion and associated indicators is not applicable. |
| <p>C4.5. Appropriate mechanisms shall be employed for resolving grievances and for providing fair compensation in the case of loss or damage affecting the legal or customary rights, property, resources, or livelihoods of local peoples. Measures shall be taken to avoid such loss or damage.</p> | NE | - |
| <p>P5 Forest management operations shall encourage the efficient use of the forest’s multiple products and services to ensure economic viability and a wide range of environmental and social benefits.</p> | | |
| <p>C5.1. Forest management should strive toward economic viability, while taking into account the full environmental, social, and operational costs of production, and</p> | NE | - |

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| <p>ensuring the investments necessary to maintain the ecological productivity of the forest.</p> | | |
| <p>C5.2. Forest management and marketing operations should encourage the optimal use and local processing of the forest’s diversity of products.</p> | NE | - |
| <p>C5.3. Forest management should minimize waste associated with harvesting and on-site processing operations and avoid damage to other forest resources.</p> | C | - |
| <p>5.3.a. Management practices are employed to minimize the loss and/or waste of harvested forest products.</p> | C | Harvested units inspected during the audit showed good utilization of merchantable material. |
| <p>5.3.b. Harvest practices are managed to protect residual trees and other forest resources, including: soil compaction, <i>rutting</i> and erosion are minimized; residual trees are not significantly damaged to the extent that health, growth, or values are noticeably affected; damage to NTFPs is minimized during management activities; and techniques and equipment that minimize impacts to vegetation, soil, and water are used whenever feasible.</p> | C | <p>Overall, site visits demonstrated that TCF foresters and contractors take great care to protect residual trees and other forest resources when harvesting.</p> <p>During the 2017 recertification evaluation, residual damage was observed on the North Coast at the Ironing Board THP, a closed-out harvest on the Big River Forest. An OBS was issued (see Finding 2017.1). In response, TCF instructed its logging contractors to use care in selective harvests and employ damage prevention measures such as designating “rub” trees to be harvested after skidding is done, thereby leaving a clean stand upon completion. No significant residual damage was noted at harvest sites in 2018 on the North Coast, Cranberry Lake, nor Reed Plantation FMUs. Witnessed reports for monitoring conducted during harvesting operations. No issues identified. Various GIS databases are used to plan the logging activities to be scheduled during the time of the year to create the least damage to the site.</p> |
| <p>C5.4. Forest management should strive to strengthen and diversify the</p> | NE | - |

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| <p>local economy, avoiding dependence on a single forest product.</p> | | |
| <p>C5.5. Forest management operations shall recognize, maintain, and, where appropriate, enhance the value of forest services and resources such as watersheds and fisheries.</p> | <p>NE</p> | <p>-</p> |
| <p>C5.6. The rate of harvest of forest products shall not exceed levels which can be permanently sustained.</p> | <p>C</p> | |
| <p>5.6.a. In FMUs where products are being harvested, the landowner or manager calculates the sustained yield harvest level for each sustained yield planning unit, and provides clear rationale for determining the size and layout of the planning unit. The sustained yield harvest level calculation is documented in the Management Plan.</p> <p>The sustained yield harvest level calculation for each planning unit is based on:</p> <ul style="list-style-type: none"> documented growth rates for particular sites, and/or acreage of forest types, age-classes and species distributions; mortality and decay and other factors that affect net growth; areas reserved from harvest or subject to harvest restrictions to meet other management goals; silvicultural practices that will be employed on the FMU; management objectives and desired future conditions. | <p>C</p> | <p>On the North Coast FMUs, TCF utilizes inventory data to model sustainable growth levels into the future. The Option A document approved by CAL FIRE includes the sustainability calculations for Garcia River, Gualala, and Big River and Salmon Creek properties. Option A under California Forest Practice Rules requires accurate inventory data and growth and harvest projection over the next 100-year planning period. This information is produced by a growth and yield model with inventory and management inputs and is reviewed by CAL FIRE as part of the approval process. The annual harvests from the four parcels on the North Coast are below the AAC calculated in the Option A document.</p> <p>TCF maintains a through inventory system with permanent plots on the North Coast, driven in part by its need to calculate carbon storage. A standard inventory is completed, and then growth is projected using CRYPTOS (the standard software for projecting conifer growth in the redwood region). Growth and yield projections rely on the established site classes for the forest area. Areas excluded from harvesting are not included in the calculation.</p> <p>For Cranberry Lake, the Timber Harvesting Sustainability Summary and Tracking report indicates harvest volumes from 2015-2018 are below forecasted annual harvest in forest management plan.</p> |

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| <p>The calculation is made by considering the effects of repeated prescribed harvests on the product/species and its ecosystem, as well as planned management treatments and projections of subsequent regrowth beyond single rotation and multiple re-entries.</p> | | <p>For Reed Plantation, the conservation easement held by the Forest Society of Maine requires that in the period prior to and including 31 December 2026 the sustainable harvest level volume shall not exceed a total of 55,000 cords. During the time period from January 1, 2027 to December 31, 2037 the sustainable harvest level volumes shall not exceed 82,000 cords total.</p> |
| <p>5.6.b. Average annual harvest levels, over rolling periods of no more than 10 years, do not exceed the calculated sustained yield harvest level.</p> | <p>C</p> | <p>Harvest levels on the North Coast FMUs provided to the audit team and published in the annual report are far below the AAC calculated in the approved Option A document.</p> <p>Examining harvest levels over time, it is clear that the harvest volumes in 2009-2011 were relatively low. This was due to the poor wood product markets during the Great Recession, allowing the forests to build up stocking and now support higher harvest levels. More recently, harvest levels have remained under AAC.</p> <p>For Cranberry Lake, the Timber Harvesting Sustainability Summary and Tracking report indicates harvest volumes from 2015-2018 are below forecasted annual harvest in forest management plan.</p> <p>For Reed Plantation, the conservation easement held by the Forest Society of Maine requires that in the period prior to and including December 31, 2026 the sustainable harvest level volume shall not exceed a total of 55,000 cords. During the time period from January 1, 2027 to December 31, 2037 the sustainable harvest level volumes shall not exceed 82,000 cords total.</p> |
| <p>5.6.c. Rates and methods of timber harvest lead to achieving desired conditions, and improve or maintain health and quality across the FMU. Overstocked stands and stands that have been depleted or rendered to be below productive potential due to</p> | <p>C</p> | <p>Previous owners of the TCF properties on the North Coast had overharvested as part of intensive industrial forest management practices. TCF's light touch and low harvest levels are designed to increase standing stocks and accelerate the transition to a late seral forest.</p> |

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| <p>natural events, past management, or lack of management, are returned to desired stocking levels and composition at the earliest practicable time as justified in management objectives.</p> | | <p>Using a combination of single tree selection and group selection, the restoration of depleted or overstocked stands is addressed. Examples of these stand treatments were observed during site visits and while touring the properties.</p> <p>Forest management planning for Cranberry Lake and Reed Plantation emphasizes the importance of employing harvest strategies to address the desires of TCF to improve value of the standing timber, both financially and ecologically.</p> |
| <p>5.6.d. For NTFPs, calculation of quantitative sustained yield harvest levels is required only in cases where products are harvested in significant commercial operations or where traditional or customary use rights may be impacted by such harvests. In other situations, the forest owner or manager utilizes available information, and new information that can be reasonably gathered, to set harvesting levels that will not result in a depletion of the non-timber growing stocks or other adverse effects to the forest ecosystem.</p> | <p>C</p> | <p>Other than forest carbon on the North Coast FMUs, there is no commercial enterprise for NTFPs on TCF properties.</p> |
| <p>P6 Forest management shall conserve biological diversity and its associated values, water resources, soils, and unique and fragile ecosystems and landscapes, and, by so doing, maintain the ecological functions and the integrity of the forest.</p> | | |
| <p>C6.1. Assessments of environmental impacts shall be completed -- appropriate to the scale, intensity of forest management and the uniqueness of the affected resources - - and adequately integrated into management systems. Assessments shall include landscape level considerations as well as the impacts of on-site processing facilities. Environmental impacts shall be</p> | <p>NE</p> | <p>-</p> |

