

The Conservation Fund

410 Market St. Suite 360
Chapel Hill, NC 27514

14951 "A" Caspar Rd, Box 50
Caspar, California 95420

6R031

SFI[®] 2015-2019 Forest Management Standard

Surveillance

NSF International Forestry Program Audit Report

A. The Conservation Fund **NSF Customer Number (FRS): 6R031**

B. Scope

Management of lands in The Conservation Fund's Working Forest Fund and related properties. This certificate covers SFI 2015-2019 Forest Management Standard Objectives 1 through 12, 14, and 15 and the 2010-2014 SFI Standard (Section 2). The SFI 2015-2019 Forest Management Standard meets and exceeds the requirements of the earlier SFI 2010-2014 SFI Standard (Section 2), therefore fiber sold under this certificate counts as 100% SFI and 100% PEFC certified forest content. The SFI Certificate Number is NSF-SFIS-6R031.

Note: Refer to audit plan for the list of sites included.

C. NSF Audit Team

Mike Ferrucci, NSF Lead Auditor; Walter Mark, SCS Lead Auditor

D. Audit Dates

September 29-30; October 3-6 and 31; November 1 and 4

E. Reference Documentation

SFI 2015-2019 Forest Management Standard

Company Documentation:

Forest Management Plans for audited properties;
Working Forest Fund Guidelines Digest Updated September 2015;
TCF-SFI-03-Evidence Manual Forest Management;
SFI Forest Management Program-The Conservation Fund (TCF) and Subsidiaries;
The Conservation Fund Employee Manual - Revised August 2016.

F. Audit Results: Based on the results of this assessment, the auditor concluded:

- Acceptable with no nonconformities
 The following nonconformities were identified and will require corrective action.

Major: 0 Minor: 0

In addition, 3 opportunities for improvement (OFIs) were identified)

Corrective actions and supporting documentation should be submitted to NSF through the NSF Online Customer Portal. For assistance, please contact your NSF Certification Project Manager.

G. Changes to Operations or to the Standard

Note: *Were there any significant changes in operations, procedures, specifications, facility records, etc., from the previous visit?*

- Yes: The program's SFI Procedures were streamlined by the new Certification Coordinator David Whitehouse.
 No

H. Other Issues Reviewed

- | | | | | | | |
|-------------------------------------|-----|--------------------------|----|-------------------------------------|-----|---|
| <input checked="" type="checkbox"/> | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | Public report from previous audit is posted on the SFI website |
| <input type="checkbox"/> | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> | N/A | Relevant industry specific logos or labels (SFI, PEFC, etc.) are utilized correctly. |
| <input type="checkbox"/> | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | Relevant accreditation logos (ANSI or ANAB) are utilized correctly and meet rules specified in AESOP 4876 sections 12-15 and AESOP 14680 section GP-59. |
| <input type="checkbox"/> | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> | N/A | Nonconformities from previous audit were reviewed. |

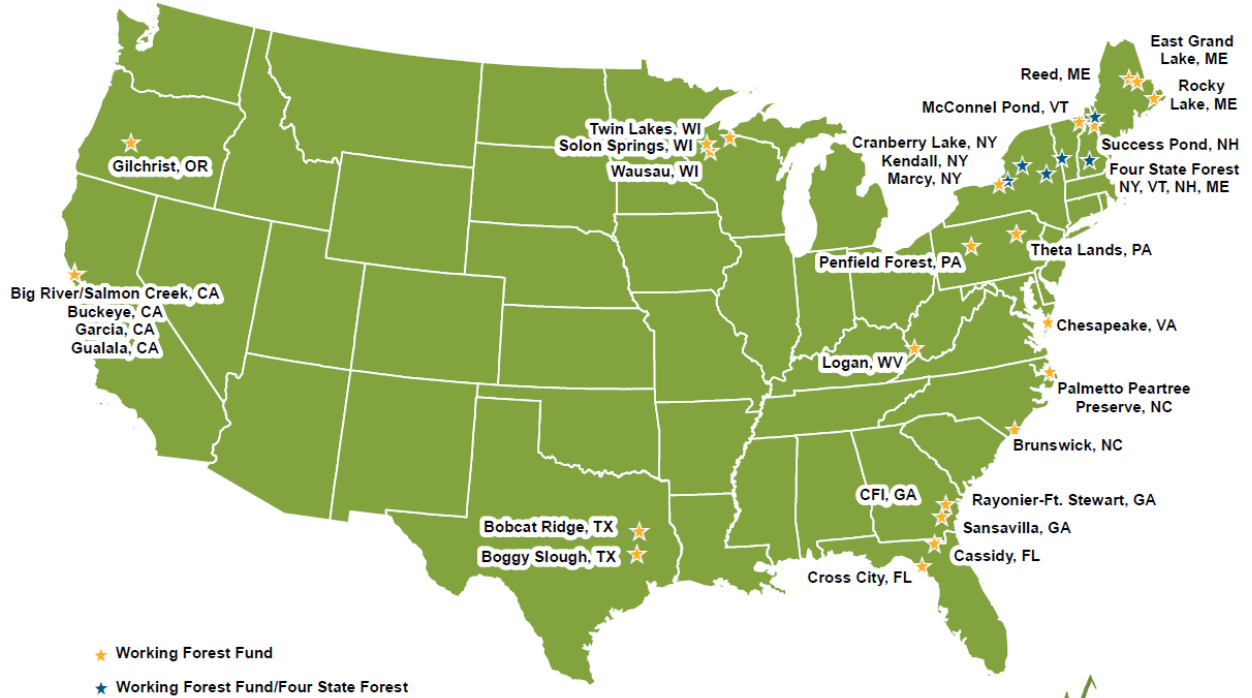
I. Future Audit Schedule

Following the initial registration audit, continued certification requires annual assessments commonly referred to as "Surveillance Audits". Additionally, at the end of the certification period, maintaining certification requires the completion of a recertification or "Reassessment Audit". The next audit is a surveillance audit scheduled to be conducted during September and October, 2017.

J. Appendices

- [Appendix 1:](#) Audit Notification Letter and Audit Agenda
- [Appendix 2:](#) SFI Public Summary Report
- [Appendix 3:](#) SFI Forest Management Standard Checklist
- [Appendix 4:](#) Meeting Attendance
- [Appendix 5:](#) Field Site Notes

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Appendix 1 Audit Notification Letter and Audit Agenda

David Whitehouse, Forest Operations Manager, Working Forest Fund®

The Conservation Fund

410 Market St. Suite 360

Chapel Hill, NC 27516

RE: 2016 SFI Surveillance Audit

Dear David,

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

Audit Scope

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

The current scope includes these properties:

Dual Certified Properties	State
Garcia	CA
Big River/Salmon Creek	CA
Gualala	CA
Buckeye	CA
McConnell Pond	VT
Success Pond	NH
Penfield	PA
East Grand Lake	ME
Bobcat Ridge	TX
Chesapeake	VA

Non-Working Forest Fund Properties	State
Bald Cap	NH
Biddle/Bray	VT
AT Bridgewater Barnard	VT
Maritime Marine WMA	MD
Galestown Creek	MD
Spruce Peak	VT
Stanley Works	CT
Canaan Valley Refuge	WV
Okefenokee NWR	GA
Redtown	TX
Pinhoti Trail	GA
Lower Devil's Swamp Little Biloxi Wolf	MS
Reeves Jackson	NC
Big Thicket	TX

East Fork French Broad	NC
Chattahoochee James Sisson	GA
Pisgah Backbone Ridge	NC
Petersburg	VA
Wapiti Farms, LLC	MD
Little River Canyon Preserve	AL
King's Mountain	NC
Emmitsburg Giftlands	MD
Waccamaw NWR	SC
Francis Marion	SC
Mendocino National Forest	CA
Cleveland National Forest	CA
Reed	ME
Logan	WV
Yankee	NY, VT, NH,
Sansavilla	GA
Twin Lakes	WI
Cranberry Lake	NY
Kendall	NY
Brunswick	NC

During the 2016 audit the following properties will be visited:

- Properties within existing scope: North Coast, California (all 5 tracts), Stanley Works, CT;
- Associated with scope expansion:
 - Sansavilla, GA 19,577 acres Very active; restore to Longleaf, much Loblolly being cut;
 - Jamaica Tract, Part of Yankee, Jamaica, VT
 - Stanley Tract, Kent, CT

Preparing for the SFI Audit

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

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

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

To the degree possible in advance of the audit, please provide key written evidence for the SFI requirements selected for review (see list below). I would ask that you place particular emphasis on SFI-focused requirement (SFI Implementation Committee involvement, SFI reporting, etc.) as these are often overlooked when customers prepare for dual audits.

Finally, please provide your procedures and/or policies manuals, including any SFI-specific or Forest Certification-specific procedures or policies.

SFI Requirements Selected for 2016 Surveillance Audit

(Note: The first number indicates the Objective; for example 8.1 is under Objective 8.)

1.1, 1.2 California Properties – major changes only; Other Properties Audited in 2016 – all requirements. All requirements within Objectives 2 through 7 (field-oriented requirements) to the extent they are relevant to the field sites inspected.