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| <p>assessed prior to commencement of site-disturbing operations.</p> | | |
| <p>C 6.2. Safeguards shall exist which protect rare, threatened and endangered species and their habitats (e.g., nesting and feeding areas). Conservation zones and protection areas shall be established, appropriate to the scale and intensity of forest management and the uniqueness of the affected resources. Inappropriate hunting, fishing, trapping, and collecting shall be controlled.</p> | <p>C</p> | <p>-</p> |
| <p>6.2.a. If there is a likely presence of RTE species as identified in Indicator 6.1.a then either a field survey to verify the species' presence or absence is conducted prior to site-disturbing management activities, or management occurs with the assumption that potential RTE species are present.</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>For the North Coast FMUs, the state natural heritage database is reviewed as part of the THP process; any listed species are assumed to be present. Prior to the commencement of any planned site-disturbing activity, surveys are conducted to determine the presence of any RTE species. Botanical surveys are conducted by trained local botanists who work as contractors. Northern spotted owl (NSO) surveys are conducted prior to commencement of site-disturbing activities by trained survey crews.</p> <p>For Cranberry Lake, a survey was conducted during the development of the Forest Management Plan. Property has been in forest management for an extensive period of time. RTE are not present on property. Currently, a conservation easement is being developed for the property. RTE will be reviewed during this process.</p> <p>For Reed Plantation, a survey was conducted on the property during 2005-2007 by the Maine Natural Areas Program. Property has been in forest management for an extensive period of time. RTE are not present on property</p> |
| <p>6.2.b. When RTE species are present or assumed to be present, modifications in management are made in order to</p> | <p>C</p> | <p>Several examples of modifications in management to protect or enhance RTE species were observed during the field audit. These included fisheries</p> |

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| <p>maintain, restore or enhance the extent, quality and viability of the species and their habitats.</p> <p><i>Conservation zones and/or protected areas</i> are established for RTE species, including those S3 species that are considered rare, where they are necessary to maintain or improve the short and long-term viability of the species. Conservation measures are based on relevant science, guidelines and/or consultation with relevant, independent experts as necessary to achieve the conservation goal of the Indicator.</p> | | <p>habitat enhancement (Site 6), protection zone for the rare white flowered rein orchid (Site 20), and habitat for the threatened California red-legged frog (Site 22).</p> <p>Based on the results of NSO surveys described in 6.2.a, TCF has mapped nesting sites and activity centers on the North Coast FMUs. The sites are protected spatially and temporally. NSO activity centers were observed by auditors on maps, and one such area was verified on the ground in the Big River Forest (see notes for Site 18).</p> <p>Field visits confirmed protection for other detected RTE species during timber harvesting, such salmonid streamside buffer protection measures mandated by the California FPA Rules.</p> <p>For Cranberry Lake and Reed Plantation, modifications in management to protect or enhance RTE species would be implemented if identified during the planning for operations. These included road improvement projects, HCV management and monitoring, and harvest boundary adjustments.</p> |
| <p>6.2.c. For medium and large public forests (e.g. state forests), forest management plans and operations are designed to meet species' recovery goals, as well as landscape level biodiversity conservation goals.</p> | <p>NA</p> | <p>TCF is not a public forest so this indicator is not applicable.</p> |
| <p>6.2.d. Within the capacity of the forest owner or manager, hunting, fishing, trapping, collecting and other activities are controlled to avoid the risk of impacts to vulnerable species and communities (See Criterion 1.5).</p> | <p>C</p> | <p>Public access to and use of the North Coast FMUs is limited to hiking by permit only and occasionally woodcutting. The FME has one dedicated patrol staff to provide security on the North Coast.</p> <p>CA Department of Fish & Wildlife is the regulatory agency charged with control of wildlife and plant species to avoid the risk to vulnerable species and communities, and TCF works closely with the agency to achieve this goal.</p> <p>The major access points to Cranberry Lake and Reed Plantation are controlled with a private gate (TCF</p> |

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| | | <p>employees have keys). Other access points are not controlled.</p> <p>State and local law enforcement personnel can be expected to respond to any calls related to illegal activities that threaten people on the forest or RTE species.</p> |
| <p>C6.3. Ecological functions and values shall be maintained intact, enhanced, or restored, including: a) Forest regeneration and succession. b) Genetic, species, and ecosystem diversity. c) Natural cycles that affect the productivity of the forest ecosystem.</p> | C | - |
| <p>6.3.a.1. The forest owner or manager maintains, enhances, and/or restores under-represented <i>successional</i> stages in the FMU that would naturally occur on the types of sites found on the FMU. Where old growth of different community types that would naturally occur on the forest are under-represented in the landscape relative to natural conditions, a portion of the forest is managed to enhance and/or restore old growth characteristics.</p> | C | <p>On the North Coast FMUs, one of the central goals of TCF’s management is to accelerate a late seral successional stage, which is underrepresented on the landscape. This is accomplished through their focus on selection silviculture.</p> <p>To create late seral stages, several areas on the FMUs have restrictions on harvests, including in the Ecological Reserve on the Garcia River parcel with a conservation easement held by TNC. Upper diameter limits for harvest are in place, too. Current cut restrictions are no-cuts on redwood over 48 inches, Douglas-fir over 38 inches, and old growth. Other forest communities that receive special considerations include oak trees, red alder trees, grasslands and riparian communities, among others.</p> <p>For the Cranberry Lake and Reed Plantation FMUs, the management emphasizes the importance of the surrounding landscape in setting goals. The parcels are in a matrix of lands with a long history of active forest harvesting; TCF’s goal is to enhance the abundance and quality of older-aged stands.</p> |
| <p>6.3.a.2. When a <i>rare ecological community</i> is present, modifications are made in both the management plan and its implementation in order to maintain, restore or enhance the</p> | C | <p>Management of the North Coast FMUs includes numerous examples of rare ecological community management to maintain, restore, or enhance the viability of forest communities. Among others, these include oak retention, red alder retention,</p> |

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| <p>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>grasslands, ecological reserves, riparian buffers along fish and non-fish bearing streams (buffers in the ecological reserve are larger than required by state regulation or FSC), road improvements to reduce impacts, stream restoration to provide additional spawning areas, in-stream large woody debris installments, and NSO habitat protections.</p> <p>Rare ecological communities identified on the forest have typically been categorized as HCVFs, e.g., pygmy forest (Site 17) and oak woodlands. These areas are not managed except as needed to maintain the HCV values.</p> <p>Natural resource inventory report has been conducted for Reed Plantation and Cranberry Lake using available databases and experts from state agencies. Assistance has been received in identifying and protecting significant natural communities. These areas are described in the management plans and are protected on the ground. TCF retains wider buffers in riparian zones than required. Reed Plantation is in a conservation easement overseen by the Forest Society of Maine. Interview confirmed no issues with management practices.</p> |
| <p>6.3.a.3. When they are present, management maintains the area, structure, composition, and processes of all <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</p> | <p>NA</p> | <p>No type 1 or type 2 old growth stands are present on the North Coast FMUs. Individual scattered old growth trees are not harvested. TCF has a no-cut policy on all old growth stands and trees on the North Coast properties.</p> <p>There are also no old growth stands on the Cranberry Lake and Reed Plantation FMUs, as confirmed in interviews with staff and contractors and a review of inventory information.</p> |

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| <p>maintain the ecological values associated with the stand, including old growth attributes (e.g., remove exotic species, conduct controlled burning, and thinning from below in dry forest types when and where restoration is appropriate).</p> <p>Type 2 Old Growth is protected from harvesting to the extent necessary to maintain the area, structures, and functions of the stand. Timber harvest in Type 2 old growth must maintain old growth structures, functions, and components including individual trees that function as refugia (see Indicator 6.3.g).</p> <p>On public lands, old growth is protected from harvesting, as well as from other timber management activities, except if needed to maintain the values associated with the stand (e.g., remove exotic species, conduct controlled burning, and thinning 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> <p>Old growth forests comprise a significant portion of the tribal ownership.</p> <p>A history of forest stewardship by the tribe exists.</p> | | |
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| <p>High Conservation Value Forest attributes are maintained.</p> <p>Old-growth structures are maintained.</p> <p>Conservation zones representative of old growth stands are established.</p> <p>Landscape level considerations are addressed.</p> <p>Rare species are protected.</p> | | |
| <p>6.3.b. To the extent feasible within the size of the ownership, particularly on larger ownerships (generally tens of thousands or more acres), management maintains, enhances, or restores habitat conditions suitable for well-distributed populations of animal species that are characteristic of forest ecosystems within the landscape.</p> | C | <p>On the North Coast, TCF’s management focus is restoring habitat conditions associated with late seral species. Their efforts to maintain, enhance, and restore such habitat conditions are exemplary.</p> <p>The Cranberry Lake and Reed Plantation FMUs were purchased and are being managed by TCF as part of a larger effort to establish appropriate ownership, protection, and management of an entire landscape.</p> |
| <p>6.3.c. Management maintains, enhances and/or restores the plant and wildlife habitat of <i>Riparian Management Zones (RMZs)</i> to provide:</p> <ul style="list-style-type: none"> habitat for aquatic species that breed in surrounding uplands; habitat for predominantly terrestrial species that breed in adjacent <i>aquatic habitats</i>; habitat for species that use riparian areas for feeding, cover, and travel; habitat for plant species associated with riparian areas; and, stream shading and inputs of wood and leaf litter into the adjacent aquatic ecosystem. | C | <p>TCF actively manages riparian areas to enhance habitat features on the North Coast FMUs. Examples include active placement of large woody debris in streams to increase the number of pools and fish habitats (e.g., Site 6).</p> <p>Several examples of projects to maintain, enhance and/or restore the riparian vegetation and the fish and wildlife habitat of riparian areas were reviewed during the field audit. Examples visited included buffers and maintenance of canopy cover on streams, large woody-debris installment, stream crossing enhancement, tanoak removal, protection of large redwood trees, and protection of wildlife snags.</p> <p>Riparian zones are in place surrounding wetland areas in Cranberry Lake and Reed Plantation. Site visits confirmed presence of RMZs at multiple locations. Buffers were respected on RMZs with boundaries flagged and/or painted prior to harvesting. In most situations, buffers exceed requirements.</p> |

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| <p>Stand-scale Indicators</p> <p>6.3.d Management practices maintain or enhance plant species composition, distribution and frequency of occurrence similar to those that would naturally occur on the site.</p> | <p>C</p> | <p>On the North Coast, TCF’s management goals include maintaining and enhancing the natural distribution of plant species. Uneven-age management is consistent with the natural disturbance regimes for the coastal redwood region as described in TCF’s forest management plan. Tanoak is controlled only as much as necessary to reestablish conifer dominance on sites that were historically conifer-dominated.</p> <p>Management goals for Cranberry Lake and Reed Plantation include maintaining the natural distribution of plant species on the site. Field sites visited demonstrate that these goals are being met.</p> |
| <p>6.3.e. When planting is required, a local source of known provenance is used when available and when the local source is equivalent in terms of quality, price and productivity. The use of non-local sources shall be justified, such as in situations where other management objectives (e.g. disease resistance or adapting to climate change) are best served by non-local sources. <i>Native species</i> suited to the site are normally selected for regeneration.</p> | <p>C</p> | <p>For the North Coast FMUs, a limited amount of planting is done when natural regeneration is insufficient. Planting stock is from appropriate local seed zones.</p> <p>For Cranberry Lake and Reed Plantation, planting is not done. All regeneration is natural as observed in the field and confirmed during interviews.</p> |
| <p>6.3.f. Management maintains, enhances, or restores habitat components and associated stand structures, in abundance and distribution that could be expected from naturally occurring processes. These components include:</p> <p>a) large live trees, live trees with decay or declining health, <i>snags</i>, and well-distributed coarse down and dead woody material. <i>Legacy trees</i> where present are not harvested; and</p> <p>b) vertical and horizontal complexity.</p> | <p>C</p> | <p>The use of single-tree selection and group selection on no more than 20% of the North Coast FMUs provides habitat components and stand structures that could be expected from naturally-occurring processes. Large live trees, legacy trees, and snags are maintained across the landscape, as confirmed by auditors; these are generally marked with a “W” in the field to provide retention during harvest. Structural diversity is maintained by retaining trees with wildlife habitat features, such as large limbed trees. Legacy trees, as defined by the FSC, are not harvested.</p> <p>For Cranberry Lake and Reed Plantation, large live trees, legacy trees, and snags are maintained across</p> |

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| <p>Trees selected for <i>retention</i> are generally representative of the dominant species found on the site.</p> | | <p>the landscape. These are generally marked with a “W” in the field to provide retention during harvest. Structural diversity is maintained by retaining trees with wildlife habitat features, such as large limbed trees. Legacy trees, as defined by the FSC, are not harvested.</p> |
| <p>6.3.g.1 In the Southeast, Appalachia, Ozark-Ouachita, Mississippi Alluvial Valley, and Pacific Coast Regions, when <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>NA</p> | <p>On the North Coast, even-age management is limited to 1-acre group selection cuts in planted areas in existence when the property was acquired by TCF. Currently, the age of these stands requires pre-commercial thinning as the primary management technique.</p> <p>Even-age methods such as clearcutting, seed tree removal, and shelterwood removal are not modeled for the approved Option A on the North Coast. However, these even-age systems may be used in the event of severe damage resulting from natural causes such as fire or wind to capture mortality and regenerate the site.</p> <p>For Cranberry Lake and Reed Plantation, the management plan emphasizes the importance of retention in even-age silviculture. Only small areas were observed to be even-aged management. Cranberry Lake and Reed Plantation primarily use uneven aged management.</p> |
| <p>Indicator 6.3.g.1.a (PC only) Within harvest openings larger than 6 acres, 10-30% of pre-harvest basal area is retained. The levels of green-tree retention depend on such factors as: opening size, legacy trees, adjacent riparian zones, slope stability, upslope management, presence of critical refugia, and extent and intensity of harvesting across the FMU. Retention</p> | <p>NA</p> | <p>On the North Coast, no harvest openings of this size occur. The largest gaps are limited to 1 acre as part of group selections. Therefore, this indicator is not applicable.</p> |

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| <p>is distributed as clumps and dispersed individuals, appropriate to site conditions. Retained trees comprise a diversity of species and size classes, which includes large and old trees. Regeneration harvest blocks in even-aged stands average 40 acres or less. No individual block is larger than 60 acres.</p> | | |
| <p>Indicator 6.3.g.1.b (PC only) Even-aged silviculture may be employed where: 1) native species require openings for regeneration or vigorous young-stand development, or 2) it restores the native species composition, or 3) it is needed to restore structural diversity in a landscape lacking openings while maintaining connectivity of older intact forests.</p> <p><i>Guidance: In some dry regions, retaining approximately 10 tons of debris per acre may be sufficient. In wetter regions, retaining 20 tons of debris per acre may be sufficient. Debris is well distributed spatially and by size and decay class, with a goal of at least 4 large pieces (approximately 20" diameter x 15' length) per acre. Three to 10 snags per acre (averaged over 10 acres) are maintained or recruited. Snags are well represented by size, species, and decay class.</i></p> | <p>NA</p> | <p>On the North Coast, gaps are limited to 1 acre in size, which are essentially group selection cuts. Therefore, this indicator is not applicable.</p> |
| <p>Indicator 6.3.g.1.c (PC only) Where necessary to protect against wind throw and to maintain microclimate, green trees and other vegetation are retained around snags, down woody debris, and other retention components.</p> | <p>C</p> | <p>Snags are well protected on the North Coast. TCF's limited group openings are unlikely to result in windthrow effects, and no such damage was seen during site visits.</p> |