- 8.1 Recognize and respect Indigenous Peoples' rights
- 8.2 Forest management on public lands and Indigenous Peoples
- 8.3 Communicate with and respond to local Indigenous Peoples with respect to sustainable forest management practices on their private lands
- 9.1 Forestry Law/Reg. Compliance System
- 9.2 Social Law Compliance (including ILO)
- 11.1 Training of Contractors and Personnel
- 11.2 Improved Wood Producer Professionalism
 - 11.2.3 Logger certification
- 14.1 Summary Audit Report
- 14.2 Annual Reporting to SFI, Inc.
- 15.1 Management Review System

Role of SFI Inc. Office of Label Use and Licensing

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

Rachel Dierolf, Manager of Statistics and Labeling
Sustainable Forestry Initiative, Inc.
900 17th Street NW, Suite 700
Washington, DC 20006
613-274-0124 rachel.dierolf@sfiprogram.org

Agenda for Review

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

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

Sincerely,



Mike Ferrucci, SFI Lead Auditor

203-887-9248 mferrucci@iforest.com

Audit Agenda

Type of Audit

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

Audit Objectives

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

Schedule

Day/Date	Time	Activity/Process and Location to be Audited
September 29	3-4 pm	SFI Opening Meeting – during drive from Clearwater to Brunswick, GA
September 30	7 am – 4 pm	Sansavilla, Georgia: Field Audit
	4 pm	Daily Closing Briefing
	4:30-6 pm	Travel to Jacksonville, FL Airport (JAX)
October 3	1 pm	Mike Ferrucci arrives SFO, Delta 434 from JFK
	1:40 pm	David Whitehouse arrives SFO, Flight 1395 from Denver (first leg from RDU)
	Afternoon	Travel to Fort Bragg
October 4	8 am	Opening Meeting at TCF Office
	8:15 am to 10 am	Office review of relevant requirements Objectives 1, 5, 8-15
	10 am -6:15 pm	Field review of activities on North Coast California properties; Review relevant requirements Objectives 1-7
October 5	7:45 am to 5:30 pm	Field review of activities on North Coast California properties (continued); Review relevant requirements Objectives 1-7
October 6	7:30- 8:30 am	Office review of selected documentation and discussion of outstanding issues
	8:30 am-1:30	Field review of activities on North Coast California properties (continued); Review relevant requirements Objectives 1-7
	1:30 pm	Preliminary Closing Meeting, California portion Audit
	2:30 pm	Adjourn California Audit
	Afternoon/ Evening (3 hr.)	M. Ferrucci and D. Whitehouse return to San Francisco; review issues during drive (Best Western El Rancho Inn, 1100 El Camino Real, Millbrae, CA)
October 31	-	Travel to Brattleboro, Vermont (Hampton Inn)
November 1	7am to 1 pm	Audit of Jamaica, Vermont Property
November 4	11 am to 4 pm	Audit of Stanley Property, Kent, Connecticut
November 6	9 -11 am	Closing Meeting, SFI 2016 Audit

Appendix 2 SFI Public Summary Report

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

NSF International initially certified The Conservation Fund to the SFIS on July 1, 2007 and recertified the program in 2012 and in 2015, when organization was re-certified to the new SFI 2015-2019 Forest Management Standard requirements. This report describes the 2016 Surveillance Audit designed to review a subset of the requirements with a focus on changes in the standard, changes in operations, the management review system, and efforts at continuous improvement. The, all of which were subject to detailed review. The audit included a review of lands in California, Connecticut, Georgia and Vermont, comprising 8 of the 34 named properties making up the program.

Program Background

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

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

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

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

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

The Conservation Fund acquired the 23,785-acre Garcia River Forest in February, 2004. In October 2006, The Conservation Fund acquired an additional 16,100 acres in two tracts – the 11,707-acre Big River Forest and the 4,204-acre Salmon Creek Forest. In December 2011, The Fund acquired the 13,537 acre Gualala River Forest. The Fund acquired the 177 acre Hardell property, adjacent to Salmon Creek, in September of 2012. The Hardell property will be managed as part of the Salmon Creek tract. In 2013, the Fund acquired the 18,120 acre Buckeye Forest in Sonoma County. The Conservation Fund and its partners developed an Integrated Resource Management Plan (IRMP) for each acquisition to guide the management and restoration plan for these properties. Partners include the State Coastal Conservancy, Wildlife Conservation Board, State Water Board, North Coast Regional Water Quality Control Board, David and Lucile Packard Foundation, Nature Conservancy, and National Fish and Wildlife Foundation and Sonoma County Agricultural Preservation and Open Space District. These properties represent a collective capital investment of approximately \$120 million. By acquiring these properties, the Fund and its partners hope to demonstrate that these large tracts of intensively managed coastal forest can gradually be returned to sustainable timber production and ecological vitality through the use of innovative financing and patient management by a nonprofit organization in partnership with private and public agencies and community stakeholders.

Source: North Coast Policy Digest 8/14/2015

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

The Conservation Fund’s SFI Program is managed by David Whitehouse, Forest Operations Manager. The audit was performed by NSF in September, October, and November by an audit team headed by Mike Ferrucci, Lead Auditor supported by Walter Mark. Audit team members fulfill the qualification criteria for conducting audits contained in SFI 2015-2019 Standards and Rules, Section 9 - Procedures and Auditor Qualifications and Accreditation.

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

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

Number	Requirement	Reason
2.1.3.	Plantings of exotic tree species should minimize risk to native ecosystems.	No exotic tree species are planted.

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

Audit Process

NSF initiated the audit process with a Readiness Review to confirm the scope of the audit, review the SFI Indicators and evidence to be used to assess conformance, verify that the Company was prepared to proceed to the Certification Audit, and to prepare a detailed audit plan. NSF then conducted the Certification Audit of conformance to the SFI 2015-2019 Standards and Rules®, Section 2. A report was prepared and final approval was done by an independent Certification Board member assigned by NSF. Follow-up or Surveillance Audits are required by SFI, Section 9. The initial Surveillance Audit is scheduled for September 2016.

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

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

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

Overview of Audit Findings

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

Opportunities for Improvement

There were three Opportunities for Improvement.

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

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

SFI Indicator 1.1.1 requires, in part, “1.1.1. Forest management planning at a level appropriate to the size and scale of the operation”.

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

SFI Indicator 2.3.5 requires “Criteria that address harvesting and site preparation to protect soil productivity.”

There is an Opportunity for Improvement in the clarity of the logging agreements in California regarding the use of qualified logging professionals.

SFI Indicator 11.1.5 requires that “Program Participants shall have written agreements for the use of qualified logging professionals and/or certified logging professionals (where available) and/or wood producers that have completed training programs and are recognized as qualified logging professionals.”

The “Piper Feldman Gulch BR Logging agreement” states that the “CONTRACTOR warrants that it is a Licensed Timber Operator (LTO) possessing a valid LTO license from the California State Board of Forestry.” This agreement does not specify the required training per the memo “California SFI® Implementation Committee Policy Regarding Qualified Logging Professionals”. Evidence was provided that the contractor, Robert Piper, who is a California LTO and is the only contractor for timber harvests, has taken some of the required SFI training.

Exceptional Practices

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

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

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

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

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

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

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

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

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

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

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

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

The Conservation Fund exceeds the standard through its leadership and implementation of many Forest Legacy Program or other conservation easements throughout the country, including closed deals in Maine, New Hampshire, Vermont, New York, Pennsylvania, and North Carolina.

- 12.2.1 Periodic educational opportunities promoting sustainable forestry

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

General Description of Evidence of Conformity

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

Objective 1 Forest Management Planning

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

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

Objective 2 Forest Health and Productivity

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

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

Objective 3 Protection and Maintenance of Water Resources

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

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

Objective 4 Conservation of Biological Diversity

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

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

Objective 5 Management of Visual Quality and Recreational Benefits

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

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

Objective 6 Protection of Special Sites

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

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

Objective 7 Efficient Use of Fiber Resources

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

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

Objective 8 Recognize and Respect Indigenous Peoples' Rights

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

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

Objective 9 Legal and Regulatory Compliance

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

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

Objective 10 Forestry Research, Science and Technology

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

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

Objective 11 Training and Education

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

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

Objective 12 Community Involvement and Landowner Outreach

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

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

Objective 13 Public Land Management Responsibilities

To participate and implement sustainable forest management on public lands.

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

Objective 14 Communications and Public Reporting

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

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

Objective 15. Management Review and Continual Improvement

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

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

Relevance of Forestry Certification

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

1. Sustainable Forestry

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

2. Forest Productivity and Health

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

3. Protection of Water Resources

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

4. Protection of Biological Diversity

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

5. Aesthetics and Recreation

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

6. Protection of Special Sites

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

7. Responsible Fiber Sourcing Practices in North America

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

8. Legal Compliance

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

9. Research

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

10. Training and Education

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

11. Community Involvement and Social Responsibility

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

12. Transparency

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

13. Continual Improvement

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

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

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

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

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

For Additional Information Contact:

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David Whitehouse

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Appendix 3 SFI 2015-2019, Section 2, Forest Management Standard Checklist

FRS# 6R031 – The Conservation Fund

Date of audits: September 30; October 4-6; November 1 and 4, 2016

1.2 Additional Requirements

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

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

Audit Notes:

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

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

Audit Notes: Web Site

Objective 1 Forest Management Planning

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

Performance Measure 1.1

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

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

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

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

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

Reviewed TCF Working Forest Fund webpage

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

Review North Coast California webpage:

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

Review North Coast Reference Documents webpage:

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

Public Summary Of The Conservation Fund's Working Forest Fund® Program Forest Management Plans
Sansavilla Tract Management Plan - June 23, 2016

North Coast California management plans reviewed:

- Gualala River Forest Integrated Resource Management Plan, August 2014
- Big River and Salmon Creek Integrative Resource Management Plan, August 2009

- Garcia River Forest Integrative Resource Management Plan, August 2006
- Draft Buckeye Forest Integrated Resource Management Plan, January 26, 2016

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

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

- CA-Ten Mile River Ranch - Vest Land LMP
- CT-Stanley Works LMP
- GA-Foxfire (Sisson) LMP
- NC – Kings Mtn –Plonk LMP
- SC – Waccamaw NWR – Normandy LMP

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

North Coast California: Reviewed “TCF CA_Harvest Volume History_2007-2016” which provides volumes by year and by tract, including Big River, Salmon Creek, and Garcia River tracts; the other two tracts have not had any harvest.

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

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

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

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

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

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

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

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

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

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

Sansavilla Tract, Georgia: "Sansavilla Stand Data 8-1-2016" lists, for each stand, Dominant Species

Dominant Stand	Stand #	Acres	AGE	Pine Tons Total	Hardwood Tons Total
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1.1.5. Documentation of forest practices (e.g., *planting*, fertilization and thinning) consistent with assumptions in harvest plans.

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

Audit Notes: Jamaica Tract, Vermont: Interviews and observation confirmed light touch on this tract.