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| <p>Indicator 6.3.g.1.d (PC only) Native hardwoods and understory vegetation are retained as needed to maintain and/or restore the natural mix of species and forest structure.</p> | <p>C</p> | <p>TCF protects and encourages the presence of native hardwoods for wildlife purposes on the North Coast. Evidence includes a targeted approach to pesticide use that maintains most competing hardwood species.</p> |
| <p>Indicator 6.3.g.1.e (PC only) If regeneration harvest ages do not approach <i>culmination of mean annual increment</i> (CMAI), retention approaches the upper end of the range required in Indicator 6.3.h.1.a (above).</p> | <p>NA</p> | <p>This indicator pertains more so to even-age management than to the individual tree and small group selection cuts that occur on TCF’s North Coast properties, so this indicator is not applicable.</p> |
| <p>Indicator 6.3.g.1.f (PC only) No logical logging unit adjacent to a logged even-aged regeneration unit may be harvested using an even-aged regeneration method unless/until the prior even-aged regeneration unit is adequately stocked by a stand of trees in which the dominant and co-dominant trees average at least five feet tall and three years of age from the time of establishment on the site, either by planting or by natural regeneration. If the requirement to achieve adequate stocking is to be met with trees that were present at the time of harvest, there shall be a period not less than five years following the completion of operations before an adjacent even-aged regeneration harvest may occur.</p> | <p>NA</p> | <p>This indicator pertains more so to large, even-aged cuts than to the individual tree and small group selection cuts that occur on TCF’s North Coast properties, so this indicator is not applicable.</p> |
| <p>6.3.g.2 Under very limited situations, the landowner or manager has the option to develop a qualified plan to allow minor departure from the opening size limits described in Indicator 6.3.g.1. A qualified plan:</p> <ol style="list-style-type: none"> 1. Is developed by qualified experts in ecological and/or related fields | <p>NA</p> | <p>TCF is not pursuing this option for any of its FSC-certified FMUs, so this indicator is not applicable.</p> |

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| <p>(wildlife biology, hydrology, landscape ecology, forestry/silviculture).</p> <p>2. Is based on the totality of the <i>best available information</i> including peer-reviewed science regarding natural disturbance regimes for the FMU.</p> <p>3. Is spatially and temporally explicit and includes maps of proposed openings or areas.</p> <p>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.</p> <p>5. Is reviewed by independent experts in wildlife biology, hydrology, and landscape ecology, to confirm the preceding findings.</p> | | |
| <p>6.3.h. The forest owner or manager assesses the risk of, prioritizes, and, as warranted, develops and implements a strategy to prevent or control <i>invasive species</i>, including:</p> <p>a method to determine the extent of invasive species and the degree of threat to native species and ecosystems;</p> <p>implementation of management practices that minimize the risk of invasive establishment, growth, and spread;</p> <p>eradication or control of established invasive populations when feasible;</p> <p>and,</p> <p>monitoring of control measures and management practices to assess their effectiveness in preventing or controlling invasive species.</p> | <p>C</p> | <p>TCF has invasive species management plans for the North Coast FMUs that includes detection, control and monitoring. Invasive species management is done primarily through herbicide use, focused on areas where invasives can be contained. The main invasives targeted are jubata grass (<i>Cortaderia jubata</i>), French broom (<i>Genista monspessulana</i>), bull thistle (<i>Cirsium vulgare</i>), and Italian thistle (<i>Carduus pycnocephalus</i>). No herbicides are used on the Big River and Salmon Creek FMU.</p> <p>For Cranberry Lake and Reed Plantation, the strategy for dealing with invasive species is documented in the Working Forest Fund Guidelines Digest. A management goal for the parcel is to combat invasive species. Fortunately, only a few instances of invasive plants have been documented on or near the ownership. A small area of invasive plants were identified on Cranberry Lake. The area was documented, and The Nature Conservancy notified for treatment. Treatment and area are documented.</p> |

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| <p>6.3.i. In applicable situations, the forest owner or manager identifies and applies site-specific fuels management practices, based on: (1) natural fire regimes, (2) risk of wildfire, (3) potential economic losses, (4) public safety, and (5) applicable laws and regulations.</p> | <p>C</p> | <p>On the North Coast, fuels management practices are generally limited to treatment of slash following logging. Wildfires are uncommon in the redwood belt of Northern California because of the relatively wet conditions, although they do occur occasionally, especially during extreme drought periods.</p> <p>In 2016, Mendocino County has passed an ordinance declaring trees intentionally killed and left standing as a public nuisance and establishing a fine for violations. This regulation could impact the application of herbicide using the hack-and-squirt method to tanoaks on the North Coast FMUs, although it is not clear that this would constitute a violation.</p> <p>Fires are uncommon and fuel management is rarely addressed in northern New England, including on the Cranberry Lake and Reed Plantation FMUs.</p> |
| <p>C6.4. Representative samples of existing ecosystems within the landscape shall be protected in their natural state and recorded on maps, appropriate to the scale and intensity of operations and the uniqueness of the affected resources.</p> | <p>C</p> | <p>-</p> |
| <p>6.4.a. The forest owner or manager documents the ecosystems that would naturally exist on the FMU, and assesses the adequacy of their representation and protection in the <i>landscape</i> (see Criterion 7.1). The assessment for medium and large forests include some or all of the following: a) <i>GAP analyses</i>; b) collaboration with state natural heritage programs and other public agencies; c) regional, landscape, and watershed planning efforts; d) collaboration with universities and/or local conservation groups.</p> | <p>C</p> | <p>The FME has developed much of its North Coast program based on regional ecologically-focused assessments and plans. <i>Conservation Prospects for the North Coast: A Review and Analysis of Existing Conservation Plans, Land Use Trends and Strategies for Conservation on the North Coast of California</i>, prepared by the FME in August 2005, provides a collection and synthesis of conservation plans on the North Coast. The accompanying report, <i>Program on High Conservation Value Forests, Imperiled Species, and Representative Sample Areas</i>, was updated in 2018 and includes a review of regional ecologically-focused assessments and plans.</p> <p>For Cranberry Lake and Reed Plantation, forest management plan has included the landscape</p> |

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| <p>For an area that is not located on the FMU to qualify as a Representative Sample Area (RSA), it should be under permanent protection in its natural state.</p> | | <p>context of the forest ecosystem, including communities that would naturally exist on the FMU.</p> |
| <p>6.4.b. Where existing areas within the landscape, but external to the FMU, are not of adequate protection, size, and configuration to serve as representative samples of existing ecosystems, forest owners or managers, whose properties are conducive to the establishment of such areas, designate ecologically viable RSAs to serve these purposes.</p> <p>Large FMUs are generally expected to establish RSAs of purpose 2 and 3 within the FMU.</p> | <p>C</p> | <p>As described in <i>Conservation Prospects for the North Coast: A Review and Analysis of Existing Conservation Plans, Land Use Trends and Strategies for Conservation on the North Coast of California</i> (see discussion in 6.4.a) and in the updated reassessment, <i>Program on High Conservation Value Forests, Imperiled Species, and Representative Sample Areas</i>, the FME has concluded that because of the widespread protected nature of lands in the region, the regulatory system restricting land use change and harvest practices, and the existing pattern of habitat conditions and ecological processes present on the landscape, designating RSAs on their property is unnecessary and would not be ecologically beneficial.;</p> <p>No RSAs have been identified on the Cranberry Lake or Reed Plantation FMUs.</p> |
| <p>6.4.c. Management activities within RSAs are limited to low impact activities compatible with the protected RSA objectives, except under the following circumstances:</p> <p>a) harvesting activities only where they are necessary to restore or create conditions to meet the objectives of the protected RSA, or to mitigate conditions that interfere with achieving the RSA objectives; or</p> <p>b) road-building only where it is documented that it will contribute to minimizing the overall environmental impacts within the FMU and will not jeopardize the purpose for which the RSA was designated.</p> | <p>NA</p> | <p>No RSAs are designated, so this indicator is not applicable.</p> |