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

North Coast California:

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

Performance Measure 1.2

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

1.2.1. Program Participants shall not convert one *forest cover type* to another *forest cover type*, unless the conversion:

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

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

Audit Notes: A policy consistent with this SFI Indicator is stated in the "SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries".

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

North Coast California:

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

1.2.2. Where a *Program Participant* intends to convert another *forest cover type*, an assessment considers:

- a. *Productivity* and *stand* quality conditions and impacts which may include social and economic values;

- b. Specific ecosystem issues related to the site such as invasive species, insect or disease issues, riparian protection needs and others as appropriate to site including regeneration challenges; and
- c. Ecological impacts of the conversion including a review at the site and *landscape* scale as well as consideration for any appropriate mitigation measures.

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

Audit Notes: Sansavilla Tract, Georgia: The conversion from dense Loblolly Pine plantations to the either Slash Pine or Longleaf Pine, each having a more open stand structure, is driven by the habitat needs of the gopher tortoise and is based on local and landscape-scale ecological analyses.

North Coast Forest Conservation Program: Prior to each harvest or vegetation management treatment (silviculture) foresters assess field conditions and develop a detailed prescription which covers the required issues. A long-term program is in place to control and treat tanoak, which is present in greater density than is desirable. The unnaturally-high density of tanoak was caused in part by different management practices and in part by long-term fire exclusion. There are also some efforts to adjust composition and location of Douglas-fir and Redwood. In all such cases significant amounts of field analyses support written prescriptions which then must past multi-disciplinary regulatory review in most cases. Rare types are being increased, not diminished.

Performance Measure 1.3

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

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

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

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

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

Sansavilla Tract, Georgia:

Sansavilla Tract Management Plan: “No stands in the FMU have been converted to non-forest use.”

North Coast Forest Conservation Program: No conversions per observations and interviews.

Objective 2 Forest Health and Productivity

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

Performance Measure 2.1

Program Participants shall promptly reforest after final harvest. Indicators:

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

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

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

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

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

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

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

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

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

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

Audit Notes: No exotics are planted at any time on The Conservation Fund's lands.

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

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

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

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

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

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

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

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

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

Performance Measure 2.2

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

2.2.1. Minimized chemical use required to achieve management objectives.

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

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

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

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

The Forest Operations Manager/Forestry Consultants shall evaluate prospective application areas. The Forest Operations Manager approves contracts for chemical application prescriptions based on the silvicultural needs of the site. Chemical use shall be planned so as not to exceed levels necessary to achieve specific management objectives. The Forest Operations Manager/Forestry Consultants shall only contract with licensed and certified chemical application contractors. Their applicators licenses are checked prior to awarding the contract.

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

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

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

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

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

Audit Notes: Sansavilla Tract, Georgia: Customized herbicide prescriptions deploy standard chemical formulations.

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

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

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

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

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

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

Post signs with 30-days' notice.

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

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

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

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

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

"Chemical herbicide application would be accomplished according to the herbicide label following all applicable federal, state, and local regulations. Copies of Material Safety Data Sheets (MSDS) are maintained at the regional offices. TCF uses contractors for the application of all herbicides, which are ground and aerially applied. Contractors that apply chemicals are responsible for specific components of the application process that are contained in the Site Preparation Contract or equivalent."

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

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

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

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

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

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

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

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

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

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

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

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

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

North Coast California:

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

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

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

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

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

Audit Notes: Sansavilla Tract, Georgia: Confirmed that applicator LB&S Air, Inc. has license.
Connecticut and Vermont: No chemical use recently, but reserve option for invasive control.

North Coast Forest Conservation Program:

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

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

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

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

Audit Notes: Sansavilla Tract, Georgia: Interviews confirmed careful planning and application consistent with the indicator.
North Coast California: Herbicides sites are posted; confirmed the posting sign verbiage: "Advisory: This area will be treated with herbicide on or about (DATE)."

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

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

Performance Measure 2.3

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

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

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

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

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

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

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

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

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

Audit Notes: Sansavilla Tract, Georgia: No erosion was noted on any of the numerous sites inspected.
 North Coast Forest Conservation Program: Numerous effective Waterbars per BMPs were observed in all locations where they would be needed.

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

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

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

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

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

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

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

Audit Notes: Sansavilla Tract, Georgia: Vigorous trees were retained in stands that had shelterwood establishment harvests.
 North Coast Forest Conservation Program: The single tree and group selection harvests to manage for Redwood and Douglas Fir are the most commonly used silvicultural treatments on the forests. Active and completed harvests reviewed showed that these prescriptions were appropriate for the sites and forests and were consistently applied well, and that vigorous trees were retained. A very low percentage of residual trees were

damaged during harvests, particularly considering the steep slopes, the nature of the sprout redwood clumps being thinned, and the somewhat high residual stocking in portions of the harvested stands.

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

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

Audit Notes: **Jamaica Tract, Vermont: There is an Opportunity for Improvement in the clarity of criteria to address rutting during timber harvests.**

North Coast Forest Conservation Program: California’s Forest Practice rules and the North Coast Policy Digest 8/14/2015 specify the criteria. In addition all Timber Harvest Plans written for The Conservation Fund include provisions 14CCR916.9(k) Year Round Logging Road ... and 14CCR916.9(l) Extended Wet Weather Period
 Sansavilla Tract, Georgia: Not reviewed.

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

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

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

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

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

Performance Measure 2.4

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

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

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

Audit Notes: Jamaica Tract, Vermont: Foresters demonstrated awareness of important insect and fungal pests.

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

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

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

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

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

Sansavilla Tract, Georgia: The forest is kept healthy and productive by monitoring stands, thinning regularly, and acting as needed to limit impacts and spread of pine beetles by timely sanitation/salvage harvests. One small bark

beetle pocket was observed; this is being monitored and response actions are under development. No other forest insect or disease problems were observed, consistent with a similar statement in the tract management plan.

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

Foresters are quite well-informed about forest insects and diseases.

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

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

Audit Notes: Sansavilla Tract, Georgia:

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

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

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

Performance Measure 2.5

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

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

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

Audit Notes: Jamaica Tract, Vermont: N/A, trees are not planted.

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

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

Objective 3 Protection and Maintenance of Water Resources

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

Performance Measure 3.1

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

Indicators:

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

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

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

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

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

Audit Notes: Confirmed that the standard timber sale contract includes a provision that specifies use of BMPs.
 Confirmed provision for the Jamaica Tract, Vermont: Timbersale Contract Number: TCF_Redstart_2015-01.
 Sansavilla Tract, Georgia: Contract Number: 08262016 (shelterwood cut, stop 4, Stand 831) includes requirements to follow BMPs and for training, which are found in Appendix A Contract Provisions (Clause 1 for BMPs, Clause 3 for QLP logger training).
 North Coast Forest Conservation Program: Requires adherence to THP which comprises the California equivalent of BMPs.

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

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

Audit Notes: Confirmed monitoring for the Jamaica Tract, Vermont by reviewing the timber sale inspection sheet for the harvest completed in the winter of 2016: Timbersale Contract Number: TCF_Redstart_2015-01.
 Sansavilla Tract, Georgia: Monitoring forms include BMPs
 North Coast Forest Conservation Program: RPFs employed by the company monitor all activities and keep good records of such.

Performance Measure 3.2

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

Indicators:

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

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

Audit Notes: The use of BMPs, the design of all harvest projects by trained foresters, and the review of all projects by supervisory personnel, as well as the policy of strict adherence to the regulatory programs of the respective states (where applicable) comprise such a program. Strong conformance was observed in the field at all sites.
 Sansavilla Tract, Georgia: Confirmed that printed and GIS maps show wetlands and waterbodies. Interviews and review of documents confirmed these statements from the Sansavilla Tract Management Plan:

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

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

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

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

Audit Notes: Maps accurately depict the wetland and water features, and these are also marked on the ground prior to treatment.

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

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

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

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

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

Audit Notes: Jamaica Tract, Vermont: riparian buffers were observed on the harvested tract.

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

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

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

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

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

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

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

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

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

Objective 4 Conservation of Biological Diversity

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

Performance Measure 4.1

Program Participants shall conserve biological diversity. Indicators:

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

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

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

The Conservation Fund has been a leader in efforts to permanently protect key properties identified through a sophisticated analysis. All management activities are planned with biodiversity conservation as the highest priority.

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

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

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

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

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

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

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

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

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

- Snags: Retain all snags, (all should be retained but only those greater than 18-inch DBH and 20 foot height shall count towards the retention targets).

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

The following language is used in the Option A, reconciling a past inconsistency: "Retain all tanoak 20" DBH and larger. These large hardwoods are of the highest value to wildlife because they tend to be the most prolific mast producers and they possess more desirable structural attributes than smaller trees. Exceptions to the general retentions guidelines may be adopted on sites with very high numbers of large tanoaks if retention of all 20" and greater tanoak will not result in sufficient sunlight and growing space for young conifers."

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

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

Audit Notes: Most properties have been assessed for their ability to contribute to the protection of representative sample areas (RSAs) for protection or conservation of unique and under-represented native community types. In many cases there are no opportunities to protect communities thought to be under-represented

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

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

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

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

Audit Notes: David Whitehouse has downloaded the relevant State Wildlife Action Plans to the The Conservation Fund sharepoint site.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Jamaica Tract, Vermont: wetlands and watercourses were buffered out of the timbersale (Contract Number: TCF_Redstart_2015-01).

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

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

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

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

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

Sansavilla Tract, Georgia:

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

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

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

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

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

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

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

North Coast Forest Conservation Program: Natural disturbance ecology is a key factor in the development of management strategies and individual treatment plans. For example the selection system (single-tree and group) is used in nearly all harvests, consistent with the scientific understanding of the ecology of redwood forests.

Performance Measure 4.2

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

4.2.1. Program to protect threatened and endangered species.

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

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

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

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

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

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

Plant surveys are conducted prior to development of all THPs.

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

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

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

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

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

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

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

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

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

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

Performance Measure 4.3

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

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

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

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

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

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

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

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

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

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

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

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

Performance Measure 4.4

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

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

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

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

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

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

North Coast Forest Conservation Program:

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

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

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

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

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

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

Objective 5 Management of Visual Quality and Recreational Benefits

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

Performance Measure 5.1

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

5.1.1. Program to address visual quality management.

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

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

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

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

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

Audit Notes: Field observations confirmed that visual impacts management considerations are employed.

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

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

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

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

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

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

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

Performance Measure 5.2

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

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

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

Audit Notes: Vermont tracts managed by Red Start Consulting: Clearcuts are not done on these properties.
 Sansavilla Tract, Georgia: Total Harvest Acres 2,526; Average Clearcut Harvest Acres = 84.2
 North Coast California: Clearcuts are not done on these properties.

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

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

Audit Notes: Vermont tracts managed by Red Start Consulting: Clearcuts are not done on these properties.
 Sansavilla Tract, Georgia: See above.
 North Coast Forest: Clearcuts are not done on these properties.

Performance Measure 5.3

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

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

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

Audit Notes: Confirmed in the field at all locations audited.
 Vermont tracts managed by Red Start Consulting: Clear-cuts are not done on these properties; partial harvesting systems are used, with single-tree and group selection the main prescription.
 Sansavilla Tract, Georgia: Licensed Professional Foresters or equivalent plan and oversee all harvests. Evidence of a well-considered planting program was provided. Planted trees grow rapidly on this tract.
 North Coast Forest Conservation: California RPFs plan and oversee all harvests. Extensive use of selection silviculture and the THP process ensure that SFI green-up requirements are met.

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

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

Audit Notes: Vermont tracts managed by Red Start Consulting: Clearcuts are not done on these properties.
 Sansavilla Tract, Georgia: GIS, printed maps, records, and field work during sale set up.
 North Coast Forest Conservation: Not needed due to use of selection silviculture. California RPFs plan and oversee all harvests.

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

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

Audit Notes: Vermont tracts managed by Red Start Consulting: Clearcuts are not done on these properties.
 Sansavilla Tract, Georgia: Buffers between clearcuts include riparian/ditch corridors.
 North Coast Forest Conservation: No clearcutting

Performance Measure 5.4

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

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

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

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

Tracts are leased to hunt clubs when possible, more commonly on tracts located in the southern U.S. For example on the Sansavilla Tract, Georgia there is one hunt club lease. This land will be available for public hunting after it transfers to the Georgia DNR.

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

Objective 6 Protection of Special Sites

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

Performance Measure 6.1

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

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

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

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

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

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

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

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

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

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

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

Objective 7 Efficient Use of Fiber Resources

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

Performance Measure 7.1

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

- 7.1.1. *Program* or monitoring system to ensure efficient utilization, which may include provisions to ensure:
- management of harvest residue (e.g., slash, limbs, tops) considers economic, social and environmental factors (e.g., organic and nutrient value to future forests and the potential of increased fuels build-up) and other utilization needs;
 - training or incentives to encourage loggers to enhance utilization;
 - exploration of markets for underutilized species and low-grade wood and alternative markets (e.g., bioenergy markets); or
 - periodic inspections and reports noting utilization and product separation.

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

Audit Notes: Jamaica Tract, Vermont: Consulting forester regularly inspects tracts and completes an inspection form.

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

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

Objective 8 Recognize and Respect *Indigenous Peoples’* Rights

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

Performance Measure 8.1

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

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

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

Audit Notes: From “SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries ”:
 “TCF has a Sustainable Forestry Commitment that contains a provision to recognize and respect Indigenous Peoples' rights. Prior to any planned site disturbing activities, the Forest Operations Manager/Forestry Consultants would access the Bureau of Indian Affairs (BIA) database of recognized tribal entities. The BIA database is available online at: <http://www.indianaffairs.gov/WhoWeAre/RegionalOffices/index.htm>”.
 Interviewed David Whitehouse who indicated that there are no such tribes near any of the WFF properties. There are federally-recognized Passamaquoddy Tribal lands in the vicinity of the Maine lands; efforts have been made to make contact.
 North Coast California: A list of all tribes that could potentially have an interest in THPs dictated by CalFire is used to send documents about each THP in advance to the tribes to allow them to consider any possible impact on cultural resources.
 Each THP includes a confidential section dedicated to cultural resources information (Section 6) with the following sub-sections: Part 1- Project Information; Part 2 – Archeological Records Check Information; Part 3 – Native American Consultation Info; Part 4 – Pre-Field Research; Part 5 – Training and Experience of Archeological Surveyors; Part 6- Survey Methods; Part 7: Survey Results; Part 8 – Evaluation of Significance (for Olsen Gulch “No determination of significance”); Part 9: Protection Measures; Part 10: Meeting with LTO; Part 11 – Site Recording

Performance Measure 8.2

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

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

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

Audit Notes: TCF does not have forest management responsibilities on public lands.

Performance Measure 8.3

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

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

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

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

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

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

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

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

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

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

TCF has a "Public Inquiries & Official Complaints Procedure (8.3.2,b)" and **foresters and managers are aware of it.**

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

Objective 9 Legal and Regulatory Compliance

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

Performance Measure 9.1

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

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

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

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

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

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

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

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

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

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

Audit Notes: The "SFI Forest Management Program" states a commitment to regulatory compliance with components:

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

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

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

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

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

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

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

Discussion: Mendocino County has recently added a regulation to specify landowner liability if the owner causes trees to be killed and then these trees are left standing for more than 90 days. The Conservation Fund has used the "hack-and-squirt" technique (which leaves standing dead trees) to meet its ecological restoration objectives in a cost-effective manner. Other landowners with similar forest types and hardwood control challenges have employed this technique widely and successfully. Based on the audit team's observations of many "hack-and-squirt" projects and on our understanding of the ordinance it does not appear that the continued use of this practice would inevitably result in a violation, and the practice certainly contributes significantly to sustainable

forestry. SFI does not require a perfect regulatory record, but expects efforts to remain in conformance. The audit team is not able to make a legal determination. Future audit teams would inquire into any violation issued, allowing the legal process to operate fully before making a determination regarding any findings associated with the possible violations of the county regulation.

Performance Measure 9.2

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

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

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

Audit Notes: The Conservation Fund Employee Manual Revised August 2016.
 North Coast Policy Digest 8/14/2015: “Commitment to Safety and Health Operating Policy, The Conservation Fund’s North Coast Forest Conservation Program”
 Signed copy of Sustainable Forestry Commitment (TCF-SFI-05)
 North Coast Policy Digest 8/14/2015 (aka “Forest Management Policies for The Conservation Fund’s North Coast Forest Conservation Program”) states the commitment to SFI on page 3.
 March 2015 workshop on diversity and equity in the work force was attended by many involved TCF staff.
 Another workshop in equity, diversity, and inclusion.

9.2.2. *Forestry enterprises* will respect the rights of workers and labor representatives in a manner that encompasses the intent of the International Labor Organization (ILO) core conventions.

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

Audit Notes: Interviewed workers to verify respect for their rights; no concerns were raised, and workers interviewed stated high job satisfaction.

Objective 10 Forestry Research, Science and Technology

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

Performance Measure 10.1

Program Participants shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners provide in-kind support or funding for forest research to improve *forest health*, *productivity* and sustainable management of forest resources, and the environmental benefits and performance of forest products. Indicators:

10.1.1. Financial or in-kind support of research to address questions of relevance in the region of operations. Examples could include, but are not limited to, areas of forest *productivity*, water quality, biodiversity, community issues, or similar areas which build broader understanding of the benefits and impacts of forest management.

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

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

The Conversation Fund allows a number of research organizations to conduct research on its properties and thereby provides in-kind support for research. Examples of research:

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

10.1.2. Research on genetically engineered trees via *forest tree biotechnology* shall adhere to all applicable federal, state, and provincial regulations and international protocols ratified by the United States and/or Canada depending on jurisdiction of management.

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

Audit Notes: TCF is not engaged in research on genetically engineered trees. This Indicator is not applicable.

Performance Measure 10.2

Program Participants shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners develop or use state, provincial or regional analyses in support of their *sustainable forestry programs*. Indicator:

10.2.1. Participation, individually and/or through cooperative efforts involving *SFI Implementation Committees* and/or associations at the national, state, provincial or regional level, in the development or use of some of the following:

- a. regeneration assessments;
- b. growth and drain assessments;
- c. *best management practices* implementation and conformance;
- d. *biodiversity conservation* information for family forest owners; and
- e. social, cultural or economic benefit assessments.

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

Audit Notes: Not reviewed during the 2016 SFI Audit.

Performance Measure 10.3

Program Participants shall individually and/or through cooperative efforts involving *SFI Implementation Committees*, associations or other partners broaden the awareness of *climate change* impacts on forests, *wildlife* and *biological diversity*. Indicators:

10.3.1. Where available, monitor information generated from regional climate models on *long-term forest health*, *productivity* and *economic viability*.

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

Audit Notes: Not reviewed during the 2016 SFI Audit.

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

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

Audit Notes: Not reviewed during the 2016 SFI Audit.

Objective 11 Training and Education

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

Performance Measure 11.1

Program Participants shall require appropriate training of personnel and contractors so that they are competent to fulfill their responsibilities under the *SFI 2015-2019 Forest Management Standard*. Indicators:

11.1.1. Written statement of commitment to the *SFI 2015-2019 Forest Management Standard* communicated throughout the organization, particularly to facility and woodland managers, and field foresters.

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

Audit Notes: Signed copy of Sustainable Forestry Commitment (TCF-SFI-05)

North Coast Policy Digest 8/14/2015 (aka "Forest Management Policies for The Conservation Fund's North Coast Forest Conservation Program") states the commitment to SFI on page 3.

Confirmed TCF Working Forest Fund webpage link covering certification
<http://www.conservationfund.org/what-we-do/working-forest-fund/certification>

The page includes:

- 1) *SFI & FSC certificates*
- 2) *Contact info*
- 3) *Summary of monitoring program*
- 4) *WFF management plan summary*

Evidence was provided to support the following, from "SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries":

TCF has a written statement of commitment to the SFI Standard as part of its Sustainable Forestry Commitment addressing all required elements of the SFI Standard.