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| <p>6.4.d. The RSA assessment (Indicator 6.4.a) shall be periodically reviewed and if necessary updated (at a minimum every 10 years) in order to determine if the need for RSAs has changed; the designation of RSAs (Indicator 6.4.b) is revised accordingly.</p> | <p>C</p> | <p>The FME has developed much of its North Coast program based on regional ecologically-focused assessments and plans. <i>Conservation Prospects for the North Coast: A Review and Analysis of Existing Conservation Plans, Land Use Trends and Strategies for Conservation on the North Coast of California</i>, prepared by the FME in August 2005, provides a collection and synthesis of conservation plans on the North Coast. The accompanying report, <i>Program on High Conservation Value Forests, Imperiled Species, and Representative Sample Areas</i>, was updated in 2018 as part of FME’s response to a Minor CAR issued in 2017 (see Finding 2017.3). Following a review of regional conservation plans, TCF maintains its previous position that because of the widespread protected nature of the region, the extensive regulatory system restricting land use change and harvest practices, and the existing pattern of habitat conditions and ecological processes present on the landscape, the designation of additional RSAs is unnecessary and would not be ecologically beneficial. The finding was closed this year.</p> <p>On Cranberry Lake, a survey conducted during the development of the Forest Management Plan. Property has been in forest management for an extensive period of time. Ongoing assessment is conducted prior to management activities. RTE are not present on property. Currently, a conservation easement is being developed for the property. RTE will be reviewed during this process.</p> <p>On Reed Plantation, a survey was conducted on the property during 2005-2007 by the Maine Natural Areas Program. Property has been in forest management for an extensive period of time. Ongoing assessment is conducted prior to management activities. RTE are not present on property. Property has been owned less than 10 years.</p> |
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| <p>6.4.e. Managers of large, contiguous public forests establish and maintain a network of representative protected areas sufficient in size to maintain species dependent on interior core habitats.</p> | <p>NA</p> | <p>TCF is not a public forest, so this indicator is not applicable.</p> |
| <p>C6.5. Written guidelines shall be prepared and implemented to control erosion; minimize forest damage during harvesting, road construction, and all other mechanical disturbances; and to protect water resources.</p> | <p>C</p> | <p>-</p> |
| <p>6.5.a. The forest owner or manager has written guidelines outlining conformance with the Indicators of this Criterion.</p> | <p>C</p> | <p>TCF has written road management policies contained in its policy digest for the North Coast properties.</p> <p>Strategy for dealing with erosion control is documented in the Working Forest Fund Guidelines Digest.</p> |
| <p>6.5.b. Forest operations meet or exceed Best Management Practices (BMPs) that address components of the Criterion where the operation takes place.</p> | <p>C</p> | <p>On the North Coast FMUs, field inspections overall showed compliance with BMPs (e.g., Sites 10, 13, 16, and 21). Interviews with FME staff and contracted operators demonstrate a thorough knowledge of proper BMP installation.</p> <p>For Cranberry Lake and Reed Plantation, review of monitoring reports confirm BMPs are met during operations. Field inspections showed compliance with best management practices.</p> |
| <p>6.5.c. Management activities including site preparation, harvest prescriptions, techniques, timing, and equipment are selected and used to protect soil and water resources and to avoid erosion, landslides, and significant soil disturbance. Logging and other activities that significantly increase the risk of landslides are excluded in areas where risk of landslides is high. The following actions are addressed:</p> | <p>C</p> | <p>On the North Coast, field inspections showed overall compliance with this indicator. Slash was often lopped and scattered onsite to protect from soil erosion. No rutting or compaction was observed at field sites. Cable yarding is used on steeper slopes, which reduces soil impacts associated with logging. No prescribed fire is used.</p> <p>For Cranberry Lake and Reed Plantation, field inspections showed timing of activities and matching of contractors equipment to ground conditions meet requirement.</p> |

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| <p>Slash is concentrated only as much as necessary to achieve the goals of site preparation and the reduction of fuels to moderate or low levels of fire hazard.</p> <p>Disturbance of topsoil is limited to the minimum necessary to achieve successful regeneration of species native to the site.</p> <p>Rutting and compaction is minimized.</p> <p>Soil erosion is not accelerated.</p> <p>Burning is only done when consistent with natural disturbance regimes.</p> <p>Natural ground cover disturbance is minimized to the extent necessary to achieve regeneration objectives.</p> <p>Whole tree harvesting on any site over multiple rotations is only done when research indicates soil productivity will not be harmed.</p> <p>Low impact equipment and technologies is used where appropriate.</p> | | |
| <p>6.5.d. The transportation system, including design and placement of permanent and temporary haul roads, skid trails, recreational trails, water crossings and landings, is designed, constructed, maintained, and/or reconstructed to reduce short and long-term environmental impacts, habitat fragmentation, soil and water disturbance and cumulative adverse effects, while allowing for customary uses and use rights. This includes: access to all roads and trails (temporary and permanent), including recreational trails, and off-road travel,</p> | <p>C</p> | <p>TCF’s transportation system on the North Coast is in excellent shape. TCF works to minimize road density and closes unnecessary roads with the goal of making them “hyrdologically invisible,” meaning that the fill is pulled up to make them impassable, crossings are removed, and tree planting is done. The organization is also making a strong push to locate new roads in upland areas rather than in sensitive riparian zones as previous owners had done. All roads are gated to control vehicle use and damage to the road network. Two OBS pertaining to the road system were closed as part of this year’s audit (see Findings 2017.2 and 2017.4).</p> <p>For Cranberry Lake and Reed Plantation, site visits confirmed that TCF’s transportation network met the requirements in this indicator.</p> |

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| <p>is controlled, as possible, to minimize ecological impacts;</p> <p>road density is minimized;</p> <p>erosion is minimized;</p> <p>sediment discharge to streams is minimized;</p> <p>there is free upstream and downstream passage for aquatic organisms;</p> <p>impacts of transportation systems on wildlife habitat and migration corridors are minimized;</p> <p>area converted to roads, landings and skid trails is minimized;</p> <p>habitat fragmentation is minimized;</p> <p>unnecessary roads are closed and rehabilitated.</p> | | |
| <p>6.5.e.1. In consultation with appropriate expertise, the forest owner or manager implements written <i>Streamside Management Zone (SMZ) buffer</i> management guidelines that are adequate for preventing environmental impact, and include protecting and restoring water quality, hydrologic conditions in rivers and stream corridors, wetlands, vernal pools, seeps and springs, lake and pond shorelines, and other hydrologically sensitive areas. The guidelines include vegetative buffer widths and protection measures that are acceptable within those buffers.</p> <p>In the Appalachia, Ozark-Ouachita, Southeast, Mississippi Alluvial Valley, Southwest, Rocky Mountain, and Pacific Coast regions, there are requirements for minimum SMZ</p> | <p>C</p> | <p>The California FPA Rules include explicit requirements for designation and protection of SMZs on the North Coast FMUs; TCF's internal requirements are generally even more restrictive. SMZ buffers are delineated and implemented through consultation with CAL FIRE, fisheries biologists, and other experts as required. Field visits confirm implementation of SMZ buffers (e.g., Sites 16 and 20).</p> <p>For Cranberry Lake and Reed Plantation, SMZs were sufficient per site visits.</p> |

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| <p>widths and explicit limitations on the activities that can occur within those SMZs. These are outlined as requirements in Appendix E.</p> | | |
| <p>6.5.e.1.a (PC only) For Category A streams, and for lakes and wetlands larger than one acre, an inner buffer zone is maintained. The inner buffer is at least 50 feet wide (slope distance) from the active high water mark (on both sides) of the stream channel and increases depending on forest type, slope stability, steepness, and terrain. Management activities in the inner buffer:</p> <ul style="list-style-type: none"> maintains or restore the native vegetation are limited to single-tree selection silviculture retain and allows for recruitment of large live and dead trees for shade and stream structure retain canopy cover and shading sufficient to moderate fluctuations in water temperature, to provide habitat for the full complement of aquatic and terrestrial species native to the site, and maintain or restore riparian functions exclude use of heavy equipment, except to cross streams at designated places, or where the use of such equipment is the lowest impact alternative avoid disturbance of mineral soil; where disturbance is unavoidable, mulch and seed are applied before the rainy season | <p>C</p> | <p>On the North Coast, TCF has a 50-foot no harvest buffer on Class 1 watercourses (equivalent to Category A).</p> |