The Sustainable Forestry Commitment (TCF-SFI-05) was formally communicated to TCF personnel:

From: Tison, Scott **Sent:** Thursday, September 08, 2016 11:05 AM **To:** AllStaff
 <AllStaff@conservationfund.org> **Subject:** FW: files for all staff Colleagues, Attached please find information related to our commitment to follow Sustainable Forest Initiative (SFI) best management practices in relation to our forested properties. Every year we are required to review our practices and train staff on the practices. David Whitehouse's presentation today during the Conservation Acquisition call is part of our annual training but staff should also take the time to review our commitment and the program attached. If you have any questions about our SFI Program please contact me or David Whitehouse. Scott M. Tison, Real Estate Legal Manager

It is also sent to all contractors including Forestry Consultants and contract loggers (TCF-SFI-07) where a direct contractual relationship exists.

11.1.2. Assignment and understanding of roles and responsibilities for achieving *SFI 2015-2019 Forest Management Standard objectives*.

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

Audit Notes: David Whitehouse, Operations Forester has overall responsibility for forest certification programs.

The SFI Forest Management Program designates responsibilities (1.1,1,a)

Interviews with employees and contractors indicated understanding of roles and responsibilities.

North Coast Forest Conservation Program:

Staff Training and Education Matrix defines training requirements for the North Coast Forest Conservation Program.

11.1.3. Staff education and training sufficient to their roles and responsibilities.

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

Audit Notes: David Whitehouse has a BS degree in wildlife management and a MS degree in forestry from Stephen F Austin State University. Experience includes an impressive range of wildlife management and forest management duties, most recently as the manager of a certified group of small owners for IP under the FSC standard.

Brian Dangler, Director of Working Forest Fund has a focus on real estate is a licensed forester in Maine and in North Carolina.

Trevor Cutsinger has a Master of Environmental Management degree from the Nicholas School of the Environment at Duke University and has attended the SFI Annual Conference in the past.

Buck Vaughn, Analyst has a B.S. in Forest Management and a Master of Forestry from North Carolina State University and is involved in continuing forestry education in North Carolina.

Working Forest Fund Staff Training and Public Service 2016 provided records of recent training in these two categories for:

- Trevor Cutsinger
- Buck Vaughn
- Brian Dangler
- Kevin Harnish
- Bethany Olmstead

North Coast Forest Conservation Program: North Coast Forest Conservation Program Staff Training Log (9.20.16) documents training of employees in each position (Timberlands Manager, Registered Professional Foresters, Forestry Technician, Program Coordinator, and Forest Analyst) for these broad categories:

- Participate in SFI Implementation Committee and other forestry associations
- Sustainable forestry principles and SFI & FSC standards
- Best management practices: specific to streamside and road management
- Principles related to reforestation, invasive plants and animals, forest resource conservation and aesthetics
- Responsibilities under the US Endangered Species Act, Salmonid Protocol, NSO Protocol and Red Legged Frog Protocol
- Safety precautions
- OSHA regulations
- Business Management
- Emerging Technologies
- Forest carbon quantification and verification
- Road engineering

11.1.4. Contractor education and training sufficient to their roles and responsibilities.

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

Audit Notes: "All contract loggers are required to be Qualified Logging Professionals as defined in the SFI Standard." Source: SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries TCF-SFI-04.

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

TCF authorizes, by entering into a contract, the forest consultant to provide the following general services:

1. Create, implement, and modify as necessary, annual and ten-year management plans and budgets,
2. Sell timber by sealed bid offering or by negotiation,

3. Implement and contract for physical improvements (including road maintenance),
4. React quickly to fire, theft, insect, disease, severe weather, or other similar problems,
5. Manage recreational or other leases, and
6. Identify and implement necessary silvicultural prescriptions.

TCF's consulting foresters closely monitor all harvest operations and provide detailed harvest plans with flagged or painted job layout and have a mandatory, structured Pre-Harvest Conference. A Pre-Harvest conference checklist is used to document this process.

Sansavilla Tract, Georgia: Interviewed Joe James, Consulting Forester for The Conservation Fund for the Sansavilla Tract. He confirmed that he checks credentials. Also interviewed Ricky Wilson, Wilson Brothers Inc. who has the Georgia Master Harvester Program training. Also confirmed that the harvest of Stand #734 has Master Timber Harvester Bryan Peacock.

North Coast California: Road contractors for the North Coast Forest Conservation Program are licensed as General Engineers. Robert Piper is the only contractor for timber harvests and is a California Licensed Timber Operator (LTO). The California SFI Implementation Committee no longer approves LTO as equivalent to QLP, and now requires some SFI-approved training. Robert Piper attended certified logger training March 17/18, 2016 in Ukiah at the Redwood Region Logging Conference. <http://www.rrlc.net/prologger-classes>. He attended 8 classes in March and will be taking additional classes in Reno in January 2017.

"Marijuana in our Forests - Safety First!" 2 Credits

"Water Drafting Regulation" 2 Credits

"Family Estate Planning 101" 2 Credits

"CHP Regulation Updates" 2 Credits

"Driver Safety for ALL" 2 Credits

"Risk Management" 2 Credits

"First Aid & CPR" 2 Credits

Jamaica Tract, Vermont: Red Start Forestry has 3 foresters who are involved, and all have professional forestry degrees. Ben Machin has a Masters degree from University of Vermont; Markus Bradley has a 2-year forestry degree from Paul Smith's College and a Bachelor of Forestry degree from University of Vermont; Dana Hazen has Bachelor of Forestry degree from Paul Smith's College. All have forestry licenses from Vermont, and 2 also have New Hampshire Licenses.

11.1.5. *Program Participants shall have written agreements for the use of qualified logging professionals and/or certified logging professionals (where available) and/or wood producers that have completed training programs and are recognized as qualified logging professionals.*

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

Audit Notes: **There is an Opportunity for Improvement in the clarity of the logging agreements in California regarding the use of qualified logging professionals.**

North Coast California: The following contracts were provided: Logging, COC Policy, Herbicide, Precommercial thinning, Planting. Piper Feldman Gulch BR Logging agreement:

The "Piper Feldman Gulch BR Logging agreement" states that the "CONTRACTOR warrants that it is a Licensed Timber Operator (LTO) possessing a valid LTO license from the California State Board of Forestry." This agreement does not specify the required training per the memo "California SFI® Implementation Committee Policy Regarding Qualified Logging Professionals". Evidence was provided that the contractor, Robert Piper, who is a California LTO and is the only contractor for timber harvests, has taken some of the required SFI training.

Confirmed provision for the Jamaica Tract, Vermont: Timbersale Contract Number: TCF_Redstart_2015-01.

Sansavilla Tract, Georgia: Contract Number: 08262016 (shelterwood cut, stop 4, Stand 831) includes requirement for training in Appendix A Contract Provisions (Clause 1 for BMPs, Clause 3 for QLP logger training).

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

TCF requires contract loggers to attend SFI sponsored Professional Logger Training or equivalent training, and to maintain their continuing education. SFI Logger Training or equivalent logger training is documented on the Monitoring Checklist and on the Logging Contract. The Forest Operations Manager also checks the name of the contract logging supervisor against the SFI Logger Training websites in the respective States.

Performance Measure 11.2

Program Participants shall work individually and/or with *SFI Implementation Committees*, logging or forestry associations, or appropriate agencies or others in the *forestry* community to foster improvement in the professionalism of *wood producers*.

Indicators:

11.2.1. Participation in or support of *SFI Implementation Committees* to establish criteria and identify delivery mechanisms for *wood producer* training courses and periodic continuing education that address:

- a. awareness of sustainable forestry principles and the SFI program;
- b. best management practices, including streamside management and road construction, maintenance and retirement;
- c. reforestation, invasive exotic plants and animals, forest resource conservation, aesthetics and special sites;
- d. awareness of responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act, and other measures to protect wildlife habitat (e.g., Forests with Exceptional Conservation Value);
- e. awareness of rare forested natural communities as identified by provincial or state agencies, or by credible organizations such as NatureServe, The Nature Conservancy, etc.
- f. logging safety;
- g. U.S. Occupational Safety and Health Administration (OSHA) and Canadian Centre for Occupational Health and Safety (CCOHS) regulations, wage and hour rules, and other provincial, state and local employment laws;
- h. transportation issues;
- i. business management;
- j. public policy and outreach; and
- k. awareness of emerging technologies.

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

Audit Notes: The Conservation Fund currently participates in SFI Implementation Committees in Georgia, California and New Hampshire, with either TCF staff or consultants attending meetings with varying degrees of regularity. Evan Smith and Scott Kelly are voting members of the CA-SFI Implementation Committee.

Because of increasing levels of activity in Georgia TCF is now on the Georgia SIC, but thus far has not yet attended. Reviewed agenda for California SFI Implementation Committee meeting attended by Scott Kelly on October 29, 2015 at the SPI Office, Anderson, CA. Topics: Review of Significant New Elements in the 2015-2019 SFI Standard; California SIC Policy on Certified Loggers- SIC Past Policy, Results of SFI Review, Draft Policy for Qualified Logging Professionals Under the SFI 2015-2019 Standard; Pro Logger and Certified Logger Update; Public Outreach Efforts; Green Building Update; Report on 2015 SFI Annual Conference in Squaw Valley Others

11.2.2. The *SIC-approved wood producer training programs* shall have a continuing education component with coursework that supports the current training *programs*, safety and the *principles of sustainable forestry*.

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

Audit Notes: Jamaica Tract, Vermont: Vermont's program has a continuing education requirement.
 Sansavilla Tract, Georgia: Georgia's Logger Training Program is the Master Harvester Program, which has a continuing education component.
 North Coast California: Requirements for Licensed Timber Operator include continuing education.