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| <p>avoid the spread of pathogens and noxious weeds</p> <p>avoid road construction and reconstruction.</p> | | |
| <p>6.5.e.1.b (PC only) For Category A streams, and for lakes and wetlands larger than one acre, an outer buffer zone is maintained. This buffer extends from the outer edge of the inner buffer zone to a distance of at least 150 feet from the edge of the active high water mark (slope distance, on both sides) of the stream channel. In this outer buffer, harvest occurs only where:</p> <p>single-tree or group selection silviculture is used</p> <p>post harvest canopy cover maintains shading sufficient to moderate fluctuations in water temperature, provide habitat for the full complement of aquatic and terrestrial species native to the site, and maintain or restore riparian functions</p> <p>new road construction is avoided and reconstruction enhances riparian functions and reduces sedimentation;</p> <p>disturbance of mineral soil is avoided; where disturbance is unavoidable, mulch and seed are applied before the rainy season</p> | <p>C</p> | <p>On the North Coast, TCF's general management practices are limited to single tree or group selection. This indicator for Category A streams is met by default for harvests within the outer buffer zone (where only single-tree selection occurs currently).</p> |
| <p>6.5.e.1.c (PC only) For Category B streams, a 25-foot (slope distance) inner buffer is created and managed according to provisions for inner buffers for Category A. A 75-foot (slope distance) outer buffer (for a total buffer of 100 feet) is created and</p> | <p>C</p> | <p>For Category B streams on the North Coast, the interior buffer is within a no harvest area, and the outer buffer falls within a single tree selection area.</p> |

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| <p>managed according to provisions for outer buffer for Category A.</p> | | |
| <p>6.5.e.1.d (PC only) For Category C streams, and for lakes and wetlands smaller than one acre, a buffer zone 75 feet wide (on both sides of the stream) is established that constrains management activities to those that are allowed in outer buffer zones of Category A streams.</p> | <p>C</p> | <p>For Category C streams on the North Coast, buffer requirements are met through use of single tree selection.</p> |
| <p>6.5.e.1.e (PC only) For Category D streams, management:</p> <ul style="list-style-type: none"> maintains root strength and stream bank and channel stability recruits coarse wood to the stream system minimizes management-related sediment transport to the stream system. <p>Streams, vernal pools, lakes, wetlands, seeps, springs, and associated riparian areas are managed to maintain and/or restore hydrologic processes, water quality, and habitat characteristics (see NMFS (1996); state water quality standards; Karr (1981) which may include: the capacity for water to infiltrate the soil; habitat for riparian species; moderating water temperature; controlling sedimentation; clean gravel for spawning; physical structures to protect the integrity of the stream channel; including pools used by anadromous fish.</p> <p>Forest owners or managers retain and recruit sufficient large, green trees; snags; understory vegetation; down</p> | <p>C</p> | <p>For Category D streams on the North Coast, buffer requirements met through use of single tree selection.</p> |

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| <p>logs; and other woody debris in riparian zones to provide shade, erosion control, and in-channel structures.</p> | | |
| <p>6.5.e.2. Minor variations from the stated minimum SMZ widths and layout for specific stream segments, wetlands and other water bodies are permitted in limited circumstances, provided the forest owner or manager demonstrates that the alternative configuration maintains the overall extent of the buffers and provides equivalent or greater environmental protection than FSC-US regional requirements for those stream segments, water quality, and aquatic species, based on site-specific conditions and the best available information. The forest owner or manager develops a written set of supporting information including a description of the riparian habitats and species addressed in the alternative configuration. The CB must verify that the variations meet these requirements, based on the input of an independent expert in aquatic ecology or closely related field.</p> | <p>NA</p> | <p>No variations have been requested for any of TCF's FMUs, so this indicator is not applicable.</p> |
| <p>6.5.f. Stream and wetland crossings are avoided when possible. Unavoidable crossings are located and constructed to minimize impacts on water quality, hydrology, and fragmentation of <i>aquatic habitat</i>. Crossings do not impede the movement of aquatic species. Temporary crossings are restored to original hydrological conditions when operations are finished.</p> | <p>C</p> | <p>Stream crossings on the North Coast were inspected and found to be in overall compliance with BMPs (e.g., Sites 7, 13, and 21). On the Cranberry Lake and Reed Plantation FMUs, stream crossings were inspected and found to be in overall compliance with BMPs.</p> |

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| <p>6.5.g. Recreation use on the FMU is managed to avoid negative impacts to soils, water, plants, wildlife and wildlife habitats.</p> | <p>C</p> | <p>On the North Coast, recreation is managed through a permit system. A dedicated patrol officer helps to enforce the limited recreation and ensure that recreation does not negatively impact soils, water, plants, fisheries and wildlife, and wildlife habitats.</p> <p>For Cranberry Lake and Reed Plantation, the parcels are generally open to recreation throughout the year, with restricted motorized access.</p> |
| <p>6.5.h. Grazing by domesticated animals is controlled to protect in-stream habitats and water quality, the species composition and viability of the riparian vegetation, and the banks of the stream channel from erosion.</p> | <p>NA</p> | <p>No domestic grazing occurs on any of TCF's properties, so this indicator is not applicable.</p> |
| <p>C6.6. Management systems shall promote the development and adoption of environmentally friendly non-chemical methods of pest management and strive to avoid the use of chemical pesticides. World Health Organization Type 1A and 1B and chlorinated hydrocarbon pesticides; pesticides that are persistent, toxic or whose derivatives remain biologically active and accumulate in the food chain beyond their intended use; as well as any pesticides banned by international agreement, shall be prohibited. If chemicals are used, proper equipment and training shall be provided to minimize health and environmental risks.</p> | <p>NE</p> | <p>-</p> |
| <p>C6.7. Chemicals, containers, liquid and solid non-organic wastes including fuel and oil shall be disposed of in an environmentally appropriate manner at off-site locations.</p> | <p>NE</p> | <p>-</p> |

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| <p>C6.8. Use of biological control agents shall be documented, minimized, monitored, and strictly controlled in accordance with national laws and internationally accepted scientific protocols. Use of genetically modified organisms shall be prohibited.</p> | <p>NE</p> | <p>-</p> |
| <p>C6.9. The use of exotic species shall be carefully controlled and actively monitored to avoid adverse ecological impacts.</p> | <p>NA</p> | <p>No exotic species are used by the FME, so this criterion and associated indicators are not applicable.</p> |
| <p>6.9.a. The use of <i>exotic species</i> is contingent on the availability of credible scientific data indicating that any such species is non-invasive and its application does not pose a risk to native biodiversity.</p> | <p>NA</p> | <p>-</p> |
| <p>6.9.b. If exotic species are used, their provenance and the location of their use are documented, and their ecological effects are actively monitored.</p> | <p>NA</p> | <p>-</p> |
| <p>6.9.c The forest owner or manager shall take timely action to curtail or significantly reduce any adverse impacts resulting from their use of exotic species</p> | <p>NA</p> | <p>-</p> |
| <p>C6.10. Forest conversion to plantations or non-forest land uses shall not occur, except in circumstances where conversion: a) Entails a very limited portion of the forest management unit; and b) Does not occur on High Conservation Value Forest areas; and c) Will enable clear, substantial, additional, secure, long-term conservation benefits across the forest management unit.</p> | <p>NE</p> | <p>-</p> |

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| <p>P7 A management plan -- appropriate to the scale and intensity of the operations -- shall be written, implemented, and kept up to date. The long-term objectives of management, and the means of achieving them, shall be clearly stated.</p> <p>This principle was not evaluated this year, and no findings were issued for any of the indicators in the principle.</p> | | |
| <p>P8 Monitoring shall be conducted -- appropriate to the scale and intensity of forest management -- to assess the condition of the forest, yields of forest products, chain of custody, management activities and their social and environmental impacts.</p> | | |
| <p>C8.1. The frequency and intensity of monitoring should be determined by the scale and intensity of forest management operations, as well as, the relative complexity and fragility of the affected environment. Monitoring procedures should be consistent and replicable over time to allow comparison of results and assessment of change.</p> | <p>NE</p> | <p>-</p> |
| <p>8.2. Forest management should include the research and data collection needed to monitor, at a minimum, the following indicators: a) yield of all forest products harvested, b) growth rates, regeneration, and condition of the forest, c) composition and observed changes in the flora and fauna, d) environmental and social impacts of harvesting and other operations, and e) cost, productivity, and efficiency of forest management.</p> | <p>C</p> | <p>-</p> |
| <p>8.2.a.1. For all commercially harvested products, an inventory system is maintained. The inventory system includes at a minimum: a) species, b) volumes, c) stocking, d) regeneration, and e) stand and forest composition and structure; and f) timber quality.</p> | <p>C</p> | <p>On the North Coast, inventory plots are established as part of TCF's forest carbon assessment. Data is collected on species, volume, general stand composition, regeneration, brush species, snags and course woody material, and timber quality. A carbon plot was observed by the auditors (see Site 15). Additionally, an inventory of timber is conducted approximately every 10 years when Option A, the primary harvest planning document, is updated.</p> |

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| | | <p>There are permanent plots on some forests that are re-measured every 10 years to assess forest growth. Pre- and post-harvest cruises are conducted for harvest sites. Inventory is updated at that time for the harvested areas.</p> <p>For Cranberry Lake and Reed Plantation, pre- and post-harvest cruises are conducted for harvest sites. Inventory is updated at that time for the harvested areas.</p> |
| <p>8.2.a.2. Significant, unanticipated removal or loss or increased vulnerability of forest resources is monitored and recorded. Recorded information shall include date and location of occurrence, description of disturbance, extent and severity of loss, and may be both quantitative and qualitative.</p> | <p>C</p> | <p>On the North Coast, unanticipated removal is accounted for in the forest inventory system and is monitored. In 2012, there was a 700-acre wildfire that resulted in removal of timber (the area was re-inventoried), but there have been no significant unanticipated removals since. TCF staff have a regular presence on the ground, so they can quickly detect, record, and monitor such losses.</p> <p>For Cranberry Lake and Reed Plantation, no such losses have occurred.</p> |
| <p>8.2.b The forest owner or manager maintains records of harvested timber and NTFPs (volume and product and/or grade). Records must adequately ensure that the requirements under Criterion 5.6 are met.</p> | <p>C</p> | <p>The FME keeps records of all harvested timber on the North Coast, including volume, product, and grade. For forest carbon (the only commercial NTFP on the parcels), meticulous records are kept of numerous metrics.</p> <p>The FME also keeps records of all harvested timber on Cranberry Lake and Reed Plantation, including volume, product, and grade. No NTFPs are harvested in commercial quantities.</p> |
| <p>8.2.c. The forest owner or manager periodically obtains data needed to monitor presence on the FMU of:</p> <p>Rare, threatened and endangered species and/or their <i>habitats</i>;</p> <p>Common and rare plant communities and/or habitat;</p> <p>Location, presence and abundance of invasive species;</p> | <p>C</p> | <p>On the North Coast, monitoring of RTE species occurs prior to harvest when such species have been identified as part of the THP process. The FME annually contracts NSO and rare plant surveys. Invasive species and control measures are monitored as part of the THP process. The Garcia River ERN is monitored by TNC. HCVF monitoring is recorded as part of FME’s annual review.</p> <p>For Cranberry Lake and Reed Plantation, reviews of sources of information on Threatened and Endangered Species are documented in</p> |

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| <p>Condition of protected areas, set-asides and buffer zones; High Conservation Value Forests (see Criterion 9.4).</p> | | <p>management plans. Old-growth forests are not present. The program relies on its “forestry digest” in general and on its FSC forest management certification program. Forester is aware of the need to query and review the State Natural Heritage dataset for any updates.</p> |
| <p>8.2.d.1. Monitoring is conducted to ensure that site specific plans and operations are properly implemented, environmental impacts of site disturbing operations are minimized, and that harvest prescriptions and guidelines are effective.</p> | <p>C</p> | <p>FME foresters are in regular communication with operators during active harvests. A forester drops by each active site at least twice a week, according to interviews with staff and contractors. These site visits serve to ensure that harvest plans are properly implemented, including harvest prescriptions and the installation of BMPs. Post-harvest review of volume harvested (e.g., post-harvest inventory) occurs by the forester administering the sale. Foresters also monitor harvested sites for regeneration and survival of any plantings, persistence of BMPs, longevity of snags, and other important environmental attributes.</p> |
| <p>8.2.d.2. A monitoring program is in place to assess the condition and environmental impacts of the forest-road system.</p> | <p>C</p> | <p>On the North Coast, the FME has conducted a road inventory of all forests. Per state law, any new road construction requires a 1600 permit and general discharge waiver, which essentially functions as a monitoring mechanism for the FME. Additionally, completed THPs have a mandatory 3-year monitoring requirement per state law. Security patrol personnel continuously monitor the road system conditions on the forests. After the first big rain even of the wet season or after major storms, FME personnel drive the roads to assess any damage needing repairs.</p> <p>For Cranberry Lake and Reed Plantation, in the course of normal duties the forester monitors the condition of the forest road system.</p> |
| <p>8.2.d.3. The landowner or manager monitors relevant socio-economic issues (see Indicator 4.4.a), including the social impacts of harvesting, participation in local economic opportunities (see Indicator 4.1.g), the</p> | <p>C</p> | <p>TCF documents the results of its social impacts monitoring as part of annual reports found on its web page. For example, North Coast Forest Conservation Initiative Annual Reports include economic indicators, such as number of contractors hired and local purchases made in a given year.</p> |

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| creation and/or maintenance of quality job opportunities (see Indicator 4.1.b), and local purchasing opportunities (see Indicator 4.1.e). | | |
| 8.2.d.4. Stakeholder responses to management activities are monitored and recorded as necessary. | C | TCF staff maintains logs of outreach and communication with the local public for each FMU, as well as documents any complaints or conflicts that arise. Based on interviews with stakeholders, TCF is well regarded in the local communities as a good forest steward and an important contributor to local economies. |
| 8.2.d.5. Where sites of cultural significance exist, the opportunity to jointly monitor sites of cultural significance is offered to tribal representatives (see Principle 3). | C | On the North Coast, no sites of cultural significance have yet been found. While planning a THP, the lead forester consults with tribes who historically occupied the area; this is a requirement of the California FPA Rules if an archeological site is found. For Cranberry Lake and Reed Plantation, no sites of cultural significance have yet been found; if discovered, foresters will communicate with tribal representatives. |
| 8.2.e. The forest owner or manager monitors the costs and revenues of management in order to assess productivity and efficiency. | C | All costs and revenues, including those for each harvest unit and other management activities, are tracked as part of normal business operations. |
| C8.3. Documentation shall be provided by the forest manager to enable monitoring and certifying organizations to trace each forest product from its origin, a process known as the "chain of custody." | NE | - |
| C8.4. The results of monitoring shall be incorporated into the implementation and revision of the management plan. | NE | - |
| C8.5. While respecting the confidentiality of information, forest managers shall make publicly available a summary of the results of | NE | - |

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| <p>monitoring indicators, including those listed in Criterion 8.2.</p> | | |
| <p>P9 Management activities in high conservation value forests shall maintain or enhance the attributes which define such forests. Decisions regarding high conservation value forests shall always be considered in the context of a precautionary approach.</p> <p>High Conservation Value Forests are those that possess one or more of the following attributes: 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 Forest areas that are in or contain rare, threatened or endangered ecosystems Forest areas that provide basic services of nature in critical situations (e.g., watershed protection, erosion control) Forest areas fundamental to meeting basic needs of local communities (e.g., subsistence, health) and/or critical to local communities’ traditional cultural identity (areas of cultural, ecological, economic or religious significance identified in cooperation with such local communities).</p> | | |
| <p>C9.1. Assessment to determine the presence of the attributes consistent with High Conservation Value Forests will be completed, appropriate to scale and intensity of forest management.</p> | <p>NE</p> | <p>-</p> |
| <p>C9.2. The consultative portion of the certification process must place emphasis on the identified conservation attributes, and options for the maintenance thereof.</p> | <p>NE</p> | <p>-</p> |
| <p>C9.3. The management plan shall include and implement specific measures that ensure the maintenance and/or enhancement of the applicable conservation attributes consistent with the precautionary approach. These measures shall be specifically included in the publicly available management plan summary.</p> | <p>NE</p> | <p>-</p> |