11.2.3. Participation in or support of *SFI Implementation Committees* to establish criteria for recognition of logger certification programs, where they exist, that include:

- a. completion of *SFI Implementation Committee* recognized logger training programs and meeting continuing education requirements of the training program;
- b. independent in-the-forest verification of conformance with the logger certification program standards;
- c. compliance with all applicable laws and regulations including responsibilities under the U.S. Endangered Species Act, the Canadian Species at Risk Act and other measures to protect *wildlife habitat*;
- d. use of *best management practices* to protect water quality;
- e. logging safety;
- f. compliance with acceptable *silviculture* and utilization standards;
- g. aesthetic management techniques employed where applicable; and
- h. adherence to a management or harvest plan that is site specific and agreed to by the forest landowner.

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

Audit Notes: The Conservation Fund does not participate in an SFI Implementation Committees in states where there is a logger certification program.

Objective 12 Community Involvement and Landowner Outreach

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

Performance Measure 12.1

Program Participants shall support and promote efforts by consulting foresters, state, provincial and federal agencies, state or local groups, professional societies, *conservation* organizations, *Indigenous Peoples* and governments, community groups, sporting organizations, labor, universities, extension agencies, the *American Tree Farm System*® and/or other landowner cooperative *programs* to apply *principles* of sustainable forest management. Indicators:

12.1.1. Support, including financial, for efforts of *SFI Implementation Committees*.

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

Audit Notes: Not reviewed during the 2016 SFI Audit.

12.1.2. Support, individually or collaboratively, education and outreach to forest landowners describing the importance and providing implementation guidance on:

- a. best management practices;
- b. reforestation and afforestation;
- c. visual quality management;
- d. conservation objectives, such as critical wildlife habitat elements, biodiversity, threatened and endangered species, and Forests with Exceptional Conservation Value;
- e. management of harvest residue (e.g., slash, limbs, tops) considers economic, social, environmental factors (e.g., organic and nutrient value to future forests) and other utilization needs;
- f. control of invasive exotic plants and animals;
- g. characteristics of *special sites*; and
- h. reduction of wildfire risk.

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

Audit Notes: Not reviewed during the 2016 SFI Audit.

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

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

Audit Notes: **The Conservation Fund has an exceptional program for the conservation of managed forests.**

The Conservation Fund has completed numerous conservation projects throughout the U.S. which have resulted in the permanent protection of hundreds of thousands of acres using conservation easements or, in some cases through carefully-arranged fee sales to public land agencies.

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

"TCF intends to purchase new properties of high conservation value and find an appropriate long-term owner that will manage the properties to meet conservation objectives, or manage the Working Forest Fund properties for conservation and income until a conservation easement can be placed."

Jamaica Tract, Vermont and many others in Vermont are enrolled in the Vermont Use Value Tax Program.

North Coast California: Source - Draft Buckeye Forest Integrated Resource Management Plan: 'The Buckeye Forest was acquired in May 2013 by The Conservation Fund (the Fund), in partnership with the California Coastal Conservancy, Sonoma County Agricultural Preservation and Open Space District (SCAPOS), the Gordon and Betty Moore Foundation, Packard Foundation, and the Sonoma Land Trust. The forest is owned by Sustainable Conservation, Inc. (SCI), known as Buckeye Forest (the Forest) in California ... As part of the sustainable management of the working forest, and as a condition of partner funding, SCI conveyed a conservation easement

(CE) over the majority of the Forest to SCAPOSD to maintain the conservation values inherent in the Forest in perpetuity. The conservation easement describes the Forest as having “significant conservation values” to SCI, Sonoma County and its residents, and the State of California that are worthy of conservation. The conservation values include “significant natural, ecological, fish and wildlife habitat resources; forestry resources; and open space and scenic resources.”

Performance Measure 12.2

Program Participants shall support and promote, at the state, provincial or other appropriate levels, mechanisms for public outreach, education and involvement related to sustainable forest management. Indicator:

- 12.2.1. Periodic educational opportunities promoting *sustainable forestry*, such as
- a. field tours, seminars, websites, webinars or workshops;
 - b. educational trips;
 - c. self-guided forest management trails;
 - d. publication of articles, educational pamphlets or newsletters; or
 - e. support for state, provincial, and local *forestry* organizations and soil and water *conservation* districts.

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

Audit Notes: **TCF provides an exceptional level of public education and involvement related to sustainable forest management.**

Jamaica Tract, Vermont: Consulting foresters interviewed described regular, substantive efforts in youth education, including vocational day event with 8th grade students and a twice-annual forestry training day at The Mountain School associated with Milton Academy, which provides “A semester school for high school juniors in Vermont” <http://www.mountainschool.org/>.

North Coast California: A list of outreach activities was provided by TCF prior to the start of the audit; some items were confirmed via written evidence or by interviews. The outreach program includes regular events that provide very detailed and extended opportunities for public participation and education.

Sansavilla Tract, Georgia: The property was part of a day-long field forestry tour for The Forest Guild on May 20, 2016. There were 3 attendees from TCF and more than 12 from The Forest Guild.

Performance Measure 12.3

Program Participants shall establish, at the state, provincial, or other appropriate levels, procedures to address concerns raised by loggers, consulting foresters, employees, unions, the public or other *Program Participants* regarding practices that appear inconsistent with the *SFI Standard principles* and *objectives*. Indicators:

- 12.3.1. Support for *SFI Implementation Committees* (e.g., toll-free numbers and other efforts) to address concerns about apparent nonconforming practices.

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

Audit Notes: Not reviewed during the 2016 SFI Audit.

- 12.3.2. Process to receive and respond to public inquiries. *SFI Implementation Committees* shall submit data annually to *SFI Inc.* regarding concerns received and responses.

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

Audit Notes: North Coast California: Reviewed the “TCF Complaint Log” and supporting information, confirming that there is a process for receiving, recording, and responding to public inquiries.

From TCF’s Forest Management Policies “XVV. Community Engagement: TCF seeks involvement from the local community at several stages of its activities. A public meeting was held to review the management plan for BR/SC, much like a meeting was held in Point Arena to review the GRF IRMP prior to adoption. Interested parties are invited to participate in a tour of each THP either before or shortly after submission, and again following

completion of the operation. In addition, TCF staff is available to respond to questions or concerns raised by the local community. TCF prepares and broadly disseminates an Annual Report that describes major activities on the properties, changes to policies, and monitoring results. Should a dispute arise between TCF and a local citizen, neighbor, partner organization, current or potential contractor, or other interested entity, TCF will first seek to resolve the dispute through open communication, prior to more formal dispute resolution through mediation or litigation. Records of disputes will be made available to the lead certification auditor. In all situations, TCF strives to be a good neighbor and fair employer, and will hold itself to high professional standards in its dealings with the local community, contractors, Native American tribes, public agencies, and all other interested parties.

Objective 13 **Public Land Management Responsibilities**

To participate and implement sustainable forest management on *public lands*.

Performance Measure 13.1

Program Participants with forest management responsibilities on *public lands* shall participate in the development of *public land* planning and management processes. Indicators:

13.1.1. Involvement in *public land* planning and management activities with appropriate governmental entities and the public.

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

Audit Notes: NA; The Conservation Fund does not manage public lands.

13.1.2. Appropriate contact with local stakeholders over forest management issues through state, provincial, federal or independent collaboration.

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

Audit Notes: NA; The Conservation Fund does not manage public lands.

Objective 14 Communications and Public Reporting

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

Performance Measure 14.1

A *Program Participant* shall provide a summary audit report, prepared by the *certification body*, to *SFI Inc.* after the successful completion of a certification, recertification or surveillance audit to the *SFI 2015-2019 Forest Management Standard*. Indicator:

14.1.1. The summary audit report submitted by the *Program Participant* (one copy must be in English), shall include, at a minimum,

- a. a description of the audit process, *objectives* and scope;
- b. a description of substitute *indicators*, if any, used in the audit and a rationale for each;
- c. the name of *Program Participant* that was audited, including its *SFI* representative;
- d. a general description of the *Program Participant's* forestland included in the audit;
- e. the name of the *certification body* and *lead auditor* (names of the *audit team* members, including *technical experts* may be included at the discretion of the *audit team* and *Program Participant*);
- f. the dates the audit was conducted and completed;
- g. a summary of the findings, including general descriptions of evidence of conformity and any nonconformities and corrective action plans to address them, opportunities for improvement, and exceptional practices; and
- h. the certification decision.

The summary audit report will be posted on the *SFI Inc.* website (www.sfiprogram.org) for public review.

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

Audit Notes: The 2015 SFI Surveillance Audit Summary Report, which contains the required information, is posted on the SFI website.

Performance Measure 14.2

Program Participants shall report annually to SFI Inc. on their conformance with the SFI 2015-2019 Forest Management Standard. Indicators:

14.2.1. Prompt response to the *SFI* annual progress report survey.

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

Audit Notes: Per email from R.D. of SFI Inc.: " yes, March 29th"

14.2.2. Record keeping for all the categories of information needed for *SFI* annual progress report surveys.

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

Audit Notes: Jamaica Tract, Vermont: Consulting forester's systems and documentation include key information required.
 Sansavilla Tract, Georgia: Consulting forester's systems and documentation were assessed and found to be reliable and detailed respectively.

North Coast California: Records requested were readily available, and showed that all categories of information are available. This program is particularly complex and broad, and the organization, depth, and clarity of written documentation were superb and contributed greatly to an efficient audit process.

14.2.3. Maintenance of copies of past survey reports to document progress and improvements to demonstrate conformance to the *SFI 2015-2019 Forest Management Standard*.

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

Audit Notes: From "SFI Forest Management Program - The Conservation Fund (TCF) and Subsidiaries":
 "TCF collects and maintains records for all categories of information needed for the SFI Annual Progress Report. The Forest Operations Manager submits the reports to SFI, Inc. by the deadline of March 31st for the previous years' activities."

The Forest Operations Manager maintains past reports electronically.

Objective 15 Management Review and Continual Improvement

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

Performance Measure 15.1

Program Participants shall establish a management review system to examine findings and progress in implementing the *SFI 2015-2019 Forest Management Standard*, to make appropriate improvements in *programs*, and to inform their employees of changes.

Indicators:

15.1.1 System to review commitments, *programs* and procedures to evaluate effectiveness.

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

Audit Notes: Sansavilla Tract, Georgia: Forest management activity records cover harvests and other significant management activities. All tracts are inspected at least annually, even if there has not been any management activity.