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| <p>C9.4. Annual monitoring shall be conducted to assess the effectiveness of the measures employed to maintain or enhance the applicable conservation attributes.</p> | <p>C</p> | <p>-</p> |
| <p>9.4.a. The forest owner or manager monitors, or participates in a program to annually monitor, the status of the specific HCV attributes, including the effectiveness of the measures employed for their maintenance or enhancement. The monitoring program is designed and implemented consistent with the requirements of Principle 8.</p> | <p>C</p> | <p>TCF conducts extensive monitoring to assure that HCVs are maintained and that the management program for HCVFs is effective. For example, TCF has some specific monitoring programs associated with HCVF features, such as EMAP aquatic monitoring on Class 1 streams. The results of HCVF monitoring is recorded in as part of the annual program meeting review.</p> |
| <p>9.4.b. When monitoring results indicate increasing risk to a specific HCV attribute, the forest owner/manager re-evaluates the measures taken to maintain or enhance that attribute, and adjusts the management measures in an effort to reverse the trend.</p> | <p>NA</p> | <p>No observed threats have occurred in relation to TCF’s HCVF areas so far, so this indicator is not applicable.</p> |
| <p>P10 Plantations shall be planned and managed in accordance with Principles and Criteria 1-9, and Principle 10 and its Criteria. While plantations can provide an array of social and economic benefits, and can contribute to satisfying the world's needs for forest products, they should complement the management of, reduce pressures on, and promote the restoration and conservation of natural forests.</p> <p>Principle 10 is not applicable since TCF is not practicing plantation forest management, as defined by FSC.</p> | | |

Appendix 6 – Chain of Custody Indicators for FMEs Conformance Table

Chain of Custody indicators were not evaluated during this evaluation.

Appendix 7 – Trademark Standard Conformance Table

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

PART I: General Requirements for Use of the FSC Trademarks

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

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| <p>Description of how the FME currently uses, or intends to use, FSC trademarks and/or labels, including but not limited to printed materials, Internet applications, on-product labeling, and other public-facing media:</p> | <p>The FME uses the FSC trademark in publicly-facing materials, including on its website, annual reports, and IRMPs.</p> |
| <p>1.2 Trademark License Agreement and valid certificate In order to use these FSC trademarks, the FME shall have a valid FSC trademark license agreement and hold a valid certificate. <i>Note: Consultations for certification Organizations applying for forest management certification or conducting activities related to the implementation of controlled wood requirements, may refer to FSC by name and initials for stakeholder consultation.</i></p> | <p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs</p> |
| <p>1.6 Product Group List The products intended to be labeled or promoted as FSC certified have been included in the FME’s certified product group list.</p> | <p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs</p> |
| <p>Section 1.2 and 1.6 Evidence: Reviewed website, 2017 annual report, and a sample of IRMPs. Reviewed product group list.</p> | |
| <p>1.3 Trademark License Code The FSC trademark license code assigned by FSC to the FME accompanies any use of the FSC trademarks. It is sufficient to show the code once per product or promotional material.</p> | <p><input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> C w/Obs</p> |
| <p>1.4 Trademark Symbol The FSC logo and the ‘Forests For All Forever’ marks shall include the trademark symbol ® in the upper right corner when used on products or materials to be distributed in a country where the relevant trademark is registered. For use in a country where the trademark is not yet registered, use of the symbol ™ is recommended. The Trademark Registration List document is available in the FSC trade-mark portal and marketing toolkit. The symbol ® shall also be added to ‘FSC’ and ‘Forest Steward-ship Council’ at the first or most prominent use in any text; one use per material is sufficient (e.g. website or brochure). <i>NOTE: The use of the trademark symbol is not required for FSC claims in sales and delivery documents, or for the disclaimer statement specified in requirement 6.2.</i></p> | <p><input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> See Finding 2018.1 (closed) <input type="checkbox"/> C w/Obs <input type="checkbox"/> N/A, one or more noted exceptions apply</p> |

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| <p>2.1 Restrictions on using FSC trademarks The FME has not used the FSC trademarks in the following ways:</p> <ul style="list-style-type: none"> a) in a way that could cause confusion, misinterpretation, or loss of credibility to the FSC certification scheme; b) in a way that implies that FSC endorses, participates in, or is responsible for activities performed by the FME, outside the scope of certification; c) to promote product quality aspects not covered by FSC certification; d) in product brand or company names, such as ‘FSC Golden Timber’ or website domain names; e) in connection with FSC controlled wood or controlled material – they shall not be used for labelling products or in any promotion of sales or sourcing of controlled material or FSC controlled wood; the initials FSC shall only be used to pass on FSC controlled wood claims in sales and de-livery documentation, in conformity with FSC chain of custody requirements. | <table border="1"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> </table> | <input checked="" type="checkbox"/> | C | <input type="checkbox"/> | NC | <input type="checkbox"/> | C w/Obs | | |
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| <input type="checkbox"/> | NC | | | | | | | | |
| <input type="checkbox"/> | C w/Obs | | | | | | | | |
| <p>2.2 Translations The name ‘Forest Stewardship Council’ has not been replaced with a translation. A translation may be included in brackets after the name, for example: Forest Stewardship Council® (translation)</p> | <table border="1"> <tr><td><input type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> <tr><td><input checked="" type="checkbox"/></td><td>N/A, no translations</td></tr> </table> | <input type="checkbox"/> | C | <input type="checkbox"/> | NC | <input type="checkbox"/> | C w/Obs | <input checked="" type="checkbox"/> | N/A, no translations |
| <input type="checkbox"/> | C | | | | | | | | |
| <input type="checkbox"/> | NC | | | | | | | | |
| <input type="checkbox"/> | C w/Obs | | | | | | | | |
| <input checked="" type="checkbox"/> | N/A, no translations | | | | | | | | |
| <p>Sections 1.3, 1.4, 2.1, and 2.2 Evidence: Reviewed website, 2017 annual report, and a sample of IRMPs. See Finding 2018.1 (closed).</p> | | | | | | | | | |
| <p>Sections 8 and 9 Graphic Rules The FME has only used FSC logos that conform to the standard requirements governing:</p> <ul style="list-style-type: none"> • color and font (8.1-8.3); • format and size (8.4-8.9); • label placement (8.10); and • ‘Forests For All Forever’ marks (9.1-9.7). | <table border="1"> <tr><td><input type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> <tr><td><input checked="" type="checkbox"/></td><td>N/A, not using FSC logo</td></tr> </table> | <input type="checkbox"/> | C | <input type="checkbox"/> | NC | <input type="checkbox"/> | C w/Obs | <input checked="" type="checkbox"/> | N/A, not using FSC logo |
| <input type="checkbox"/> | C | | | | | | | | |
| <input type="checkbox"/> | NC | | | | | | | | |
| <input type="checkbox"/> | C w/Obs | | | | | | | | |
| <input checked="" type="checkbox"/> | N/A, not using FSC logo | | | | | | | | |
| <p>1.5 Trademark Use Approval The FME has submitted all intended uses of the FSC trademarks to SCS for approval. OR The FME has an approved trademark use management system in place. (If the FME has a trademark use management system, complete Annex A.)</p> <p>4.6 FSC trademarks may be used to identify FSC-certified materials in the chain of custody before the products are finished. It is not necessary to submit such segregation marks for approval. All segregation marks shall be removed before the products go to the final point of sale or are delivered to uncertified organizations.</p> | <table border="1"> <tr><td><input checked="" type="checkbox"/></td><td>C</td></tr> <tr><td><input type="checkbox"/></td><td>NC</td></tr> <tr><td><input type="checkbox"/></td><td>C w/Obs</td></tr> </table> | <input checked="" type="checkbox"/> | C | <input type="checkbox"/> | NC | <input type="checkbox"/> | C w/Obs | | |
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| <p>Sections 1.5 Evidence: Reviewed approvals.</p> | | | | | | | | | |

PART II: On-Product Use of FSC Trademarks

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

PART III: Promotional Use of FSC Trademarks

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

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

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

Annex A: Trademark use management system

N/A, not using a trademark management system

Annex B. Additional trademark rules for group FM certificate holders

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

Appendix 8 – Group Management Program

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