North Coast California: From the "Social Benefit/Impact Assessment Memo - The Conservation Fund's North Coast Forest Conservation Program": As part of our annual monitoring, we publicly report (via the Annual Review) our data on key activity metrics. Most relevant to this topic is reporting on local economic contribution, participants in our public access program, and number of public tours we host. In addition to these three metrics that seem to best track the community interest, we usually also include short features on specific harvests, restoration projects, or safety issues. We also keep a log of any criticisms the program receives and how those are resolved. These metrics and concerns are also reviewed annually by the local Advisory Council. Source: North Coast Forest Conservation Initiative - 2015 Annual Review

Confirmed by reviewing some key documents and by interviewing David Whitehouse and Trevor Cutsinger:

The Forest Operations Manager oversees activities on the parcels outside of California. Consulting foresters provide regular written reports, and the Forest Operations Manager visits each property regularly. The reporting framework includes:

Quarterly Reports (template under separate attachment) due by 15th day of new quarter for previous quarter

Annual Report (summary of quarterly reports from the previous year) due by January 15th

Annual Budget (submitted by December 15th) for following year

Annual Management Plan (based on budget, explains proposed operations)

15.1.2 System for collecting, reviewing, and reporting information to management regarding progress in achieving *SFI 2015-2019 Forest Management Standard objectives and performance measures*.

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

Audit Notes: Elements of the system are listed in TCF-SFI-03 SFI Evidence Manual & Internal Audit Checklist:

- Monitoring Checklists (Harvest Operations Site Review Reports) (2.3,3,a)
- State BMP Monitoring Reports (10.2,1,b)
- Staff Training Matrix (11.1,3,a)
- Contractor Training Matrix (11.1,4,a)

15.1.3 Annual review of progress by management and determination of changes and improvements necessary to continually improve conformance to the *SFI 2015-2019 Forest Management Standard*.

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

Audit Notes: Reviewed the agenda and minutes for the Annual SFI Management Review that was held on September 14, 2016. "Attended: Buck Vaughan, Brian Dangler, Evan Smith, Bethany Olmstead, Scott Tison, Scott Kelly, Holly Newberger, Trevor Cutsinger, Kevin Harnish". Relevant items discussed are listed:

- Past Action Item review
- The Monitoring Checklist and State BMP Inspection Reports;

- External audit and corrective action results Staff and contracting training accomplishments documented in the Training Matrices Suggested changes/improvements to policies or procedures.
- Success and Failures of Social Impacts?
- Review the SFI Annual Survey Report;
- SFI Implementation Committee Action Items and Inconsistent Practices complaints; Changes to the SFI Standards and action needed to meet the new requirements.

Also interviewed David Whitehouse and Trevor Cutsinger

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

“TCF has a formal system for annually collecting information about its SFI implementation, evaluating the effectiveness of its SFI Programs, reporting information to management, determining whether any changes or improvements are necessary to continually improve SFIS conformance, and communicating those changes to responsible personnel.

TCF references its management review process in its Sustainable Forestry Commitment and in the internal memo to appropriate managers regarding its commitment to the SFI Standard.

The SFI Implementation Team shall annually conduct a review of the SFI Program. During the first quarter of each calendar year, or as appropriate, the Forest Operations Manager shall serve as the Chairman of the Implementation Team and shall develop a formal Management Review Agenda (TCF-SFI-16). The management review will evaluate SFI performance during the preceding calendar year or 12 months. At a minimum, the SFI Management Review shall address:

The Monitoring Checklist and State BMP Inspection Reports;

Any Environmental Incidents and corrective action results;

External audit and corrective action results (i.e. third party SFI audits);

Staff and contracting training accomplishments documented in the Training Matrices; and

Suggested changes to policies or procedures.

The Chair of the SFI Implementation Team shall ensure that all necessary information to address these issues is collected and available for the management review. The SFI Implementation Team shall also review the Sustainable Forestry Commitment, the SFI Program and assess TCF’s performance against its own programs, plans, and procedures, as well as the SFI Standard.

At the conclusion of the annual management review, any significant findings or action items shall be presented by the Forest Operations Manager at the next scheduled Certification Team meeting. The Certification Team shall review and decide on any overall actions. The Forest Operations Manager shall make any appropriate changes to the overall SFI Program and communicate those changes to responsible staff via a Summary Memo. The Forest Operations Manager shall coordinate any appropriate follow-up implementation training to effect the changes. “

Appendix 4

Meeting Attendance

NSF Audit Attendance Sheet

Company Name:	The Conservation Fund		
Locations:	Georgia, California, Vermont, Connecticut		
Type of Audit:	Surveillance; Scope Expansion		
Opening Meeting Date:	Thursday September 28	Closing Meeting Date:	November 4, 2016

NAME (Printed)	TITLE/POSITION	OPENING MEETING (Initials)	CLOSING MEETING (Initials)
David Whitehouse (all)	Forest Operations Manager, Working Forest Fund®	DW	DW
September 29 (Georgia)			
Trevor Cutsinger	Business Manager, Working Forest Fund®		
Kevin Harnish	Analyst, Working Forest Fund®		
Wade Harrison	TNC		
Joe James	James Resource Management		
Jason Lee	Georgia Department of Natural Resources		
October 4-6 (California)			
Holly Newberger	North Coast Program Coordinator, TCF		
Scott Kelly	Timberlands Manager, TCF		
Lauren Fety	Forest Analyst, TCF		
Madison Thompson	Forester, TCF		
David Whitehouse	Forest Operations Manager, Working Forest Fund®		
November 1 (Vermont)			
Trevor Cutsinger	Business Manager, Working Forest Fund®		
Ben Machin	Forester, Partner, Redstart Natural Resource Management		
Markus Bradley	Forester, Partner, Redstart Natural Resource Management		
Dana Hazen	Forester, Redstart Natural Resource Management		

Appendix 5

Field Site Notes

Sansavilla Tract, Georgia:

Friday September 30, 2016

Site 1. Stand 122. This 15 year-old planted Longleaf Pine Stand was thinned in 2015 and then had an understory prescribed burn in February 2016 implemented by Georgia DNR based on a stand-specific burn plan approved months in advance. Regular burning will be required to develop appropriate habitat, with the need to shift to "leaf-on" (summer) burns.

Site 2. Stand 226. Clear-cut under TCF ownership in 2015, then site preparation herbicide sprayed by B&S Air, Inc. (cert GA-07086). Reviewed "Silvicultural Activity Plan 1.10.15" which includes the prescription (Rotary-Imazapyr, Triclopyr, and a surfactant), Unique Features, Wildlife & Biodiversity Considerations, Post-Activity Measures, and Maps. Also the Silviculture Activity Inspection Report. B&S Air Inc. used helicopter in September 2015 to spray at the label rate for site preparation. Containerized seedlings were planted at slightly closer than the standard of 6 by 12 foot spacing in January.

Site 3. Stand 71. A right of way corridor for a large power line crosses the property. The power company controls the vegetation beneath the lines by regularly mowing it. The grass-dominated vegetation here has provided fair habitat for a population of Gopher Tortoises for many years when the understory vegetation in the adjacent densely-stocked stands was not suitable. Evidence was seen that the Gopher Tortoises have moved to adjacent heavily-harvested stands, including Site 4 described below and an adjacent clear-cut that was not reviewed.

Site 4. Stand 831. Shelterwood Harvest Completed in 2015 leaving a low basal area (about 40 square feet per acre) to balance immediate habitat enhancement for Gopher Tortoise against the need for pine needles to support required future prescribed burns. Pre-harvest plan was reviewed; it includes the record of the Master Timber Harvester Number 3700. A prescribed burn was completed in February 2016 moving the vegetation towards the target conditions. Some wiregrass and desired herbaceous plants were seen, as well as numerous Gopher Tortoise burrows. Discussed Gopher Tortoise habitat needs and the vegetative dynamics related to developing, maintaining, and improving such habitat.

Site 5. Stand 727. Site-preparation sprayed in the fall of 2015 and then planted to Longleaf Pine in 2016. The seedlings appear to be healthy and growing well.

Site 6. Stand 129. Reviewed the site of a 6-acre wild fire on August 23, 2016, 3.6 acres on The Conservation Fund's lands. Forester for Joe James Consulting was called to the active fire by the Georgia Forestry Commission and provided information and logistical support. Reviewed the Georgia Forestry Commission Wildfire Data Record and discussed the impacts of the fire and the lines on Gopher Tortoises, which was described as minimal.

Site 7. Stand 727. Former stand was clear-cut, the area received chemical site preparation in September 2015, and then planted to Longleaf Pine at 6 by 12-foot spacing. More evidence was seen of Gopher Tortoise movement into recently clear-cut areas.

Site 8. Stand 243. Loblolly Pine planted in 2014 by a previous landowner at 5 by 12-foot spacing by a previous landowner. The trees are well-established and growing rapidly.

Site 9. Stand 6. 86-acre stand planted to Longleaf Pine at 6 by 12 foot spacing (605 tpa) planted January 2015. Previous owner bedded, and a chemical release might be needed. Some of the Longleaf Pine seedlings are already starting to emerge from the grass stage.

Site 10. Stand 71. Altamaha River Bluff and historic site. The Conservation Fund protected the site when it was owned by avoiding the area, and then by applying a protective easement and recently selling the site to the state of Georgia. Confirmed extensive knowledge of the site and the long-term history by all involved including partners.

Site 11. Stand 168. Longleaf Pine stand age 40 or older that was established by an industrial owner as a seed orchard. The stand has received understory burning periodically, most-recently in February 2016, so the understory is open and the ground cover reasonably useful as Gopher Tortoise habitat. Discussed the stand dynamics and the long-term prospects for developing nesting habitat for Red-cockaded Woodpeckers.

Site 12. Active Clear-cut Harvest of a 13-year old loblolly pine stand. GDNR requested the treatment to remove loblolly pine as soon as practical within the priority treatment zone for Gopher Tortoise habitat management. The forester offered the timber for sale when prices were strong because it was on a drier site with good road access. Harvest occurred from Feb. through April, then left due to wet conditions during spring and early summer, and then returned a few weeks ago. Inspection reports for 3.10.16, 3.15.16, 4.1.16 were reviewed. Interviewed Ricky Wilson of Wilson Brothers Inc. Mr. Wilson confirmed appropriate training and knowledge of BMPs and The Conservation Fund's expectations.

Site 13 Stand 372. Planted Loblolly 2015.

Site 14. Stand 734. Active clear-cut of Slash Pine on 46 acres by Pierce Timber Company. Bryan Peacock Master Timber Harvester #3725. Confirmed uncut buffers approximately 20 feet back from an agricultural drainage ditch and appropriate measures to protect the crossing of the ditch using logs and slash, all removed when finished crossing.

Site 15. Active harvest by Donald Wilson, Scitilla Logging.

Site 16. Compartment #5. Small active southern pine beetle hot spot. Consulting forester conducted an aerial survey of the property to look for unhealthy trees. He and his staff look for dying trees. Discussed measures to prevent this spot from spreading.

Site 17. Compartment #16 along Highway 25. Longleaf Pine planted in 2015 is fully stocked.

Site 18 Compartment #16. Access road owned by The Conservation Fund had been badly rutted previous to purchase. Logger using this road to access Sale 1 TAR Land & Timber in Compartment 19 smoothed the ruts and spread gravel, resulting in a stable road section with no issues.

Site 19. Stand was clear-cut, had no mechanical site preparation, and is awaiting spraying in the fall of 2016. Slash pine will be planted at 6 by 10-foot spacing in January 2017.

Site 20. Mature Loblolly Pine Stands. The property contains many financially mature Loblolly Pine Stands that will be gradually cut over and converted into site-appropriate slash or longleaf pine. While slightly over-stocked no health issues were apparent, and foresters are monitoring and ready to treat if pine beetles attack.

Site 21. Bottomland Hardwood Forest Type. Walked through a Tupelo-Cypress stand that has been reserved from harvest by The Conservation Fund and will remain when owned by Georgia as a reserve.

Salmon Creek Forest, California:

Tuesday October 4, 2016

Site 1. Upper Hazel THP. Nearly completed single-tree selection harvest in a 202 acre block last harvested 15 years ago. Prescription is to cut 1/3 of basal area to maintain and improve uneven-aged structure. Up to one-third of the basal area of redwood, Douglas-fir and white fir were harvested and trucked to mills. Portions of area had too much Tanoak, but TCF is committed to not using herbicides on Salmon Creek, so the foresters marked any tanoaks smaller than 20 inch dbh that were competing with established conifers and the logger was paid to fell these marked tanoaks. Some of them will be used for firewood during a community firewood harvesting event. Robert Piper of Piper Logging is the LTO.

Confirmed significant retention as specified in the THP, including retaining: snags and trees with high defect, non-tanoak hardwoods, conifers larger than 48" dbh, and use of single-tree selection to avoid degrading NSO habitat.

Map of Upper Hazel THP shows springs, wet areas, and watercourses, facilitating their protection.

Discussed protection of amphibians throughout all of the 5 North Coast California forests and NSO protection.

Site 2. Access road to the Upper Hazel THP. Meets California THPs.

Big River Forest, California:

Tuesday October 4, 2016

Site 3. Pre-Commercial Thinning. Stand is legacy of past ownership practices, and is 15-years old, starting after a clear-cut. The work was not done as part of requirements associated with a Timber Harvest Plan, but was done to further the forestry goals of increasing the conifer component, and represents a common condition on the Big River tract. The site is now fully-stocked with healthy, vigorous, free-to-grow redwood and Douglas-fir trees.

Site 4. Feldman Gulch Timber Harvest Plan. Units here were harvested by Piper Logging in the spring of 2016 and closed in August, with minor work associated with trucking roads remaining. Confirmed the following good practices:

- Waterbars on skid trails and roads constructed "by the book" and functioning as intended
- Protection of healthy, vigorous residual stand, including desirable regeneration
- Protection of riparian areas via generous buffers
- Restored natural contours at the Feldman Gulch stream crossing location

Site 5. Big River Forest Access Road System. Extended driving tour of this extensive road system starting at the Docker Hill Gate (southeastern entrance to the property) and going to the "Habitat Improvement/Landslide Removal" project location.

Roads along the river are rocked. Some sloping sections have minor surface erosion, but generally drainage structures are functioning as designed. Confirmed installed tanks connected to wells for road-watering; this method avoids the need to “draft” directly from streams, avoiding risk of harming fish. Discussed issues associated with control of Pampas grass; neighbors did not like past herbicide spraying, so TCF is avoiding spraying and this plan is spreading.

Site 6. Bridge at Hatch Gulch at permanent road. Log stringers, wooden deck, open in middle; originally an old railroad bridge, the bridge was resurfaced by TCF.

Site 7. Habitat Improvement/Landslide Removal on the East Branch of the Little North Fork of the Big River. This project was funded in part by the California Fish and Wildlife’s Fisheries Restoration Grant Program. A landslide associated with legacy roads had blocked fish passage, and this project has restored access to more than ½ mile of anadromous fish habitat upstream of the project location. Later some in-stream structure will be installed.

Garcia River Forest, California:

Wednesday October 5, 2016

Site 1. Hollow Tree Road. Confirmed considerable work done as part of the Timber Harvest Plan, including proper inside ditches, rolling dips, cross drains, and in places a crowned surface.

Site 2. Hollow Tree Planting Site. Timber Harvest Plan is described next. Planted redwood in group-selection openings. Live trees appear to meet stocking requirement. Seed was harvested from two local sources and grown at a nursery in Washington State. Surplus seed is in cold-storage.

Site 3. Hollow Tree Timber Harvest Plan. Completed harvest with 101 acres treated by single-tree selection and 420 acres of group selection. The harvest was operated by tractor on pre-existing trails. Group openings sized 0.5 to 0.99 acres are regularly distributed and contain wildlife legacies and retention per plan and criteria of the project. Confirmed hardwood control in groups via cutting (by contractor as part of commercial harvest) or by hack-and-squirt herbicide method.

Site 4. Bridge over the main stem of the Garcia River on Hollow Tree Road. Redwood log stringers; appropriate installation.

Site 5. Bluewater Hole Creek. Fisheries biologists working on a joint stream habitat monitoring project including California Water Control Board and The Nature Conservancy the previous day unexpectedly found young Coho salmon. This is the first documented time for this species in this stream.

Site 6. Hollow Tree Road Scotch Broom on a section of Hollow Tree Road. The Conservation Fund has funded multiple efforts to hand-pull, but will likely use herbicide next to control before this invasive plant spreads further.

Site 7. Graphite Creek Sediment Reduction and Coho Habitat Protection Project. Graphite Road improvement project was funded in part by the California Fish and Wildlife’s Fisheries Restoration Grant Program after thorough analysis working with regional specialists who “wrote the book” on road restoration. Four areas were reviewed:

- a. Crossing #1634
- b. Crossing #1630
- c. Legacy road to be decommissioned
- d. Crossing # 1640

Site 8. North Fork Road. Many portions are rocked and in excellent condition.

Site 9. Olsen Gulch Timber Harvest Plan. An active plan consisting of marked single-tree selection inside of and outside of the Ecological Reserve. Some areas are not yet cut, some cut and not yet yarded, and some yarded but not all trucked. Some down and some yarded wood remained on the site through the winter, evidence of halting operations due to season. Auditors compared marking within the Ecological Reserve (marked from below) and outside (marked from various crown-classes, but mostly co-dominants to be removed, leaving smaller trees to grow rapidly. In the Ecological Reserve some effort was made to implement variable-density thinning including “skips and gaps” as recommended by ecological forestry advocates. This nuance seemed to apply to species other than redwood.

Buckeye Forest, California:

Thursday October 6, 2016

Site 1. Kelly Road access issues. Discussed challenges from neighbor’s determination to limit legal access to the tract.

Site 2. Buckeye Forest road system. Observed portions recently-graded, including on the day of the audit.

Site 3. Buckeye Forest. Forest conditions are consistent with descriptions in draft plan, which has been held up due to the access dispute. No obvious forest health problems were observed. Observations support the forest manager's opinions that most stands can be allowed to grow for several more years before treatment, and that light treatments would help improve composition and steer forest development but delays are not problematic. Also discussed the very challenging markets here for Douglas-fir (about 50% of the commercial volume) and Sugar Pine (25%), which further limit options.

Jamaica Tract 770, Jamaica, Vermont:

Tuesday November 1, 2016

Site 1. Stand 1. This 55-acre northern hardwood stand was harvested in the winter of 2016. The objective is "Transition this stand from an even-aged stand to an all-aged stand. Manage for the production of hardwood sawtimber using all-aged management techniques. All-aged management is used to create and perpetuate at least three age classes of trees through periodic harvesting and natural disturbance." The objective was addressed by marking a single tree and/or group selection harvest, which was successfully completed by a logger who felled the trees with a chain saw and used a cable skidder to yard the trees. A very good logging job was noted, including minimal impacts to the site and to residual trees. One small stream crossing was required; the crossing point was protected using poles (pole ford). The skid road and trails were planned, installed, and stabilized per BMPs and appear stable. Discussed wildlife sign and uses in this forest, and measures used to retain important wildlife elements including snags, den trees, other trees being actively-used, and coarse woody debris.

Site 2. Stand 3. No harvesting was done in this small, hemlock-hardwood stand is along the southern boundary of the property. Discussed forest successional trends, riparian protection, Hemlock woolly adelgid, and Beech bark disease.

Stanley Tract, Kent, Connecticut:

Friday November 4, 2016

This forested tract is located along the Housatonic River and provides scenic and recreational benefits to the area's population. The tract is separated from US Route 7 by a railroad line. The forest here was found to be well-stocked. One stand contains large, mature hemlock and oak trees; an adjacent younger stand contains a grove of Aspen and mixed hardwoods consistent with forest recovery following the cessation of farming about 70 years ago. Overall the forests are healthy and productive, although the slow decline and ultimate death of the hemlock trees from impacts of the Hemlock woolly adelgid seems likely.